Draft RCRA Model Standardized Permit
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MODULE I - GENERAL PERMIT CONDITIONS

[This permit module contains the general conditions required for all RCRA standardized permits for container storage areas by 40 CFR Part 270. This module must be included in all RCRA standardized permits for container storage areas.]

I.A. EFFECT OF PERMIT

The Permittee is allowed to **[insert appropriate method: treat and/or store]** hazardous waste in accordance with the conditions of this Permit. Any **[storage and/or treatment]** of hazardous waste not authorized in this Permit is prohibited. Subject to 40 CFR 270.4, compliance with this Permit generally constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 106(a), 104, or 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment. [40 CFR 270.4, 270.30(g)]

I.B. PERMIT ACTIONS

I.B.1. Permit Modification

This Permit may be modified for routine, routine with prior approval, and significant changes through compliance with the following Permit Conditions: [40 CFR 270.320, 124.211 through 124.214, and 270.41]

I.B.2. Permit Revocation and Re-issuance, and Termination

This Permit may be revoked and reissued, or terminated for cause, as specified in 40 CFR 270.41 and 270.30(f). The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changed or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition. [40 CFR 124.5(c), 270.4(a), 270.30(f) and 270.41]

I.B.3. Permit Renewal

This Permit may be renewed as specified in 40 CFR 270.30(b) and Permit Condition I.E.2. Review of any application for a Permit renewal shall consider improvements in the state of control and measurement technology, as well as changed in applicable regulations. [40 CFR 270.30(b) and HSWA Sec. 212]

I.C. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. [40 CFR 124.16(a)]

I.D. DEFINITIONS

For the purposes of this Permit, terms used herein shall have the same meaning as those in 40 CFR parts 124, 260, 266, 267, 268, and 270, unless this Permit specifically provides otherwise. Where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Director" means the Director of the EPA Region **_____[insert EPA Region]**, or his designee or authorized representative.

I.E. DUTIES AND REQUIREMENTS

I.E.1. Duty to Comply

The Permittee shall comply with all conditions of the Permit, except to the extent and for the duration that noncompliance is authorized by an emergency Permit. Any Permit noncompliance, other than noncompliance authorized by an emergency Permit, constitutes a violation of RCRA and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. [40 CFR 270.30(a)]

I.E.2. Duty to Reapply

If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee shall submit a complete application for a new Permit at least 180 days prior to the Permit expiration. [40 CFR 270.10(h) and 270.30(b)]

I.E.3. Permit Expiration

Pursuant to 40 CFR 270.50, this Permit shall be effective for a fixed term not to exceed ten years. As long as EPA is the Permit-issuing authority, this Permit and all conditions herein will remain in effect beyond the Permit's expiration date, if the Permittee has submitted a timely, complete notice of intent under 40 CFR 124.202(b) requesting coverage under a RCRA standardized Permit and, through no fault of the Permittee, the Director has not issued a new permit, as set forth in 40 CFR 270.51. If the Director deems that the Permittee is not eligible for a standardized permit, the conditions of the expired permit will continue [40 CFR 270.50 and 270.51]

If the Permittee is no longer deemed to be eligible for a standardized permit, the Permittee shall provide to the Director a RCRA permit application in accordance with the applicable requirements for 40 CFR Parts 264 and 270.

I.E.4. Need to Halt or Reduce Activity Not a Defense

The Permittee shall not use as a defense that the Permittee must reduce permitted activities in order to maintain compliance with the conditions of the Permit in the event of an enforcement action. [40 CFR 270.30(c)]

I.E.5. Duty to Mitigate

In the event of noncompliance with the Permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures that are reasonable to prevent significant adverse impacts on human health or the environment. [40 CFR 270.30(d)]

I.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit, in accordance with 40 CFR 270.30(e).

I.E.7. Duty to Provide Information

The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit, pursuant to 40 CFR 267.72(a) and 270.30(h)]

I.E.8. Inspection and Entry

Pursuant to 40 CFR 270.30(i), the Permittee shall allow the Director, or an authorized representative to have entry to the facility, have access to records, and to conduct sampling.

I.E.9. Monitoring and Records

The Permittee shall comply with the requirements for gathering and maintaining monitoring information at 40 CFR 270.30(j).

I.E.10. Reporting Planned Changes

The Permittee shall give notice to the Director, as soon as possible, of any planned physical alterations or additions to the permitted facility. [40 CFR 270.30(l)(1)]

I.E.11. Reporting Anticipated Noncompliance

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. [40 CFR 270.30(l)(2)]

I.E.12. Certification of Unit Modification

The Permittee may not treat or store hazardous waste **[insert as appropriate: "at the facility" or "in the modified portion of the facility"]** until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the Permit; and followed the remaining requirements at 40 CFR 270.30(l)(2).

I.E.13. Transfer of Permits

This Permit is not transferable to any person except after notice to the Director. A change in the ownership or operational control of the facility shall be made through a routine change with prior written approval submitted to the Director, in accordance with 40 CFR 124.213. [40 CFR 270.30(l)(3), 270.40]

I.E.14. Twenty-four Hour Reporting

The Permittee shall report to the Director any noncompliance which may endanger health or the environment and comply with 40 CFR 270.30(l)(6).

I.E.15. Other Noncompliance

The Permittee shall report all instances of noncompliance not reported under Permit Conditions I.E.10 through I.E.14, at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition I.E.14, as per 40 CFR 270.30(l)(10)

I.E.16. Other Information

Whenever the Permittee becomes aware that they failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, the Permittee shall with 40 CFR 270.30(l)(11).

I.F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to or requested by the Director, his designee, or authorized representative, shall be signed and certified in accordance with 40 CFR 270.11 and 270.30(k).

I.G. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DIRECTOR

All reports, notifications, or other submissions which are required by this Permit to be sent or given to the Director shall be sent by certified mail or given to:

_____

_____

_____

[Note: Provide the name, address and telephone number of the Director or appropriate Regional Division Director.]

I.H. GENERAL DOCUMENTS AND INFORMATION TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility or other accessible location as designated by the Director, until closure is completed and certified by an independent, registered professional engineer, the materials listed at 40 CFR 270.290.

I.I. UNIT-SPECIFIC INFORMATION TO BE MAINTAINED AT THE FACILITY

I.I.1 Container-Specific Information to be Maintained at the Facility

[Note: if no containers are located at the facility, insert "Not Applicable".]

The Permittee shall maintain at the facility or other accessible location as designated by the Director, until closure is completed and certified by an independent, registered professional engineer, the following container-specific documents and information and all amendments, revisions and modifications to these documents and information as listed at 40 CFR 270.300.

I.I.2 Tank-Specific Information to Be Maintained at the Facility

[Note: If not tanks are located at the facility, insert "Not Applicable."]

The Permittee shall maintain at the facility or other accessible location as designated by the Regional Administrator, until closure is completed and certified by an independent, registered professional engineer, the following tank system-specific

documents and information and all amendments, revisions and modifications to these documents and information as listed at 40 CFR 270.305.

I.J. EQUIPMENT INFORMATION TO BE MAINTAINED AT THE FACILITY

[Note: this only applies to facilities that has equipment subject to 40 CFR Part 264 Subpart BB. If this does not apply, insert "Not applicable. The facility does use equipment subject to 40 CFR Part 264 Subpart BB.]

The Permittee shall maintain at the facility or other accessible location as designated by the Regional Administrator, until closure is completed and certified by an independent, registered professional engineer, the following equipment, for which 40 CFR Part 264 Subpart BB applies, documents and information and all amendments, revisions and modifications to these documents and information as listed at 40 CFR 270.310.

I.K. AIR EMISSION CONTROL INFORMATION TO BE MAINTAINED AT THE FACILITY

[Note: this only applies to facilities that have air emission control equipment subject to 40 CFR Part 264 Subpart CC. If this does not apply, insert "Not applicable. The facility does use air emission control equipment subject to 40 CFR Part 264 Subpart CC.]

The Permittee shall maintain at the facility or other accessible location as designated by the Director, until closure is completed and certified by an independent, registered professional engineer, the following air emission control documents and information and all amendments, revisions and modifications to these documents and information as listed at 40 CFR 270.315.

MODULE II - DESCRIPTION OF THE FACILITY AND OWNERSHIP

[Module II identifies the owner, operator, location and operation of the facility.]

II.A. OWNER

The facility owner is **[enter name of owner of the facility]**, herein referred to as the "owner". [40 CFR 270.13]

[The owner of the facility is ABC Chemical (hereafter "owner"), a wholly owned subsidiary of XYZ, Inc.]

II.B. OPERATOR

The facility operator is **[enter name of operator of the facility]**, herein referred to as the "Permittee". [40 CFR 270.13)]

[The operator of the facility is ABC Chemical (hereafter "Permittee"), a wholly owned subsidiary of XYZ, Inc.]

II.C. LOCATION

II.C.1. Location of Facility

[Provide the common street address (mailing address) and precise physical location of the permitted facility, including county. Indicate if the facility is located on Indian lands.]

[**ABC Chemical is located in southern Ash County, Washington, approximately 10 miles north of the City of Beechwood, and near the intersection of Highway 10. The following is the physical address for the ABC Chemical container storage area to be permitted by this Permit:**

ABC Chemical
123 Elm Street NW,
Anytown, WA 12345-1234]

II.C.2. Facility Layout Map

[Include a site location map and facility layout figure(s) and reference as an attachment.]

A site location map and figures showing the layout of **[insert facility name]** are provided in Attachment **[insert attachment number.]**

MODULE III - GENERAL FACILITY CONDITIONS

[This permit module contains conditions covering the general facility requirements of 40 CFR Part 267. This module must be included in all RCRA Standardized Permits for Container Storage.]

III.A. DESIGN AND OPERATION OF FACILITY

Pursuant to, the Permittee shall design, construct, maintain, and operate the facility as specified in 40 CFR 267.31.

III.B. GENERAL WASTE ANALYSIS

The Permittee shall follow the waste analysis requirements of 40 CFR 267.13, and as described in the Waste Analysis Plan.

III.C. SECURITY

The Permittee shall prevent, and minimize the possibility for, livestock and unauthorized people from entering the active portion of the facility, pursuant to 40 CFR 267.14

III.D. GENERAL INSPECTION REQUIREMENTS

The Permittee shall conduct inspections, record keeping, and remedy of problems, according to 40 CFR 267.15.

III.E PERSONNEL TRAINING

The permittee shall ensure that the training requirements of 40 CFR 267.16 are met.

III.F. SPECIAL PROVISIONS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

[Note: This condition should be included in the Permit only if the facility handles ignitable, reactive or incompatible wastes. If the facility does not handle ignitable, reactive or incompatible wastes, insert the terms "Not Applicable" for this condition.]

The Permittee shall take precautions when managing ignitable or reactive waste by following the requirements of 40 CFR 267.17.

III.G. LOCATION STANDARDS

The permittee shall ensure the location standards of 40 CFR 267.18 are met.

[

III.H. PREPAREDNESS AND PREVENTION

III.H.1. General Design and Operation Standards

The facility shall be designed, constructed, maintained, and operated in a manner meeting the requirements of 40 CFR 267.31.

III.H.2. Required Equipment

[Note: this condition does not apply if the facility can demonstrate that none of the wastes handled or maintained at the facility could potentially cause any fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water, that could threaten human health or the environment. If the requirements of this condition do not apply, insert the terms "Not Applicable" for this condition and provide a brief justification for the exemption.]

The Permittee shall ensure that the facility will be equipped to meet the requirements of 40 CFR 267.32.

III.H.3. Testing and Maintenance of Equipment

The Permittee shall test and maintain all the required facility equipment specified at 40 CFR 267.33.

III.H.4. Access to Communications or Alarm Systems

[Note: this condition is not applicable if communications or alarm system devices are not required, as indicated in Permit Condition III.H.2. If these systems are not required, indicate this condition to be "Not Applicable".]

The Permittee shall ensure that all personnel shall have immediate access to an internal alarm system or emergency communications device as required by 40 CFR 267.34.

III.H.5. Required Aisle Space

Aisle space shall be maintained according to the requirements of 40 CFR 267.35.

III.H.6. Arrangements with Local Authorities

Arrangements and agreements shall be made with local authorities according to 40 CFR 267.36.

III.I. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

The Permittee shall have a contingency meeting the applicable requirements of 40 CFR 267 subpart D.

III.J. RECORDKEEPING, REPORTING AND NOTIFICATION (40 CFR 267 Subpart E)

The Permittee shall comply with the applicable manifest requirements of 40 CFR Part 262, according to 40 CFR 267.70.

III.J.1. Recordkeeping

The Permittee shall keep a written operating record at the facility, until facility closure, as specified at 40 CFR 267.71.

III.K. CLOSURE

The Permittee shall obtain clean closure of the facility in compliance with 40 CFR 267 Subpart G. (If clean closure is not obtainable, the Permittee shall obtain an individual post-closure permit separate from this Permit. [40 CFR 267.110)]

MODULE IV - CONTAINERS, TANKS, AND CONTAINMENT BUILDINGS

[Note: the permit module specifies the requirements for each type of storage and treatment unit at the facility (i.e., containers, tanks, and containment buildings). The specific requirements for each type of unit are listed below, in separate submodules, as follows. Module IVa addresses the requirements for storage or treatment in containers. Module IVb addresses the requirements for storage or treatment in tanks. Module IVc addresses the requirements for storage or treatment in containment buildings. Where a permit does not include a specific type of unit, insert "Not Applicable," as described below.]

IVa CONTAINERS

[Note: this permit module should specify whether the Permit is to allow for storage or treatment in containers. A single container module section may be used even if the facility has multiple container units to be covered by the same Permit. However, it is acceptable to include multiple container modules if, in the Permit Writer's judgement, the characteristics and permit conditions for each area are sufficiently different to warrant multiple modules. Unique permit conditions may also be addressed in Module V, Supplemental Information.]

[Note: under 40 CFR 261.7 and 261.33(c), if the Permittee empties a hazardous waste from a container, the residue remaining in the container is not considered a hazardous waste if the container is "empty" as defined in 40 CFR 261.7. If the container is "empty", the management of that container is exempt from the requirements of this Module, for a standardized permit.]

[Note: if no containers are in operation (or to be operated) at the permitted facility, insert "Not Applicable"]

IVa.A. GENERAL DESCRIPTION

[Note: include a general description of the activities covered by this module.]

The Permittee shall manage and/or store **[insert type of waste]** in containers in the designated container storage areas (CSA) specified in Table IVa-1. The Permittee shall not manage and/or store **[insert type of waste]** in excess of the maximum capacities for each individual CSA identified in Table IVa-1.

TABLE IVa-1
[INSERT FACILITY/AREA NAME] Container Storage Areas
Waste Types and Design Capacities

TYPE OF STORAGE (Area)	EPA HAZARDOUS WASTE TYPE	DIMENSIONS (ft) AREA (sq ft)	MAXIMUM VOLUME OF WASTE (gal)[a]
CSA(s) Allowing Liquid and Solid Waste			
[Building A-1, Storage Pad]	**[Insert specific wastes to be managed and stored, including EPA waste codes]**	**[60 x 40 Area: 2400]**	**[55,000]**

TABLE IVa-1
[INSERT FACILITY/AREA NAME] Container Storage Areas
Waste Types and Design Capacities

TYPE OF STORAGE (Area)	EPA HAZARDOUS WASTE TYPE	DIMENSIONS (ft) AREA (sq ft)	MAXIMUM VOLUME OF WASTE (gal)[a]
			Continued...
CSA(s) Allowing Only Solid Waste			
[Building B-1, Indoor Storage Pad]	**[Insert specific wastes to be managed and stored, including EPA waste codes]**	**[6 x 6 Area: 36]**	**[600]**

[a] Volume may be based on the capacity of a standard 55-gallon drum (7.3 cu. ft)

The Permittee shall comply with the following conditions:

[Insert a brief description of each CSA. Information should include:

1. **Description and Dimensions for Each Container Area. (Note: this should include a physical description of the container area, whether it is located indoors or outdoors, and the actual dimensions of the container area, and the dimensions of the area(s) where waste will be stored;**
2. **Maximum Amount and Type of Wastes;**
3. **Description and Capacities of Containment Systems;**
4. **Unique or Special Features; and**
5. **Reference to Special Permit Conditions in this Module or in Module V, Supplemental Information.]**

IVa.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

[The following Permit Conditions should include a list of specific wastes or waste groups that may be stored the container storage area, or if more than one unit is permitted, for each container storage area. This should also include specific wastes that are prohibited from storage at each container storage area. This should include specific wastes and waste form, such as liquid wastes.]

IVa.B.1. Permitted Waste

[Note: the permit writer should specific wastes (may refer to Table VI-1) and waste form (solid, liquid or both) for specific CSAs.]

The Permittee may store and manage **solid and/or liquid** hazardous waste at **[insert CSAs],** in quantities no to exceed the amounts shown in Table IVa-1 at each individual CSA, subject to the terms of this Permit.

All containers shall be labeled with appropriate U.S. EPA Hazardous Waste Codes.

IVa.B.2. Prohibited Waste

The Permittee is prohibited from managing and storing in the CSAs any hazardous waste that is not identified in Permit Condition IVa.B.1, above.

a. The Permittee is prohibited from accepting or storing waste with the following codes: **[insert wastes e.g., F-020, F-021, F-022, F-023, F-026, and F-027]**.

b. The Permittee is prohibited from storing waste containing free liquids at **[insert CSAs]**. **[Note, if the Permittee is not restricted at any of the CSAs to just solid wastes, insert the following for the above, "Not applicable: the Permittee is not prohibited from storing wastes containing free liquids at any of the CSAs."]**

IVa.C. CONDITION OF CONTAINERS

The Permittee shall ensure that all containers are in good condition, as per 40 CFR 267.171(a).

The Permittee shall only store hazardous waste in those container types identified in Table IVa-2 only.

TABLE IVa-2
ACCEPTABLE STORAGE CONTAINERS

CONTAINER STORAGE AREA	ACCEPTABLE CONTAINERS BY TYPE
[Storage Pad]	**[15-, 30-, and 55-gallon drums, waste boxes - e.g., roll off]**

[Indoor Storage Pad] **[waste boxes - e.g., roll off boxes]**

IVa.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall ensure compatibility of the waste with the container as per 40 CFR 267.171(b).

IVa.E. MANAGEMENT OF CONTAINERS

The Permittee shall manage their wastes in containers according to the requirements in 40 CFR 267.171(c).

IVa.E.1. Storage Configuration

The Permittee shall maintain adequate aisle space as per 40 CFR 267.35. The Permittee shall not exceed:

a. A reasonable and safe stack height for containers.

b. The maximum volume of waste for each CSA as listed in Table IVa-1.

IVa.E.2. Storage Container Emission Controls

All containers used to contain hazardous waste shall control air pollutant emissions from each container in accordance with 40 CFR 264 Subparts AA, BB, CC.

[Insert if applicable: All containers holding mixed waste or transuranic waste shall be vented with high-efficiency particulate air (HEPA) filters to allow venting of gases, but prevent release of airborne particles.]

IVa.F. CONTAINMENT SYSTEMS

[Note: this permit condition only applies for containers with free liquids. If there will be no containers with free liquids then the Permittee does not need to design or provided operating conditions for containers that may have free liquids, then insert the statement, "The Permittee shall not store any containers that contain free liquids."]

The Permittee shall construct and maintain secondary containment systems as required

by 40 CFR 267.173.

IVa.G. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall, at a minimum, conduct inspections of all areas holding storage containers as required by 40 CFR 267.172.

IVa.H. SPECIAL CONTAINER PROVISIONS FOR IGNITIBLE OR REACTIVE WASTE

IVa.H.1. Location of Ignitible and Reactive Wastes

The Permittee shall not locate containers holding ignitible or reactive waste within 50 feet (15 meters) from the facility property line, as per 40 CFR 267.174.

IVa.H.2. Procedures to Prevent Ignition/Reaction

The Permittee shall take all appropriate precautions to prevent accidental ignition or reaction of ignitible or reactive waste, as per 40 CFR 267.17, and shall follow procedures specified in the site Waste Analysis Plan.

IVa.H.3. Stacking of Ignitable and reactive Waste Containers

Containers of ignitible and reactive wastes shall be stacked no more than two high, in order to comply with the National Fire Protection Association's *Flammable and Combustible Liquids Code*.

IVa.I. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

If the Permittee stores of incompatible wastes in containers, the applicable requirements of 40 CFR 267.175 must be followed.

IVa.J. PREPARATION FOR CLOSURE

The Permittee shall comply with the closure requirements as Module III.K of this Permit.

IVb - TANKS

[Note: this permit module applies if the facility treats or stores hazardous waste in above-ground or on-ground tanks. A standardized permit is not applicable for below-ground storage tanks. Unique permit conditions may also be addressed in Module V, Supplemental Information.

A single permit module should be used if multiple tank systems are to be covered under this Permit for the facility. However, the permit writer may wish to include multiple tank system modules if the characteristics are sufficiently different to warrant multiple modules.]

[Note: if no tanks are in operation (or to be operated) at the permitted facility, insert "Not Applicable"]

IVb.A. GENERAL DESCRIPTION

This Module specifies the regulatory requirements that the Permittee shall follow when managing and storing hazardous waste in the **[insert name of tank(s) or tank system]**. The Permittee is authorized to manage and store only those hazardous wastes listed in Permit Condition IV.C.1.

The Permittee is authorized to manage hazardous wastes in the following storage tank systems(s):

- **[insert specific tanks or tank systems to be permitted under this Permit]**;

The Permittee may store and/or treat up to a maximum of **[insert number]** gallons of hazardous waste in the designated tanks discussed in Permit Condition IVb.B.

IVb.A.1. Storage Tank System

[Note: insert a general discussion of each storage tank or storage tank system. This should include (but not be limited to) whether waste is to be stored and/or treated, the location of the tank system(s), a brief discussion of components of the system, where waste is generated, a brief discussion of how waste is generated, treatment processes, how tanks within a system may be connected, and any special features associated with the tank(s)]

IVb.B. DESIGNATED STORAGE TANK SYSTEM

The Permittee shall store and/or treat hazardous wastes in tanks in the designated storage tank systems described in Permit Condition IVb.A.1 and as specified in Table IVb-1. The Permittee shall not store and/or treat waste in excess of the maximum capacities for each individual tank identified in Table IVb-1.

TABLE IVb-1
[insert facility name or area name] Storage Tank System
Waste Types and Design Capacities

STORAGE TANK SYSTEM, LOCATION, & NO. OF ASSOCIATED TANKS	DESIGN SPECIFICATIONS	EPA HAZARDOUS WASTE TYPE	SECONDARY CONTAINMENT	MAXIMUM VOLUME OF WASTE AND SIZE OF TANK/ THROUGH PUT Gallons (Liters)
[Tank HS-11, Building A-1, Room B1, 3 identical tanks	**[insert design specifications, dimensions, treatment or storage, material of construction, etc.]**	**[waste organic solvents, F005]**	**[yes or no and if yes, brief description]**	**[1,000 (3,785 L)]**

IVb.C. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IVb.C.1. Permitted Waste

[Note: the permit writer should specify specific wastes (may refer to Table IVb-1) and waste form (solid, liquid or both) for specific tanks and tank systems.]

The Permittee may store hazardous waste at **[insert tank/tank system(s)]**. Table IVb-1 above shows the maximum amounts of hazardous waste that the Permittee shall store within each tank system, subject to the terms of this Permit.

The Permittee shall ensure that all waste solutions bear the appropriate EPA Hazardous Waste Codes.

IVb.C.2. Prohibited Waste

The Permittee shall not store, manage or treat any hazardous waste that does not

comply with Permit Condition IVb.C.1.

IVb.D. DESIGN AND CONSTRUCTION STANDARDS

The Permittee shall ensure that the foundation, structural support, seams, connections, and pressure controls (where applicable) shall be adequately designed, according to 40 CFR 267.191.

IVb.D.1. Design Standard for New Tanks and Ancillary Equipment
[Note: this condition only applies to new tanks. If the tanks to be permitted are all existing tanks, insert "Not applicable. This Permit shall only cover existing tanks."]

The Permittee shall obtain a written assessment, reviewed and certified by an independent, qualified registered professional engineer, pursuant to 40 CFR 270.11(d), attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating or hazardous waste, according to 40 CFR 267.191.

IVb.D.2. Corrosion Assessment for New Tanks and Components
[Note: this condition only applies to new tanks. If the tanks to be permitted are all existing tanks, insert "Not applicable. This Permit shall only cover existing tanks."]

The Permittee shall, for all new tank systems or components in which the external shell of a metal tank or any external metal component of the tank system will be in contact with the soil or water, provide a determination by a corrosion expert of the following factors that may affect the potential for corrosion, according to 40 CFR 267.191(c).

IVb.D.3. New Tank/Component Installation Inspection and Handling
[Note: this condition only applies to new tanks. If the tanks to be permitted are all existing tanks, insert "Not applicable. This Permit shall only cover existing tanks."]

The Permittee shall ensure that proper handling procedures are taken during installation to prevent damage to a new tank system and any of its components, according to 40 CFR 267.192

IVb.D.4. System Performance Testing for New Tank Systems

[Note: this condition only applies to new tanks. If the tanks to be permitted are all existing tanks, insert "Not applicable. This Permit shall only cover existing tanks."]

The Permittee shall test all new tanks and ancillary equipment for tightness prior to placing the system or component in use, according to 40 CFR 267.193.

IVb.D.5. Installation Requirements

[Note: this condition only applies to new tanks. If the tanks to be permitted are all existing tanks, insert "Not applicable. This Permit shall only cover existing tanks."]

The Permittee shall ensure the installation requirements of 40 CFR 267.194 are met.

IVb.E. SECONDARY CONTAINMENT

[The Permittee does not have to meet the secondary containment requirements in 40 CFR 267.195 if the tank systems do not contain free liquids and are situated inside a building with an impermeable floor. However, the Permittee must demonstrate the absence or presence of free liquids in the stored/ treated waste, using Method 9095 (Paint Filter Liquids Test) as described in "Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods," EPA Publication SW-846, as incorporated by reference in 40 CFR 260.11(b). The Permittee also does not have to meet the secondary containment requirements of 40 CFR 267.195(a) if the tank system, including sumps, as defined in 40 CFR 260.10, is part of a secondary containment system to collect or contain releases of hazardous wastes. If this applies to the Permittee, and secondary containment systems are not required, insert "Secondary containment is not required for the permitted tank system(s)." In addition, if the tank systems do not contain free liquids and are situated inside a building with an impermeable floor, this Permit Condition should also state "The Permittee shall demonstrate the absence or presence of free liquids in the stored/ treated waste, using Method 9095 (Paint Filter Liquids Test) as described in "Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods," EPA Publication SW-846, as incorporated by reference in 40 CFR 260.11(b). These records shall be maintained at the facility."]

[A containment building may serve as secondary containment (and external liner) for a tank system provided the building meets the requirements of 40 CFR 267.196(a). In addition, for a containment building to be acceptable as secondary containment for a tank system, the requirements of 40 CFR 267.195(a), (b)(1) and (2) must be met. (40 CFR

267.1107)]

IVb.E.1. Design and Construction

The Permittee shall provide secondary containment that meets the requirements of 40 CFR 267.195 for all new and existing tank systems.

IVb.E.2. Required Secondary Containment Design, Operation and Installation
[Note: this information should be provided for each tank system.]

Secondary containment for **[insert specific tank or tank system]** shall include **[insert: a liner (external to the tank), a vault, a double-walled tank, and/or an equivalent device]**, according to 40 CFR 267.196(a)

IVb.E.3. Ancillary Equipment

The Permittee shall provide ancillary equipment with secondary containment that meets the applicable requirements of 40 CFR 267.197.

IVb.F. OPERATING REQUIREMENTS

The Permittee shall not place hazardous wastes or treatment reagents in a tank system if the wastes could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail, according to 40 CFR 297.198.

The Permittee shall comply with the requirements of Permit Condition IVb.H. if a leak or spill occurs in the tank system.

IVb.G. SPECIAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE

[If no ignitable, reactive or incompatible wastes are to be stored or treated in the tank system, insert "Not applicable. The Permittee shall not store or treat any ignitable, reactive, or incompatible wastes in any part of the tank systems."]

The Permittee shall not place ignitable, reactive, or incompatible wastes in tank systems, unless the applicable conditions specified in 40 CFR 267.202 and 40 CFR 267.203 are met.

IVb.H. RESPONSE TO LEAKS OR SPILLS

In the event of a leak or a spill from a tank system or secondary containment system, the permittee must complete the actions specified in 40 CFR 267.200.

IVb.I. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall develop and follow a schedule and procedure for conducting inspections as specified in 40 CFR 267.199.

IVb.J. AIR EMISSION STANDARDS

The Permittee shall manage all hazardous waste placed in a tank or in the tank system(s) in accordance with the requirements of 40 CFR Part 264 Subparts AA, BB, and CC.

IVb.K. PREPARATION FOR CLOSURE

The closure plan, closure activities, cost estimates for closure, and financial responsibility for tank systems must meet all of the requirements specified in 40 CFR 267.201.

IVc - CONTAINMENT BUILDINGS

[Note: this permit module applies if the facility treats or stores hazardous waste in containment buildings, except as provided otherwise in 40 CFR Part 261 Subpart A or 40 CFR 264.1(f) and (g). Unique permit conditions may also be addressed in Module V, Supplemental Information. Storage and/or treatment in the containment building is not land disposal as defined in 40 CFR 268.2, if the unit complies with the Permit Conditions of this Module.]

[Note: if no containment buildings are in operation (or to be operated) at the permitted facility, insert "Not Applicable"]

IVc.A. GENERAL DESCRIPTION

[Insert a general description of the containment building(s). This includes a brief overview of each of the buildings, types of wastes to be handled, whether it will be used for storage or treatment, secondary containment, air emission controls (40 CFR Part 264 Subpart BB), etc.]

IVc.B. DESIGNATED CONTAINMENT BUILDING(S)

The Permittee shall store and/or treat hazardous wastes in the designated containment buildings described in Permit Condition IVc.A and as specified in Table IVc-1. The Permittee shall not store and/or treat waste in excess of the maximum capacities for each containment building identified in Table IVc-1.

TABLE IVc-1
[insert facility name or area name] Containment Building
Waste Types and Design Capacities

CONTAINMENT BUILDING & LOCATION	DESIGN SPECIFICATIONS	EPA HAZARDOUS WASTE TYPE	PRIMARY DESIGN BARRIER AND SECONDARY CONTAINMENT	MAXIMUM VOLUME OF WASTE Pounds (lb), Tons (T) or Cubic Yards (c.y.
[Building A-1, Room B1]	**[insert design specifications, dimensions, treatment or storage, materials of construction, additional design requirements is storing liquids, etc.]**	**[soils contaminated with specific K wastes]**	**[brief description]**	**[3,785 lb]**

IVc.C. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IVc.C.1. Permitted Waste

[Note: the permit writer should specify specific wastes (may refer to Table IVc-1) and waste form (solid, liquid or both).]

The Permittee may store hazardous waste at **[insert containment building(s)]**. Table IVc-1 above shows the maximum amounts of hazardous waste that the Permittee shall store within each containment building, subject to the terms of this Permit.

The Permittee may treat hazardous waste at **[insert containment building(s)]**. Table IVc-1 above shows the maximum amounts of hazardous waste that the Permittee shall treat within each containment, subject to the terms of this Permit.

The Permittee shall ensure that all waste solutions bear the appropriate EPA Hazardous Waste Codes.

IVc.C.2. Prohibited Waste

The Permittee shall not store, manage or treat any hazardous waste that does not comply with Permit Condition IVc.C.1.

IVc.D. DESIGN AND OPERATING STANDARDS

[Note: EPA shall consider standards established by professional organizations generally recognized by the industry such as the American Concrete Institute (ACI) and the American Society of Testing Materials (ASTM) in judging the structural integrity requirements of this permit condition. (40 CFR 267.1101)]

The Permittee shall ensure that the containment building(s) comply with the design and operating standards in this Permit Condition.

IVc.D.1. Design Criteria

The containment building shall be designed and built in accordance with the requirements of 40 CFR 267.1101.

IVc.D.2. Waste Compatibility

The Permittee shall ensure compatibility of the waste with the containment system, according to 40 CFR 267.1101(c) and (d).

IVc.E. SECONDARY CONTAINMENT

IVc.E.1. Design and Operating Standards

[Note: these conditions only apply if liquids will be stored or treated in the containment building. If no liquids will be present, insert "Not applicable. The containment building shall not be used to store or treat liquids."]

If, as determined by the paint filter test, by a visual examination, or by other appropriate means, the containment building shall be used to manage hazardous wastes containing free liquids or treated with free liquids, the Permittee shall comply with the requirements of 40 CFR 267.1103

IVc.E.2. Mixed Secondary Containment

[Note: this permit condition only applies to containment buildings with areas that require secondary containment and areas that do not. If the containment building does not have areas both with and without secondary containment, insert "Not applicable. The containment building does not have areas both with and without secondary containment."]

For containment building where there are areas requiring secondary containment and areas not requiring secondary containment, the Permittee shall ensure that the containment building is designed and operated according to 40 CFR 267.1105.

IVc.E.3. Waiver from Secondary Containment

Notwithstanding any other provision of this Permit, the Regional Administrator may waive requirements for secondary containment for a permitted containment building where the Permittee fulfills the criteria at 40 CFR 267.1104.

IVc.F. PREVENTION OF RELEASES

The Permittee shall use controls and practices to ensure containment of the hazardous waste within the unit, according to 40 CFR 267.1102(a), (b), and (c).

IVc.G. SPECIAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE

[If no ignitable, reactive or incompatible wastes are to be stored or treated in the containment building, insert "Not applicable. The Permittee shall not store or treat any ignitable, reactive, or incompatible wastes in any area of the containment building."]

The Permittee shall not place ignitable, reactive, or incompatible wastes in the containment building, unless the requirements of 40 CFR 267.17 are met.

IVc.H. RESPONSE TO LEAKS OR SPILLS

Throughout the active life of the containment building, if the Permittee detects a condition that could lead to or has caused a release of hazardous waste, the Permittee shall repair the condition promptly, and follow the requirements of 40 CFR 267.1106.

IVc.I. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall comply with the inspection schedules and procedures contained in Permit Condition III.D. [40 CFR 267.1101(g)]

IVc.J. AIR EMISSION STANDARDS

The Permittee shall manage all hazardous waste placed in the containment building in accordance with the requirements of 40 CFR Part 264 Subpart BB.

IVc.K. PREPARATION FOR CLOSURE

Upon removal of the containment building from operation and in preparation for closure, the Permittee meet the requirements of 40 CFR 267.1108.

MODULE V - SUPPLEMENTAL INFORMATION

[Appropriate facility-specific conditions, if any, should be made and included as conditions of the draft permit. These proposed facility-specific conditions would go beyond the nationwide conditions in the uniform portion of the standardized permit. The site-specific conditions that would be imposed are those that are necessary for corrective action purposes or otherwise to ensure protection of human health and the environment. The permit writer may impose permit conditions necessary for corrective action purposes comes from RCRA section 3004(u) and (v) and EPA regulations at 40 CFR 267.101. Authority (and your obligation) to impose permit conditions that ensure protection of human health and the environment (including conditions requiring cleanup of any contamination not subject to 3004(u) and (v)) comes from the "omnibus" provision of RCRA section 3005(c)(3) and EPA regulations at 40 CFR 270.32(b)(2). It is anticipated that in certain cases communities may raise the need for site-specific conditions, or actually propose such conditions, during the proposed pre-application meeting.

If some of the general design or management standards of 40 CFR Part 267 are not adequate for a particular facility, more stringent standards would be necessary. However, if more stringent standards are necessary for a particular facility, add those conditions in this supplemental portion of the standardized permit. In some situations, there may be no need for additional site-specific conditions to satisfy regulatory requirements or to ensure protection of human health and the environment, and that a facility could operate under the terms of the uniform portion of the permit alone. In these situations, no additional conditions, beyond those in the uniform portion, would be written in this Module as part of the draft permit.

This Module is retained to allow for special site-specific information.

The information to be contained herein is to be determined on a site-specific basis by Director. This may include Compliance Schedules or corrective action. If no Supplemental Information is necessary, insert "Not Applicable".]

MODULE VI - RELEASES FROM SOLID WASTE MANAGEMENT UNITS

[Note: this Permit Condition applies if the Permittee treats or stores hazardous waste under a 40 CFR Part 270, Subpart I standardized permit, except as provided in 40 CFR 267.1(b), or unless the facility currently has a permit that imposes requirements for corrective action under 40 CFR 264.101. If releases from solid waste management units do not apply to the facility, insert the terms "Not Applicable" and provide a brief discussion of the basis for the exemption.

This Permit Condition should not be used to specify facility-specific permit conditions for corrective action, but only general, non-facility-specific terms related to corrective action. Facility-specific corrective action measures should be addressed in Module V, Supplemental Information.]

VI.A. GENERAL DESCRIPTION

The Permittee shall institute corrective action as necessary to protect human health and the environment meeting the requirements of 40 CFR 267.101.

VI.B. RELEASES

Specific corrective action permit conditions are specified in the supplemental portion (Module V) of this standardized permit, in accordance with this Permit Condition and 40 CFR Part 264, Subpart S. [40 CFR 267.101(b)]

VI.C. SCHEDULES OF COMPLIANCE AND FINANCIAL RESPONSIBILITY

The permittee shall demonstrate compliance with Schedules of Compliance for corrective action (where corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing corrective action are specified in the supplemental portion (Module V) of this Permit. [40 CFR 267.101(b)]

VI.D. IMPLEMENTATION BEYOND FACILITY PROPERTY BOUNDARY

The Permittee shall implement corrective action beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Director that, despite best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. In addition, the Permittee shall not be relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where

off -site access is denied. On-site measures to address such releases shall be determined on a case-by-case basis, and shall be addressed in Module V of this Permit. The Permittee shall provide assurances of financial responsibility for corrective action of off-site releases. [40 CFR 267.101(c)]

MODULE VII - FINANCIAL REQUIREMENTS AND LIABILITY

[The Permit Conditions for financial and liability requirements apply to the Permittee who treat or store hazardous waste under this standardized permit, except as provided in 40 CFR 267.1(b), or if the Permittee is a State or Federal government. If the Permittee is exempt from these requirements, insert the terms "Not Applicable" for this Module and provide a brief discussion for the basis of the exemption.]

[For Permittees subject to the financial and liability requirements, the Permittee shall be required to prepare a closure cost estimate, demonstrate financial assurance for closure, and demonstrate financial assurance for liability. In addition, the Permittee shall notify the Director is named as a debtor in a bankruptcy proceeding under Title 11 (Bankruptcy), U.S. Code.]

VII.A. FINANCIAL ASSURANCE UNDER SUBPART H OF 40 CFR 267 SUBPART H

The permittee must comply continuously with the requirements of 40 CFR 267 Subpart H.

VII.B. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION UNDER 40 CFR 267.101

[This section of the permit should contain information on how the permittee must comply with the financial assurance for corrective action requirements. Because the regulations for financial assurance for corrective action are less detailed than those for closure, the permitting authority should consider factors such as when to require financial assurance for corrective action, how to estimate the amount that must be assured, and how the instrument should be worded to ensure that funds will be available for corrective action as needed and be disbursed with the approval of the permitting authority.]

ATTACHMENT 1 - WASTE ANALYSIS PLAN

This Attachment has only been provided to serve as a guide to what the facility should have in their Waste Analysis Plan (WAP). Under a standardized permit, the facility is not required to have the WAP as part of the permit, but rather the WAP is a document maintained at the facility.

The WAP should describe the methodologies for conducting the analyses required to properly treat or store hazardous wastes in compliance with 40 CFR Parts 267 and 268 and with the conditions of the permit.

The WAP should provide for how compatibility of waste with containers and secondary containment materials (if applicable) will be demonstrated. If the facility does not intend to have secondary containment systems or wastes with free liquids, the WAP should provide test procedures and results, or other documentation, which shows that the wastes do not contain free liquids. The suggested test for free liquids if the Paint Filter Liquids Test, Method 9095 in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," EPA Publication No. SW-846.

Examples of waste profile forms or other forms of documentation used in the WAP should be provided.

1. FACILITY DESCRIPTION

A brief discussion of the facility and the general types of waste to be managed (stored or treated) in the container storage areas and the types of processes or activities that generate waste. If the containers will be used for treatment, then activities conducted to mix or blend wastes should be discussed; waste compatibility should be addressed.

2. WASTE IDENTIFICATION

A detailed discussion of all the wastes and waste streams to be stored, managed or treated in the permitted tank systems. Typically this information is tabulated and should also contain EPA Waste Codes. If the wastes are subject to land disposal restrictions (LDR) requirements, then this should be addressed. Generators have special waste analysis requirements under the LDR program. 40 CFR 268.7 requires generators to conduct waste analysis to determine the regulatory status of the waste with respect to the treatment standards prior to land disposal.

3. PARAMETERS AND RATIONALE

This should list each of the parameters that have been chosen for analysis and should also provide an explanation for the rationale behind the selection of these parameters. This section of the WAP should address:

a. All selected parameters to be analyzed for;

b. Rationale for selected parameters;
c. Wastes to be managed and their hazard characteristics (this should also address treated wastes and end products and by-products of treatment);
d. Hazardous waste treatment processes and appropriateness of parameters to be analyzed for to those processes;
e. Process tolerance limits;
f. Waste characterization data;
g. Reactive or ignitable wastes;
h. Potential incompatible wastes;
i. Physical states of wastes (solid, liquid or gas);
j. Physical properties; and
k. Sources of wastes and variability of waste composition.

4. TEST METHODS

Each test method (test name and reference, e.g., EPA Test No.) should be provided that will be used for each of the chosen parameters. Specifically, this section of the WAP should address:

a. Test parameters;
b. Physical state of samples;
c. Wastes and waste constituents;
d. Potential interferences;
e. Test methods;
f. Acceptability of test methods;
g. Accuracy and limits of detection; and
h. Quality assurance and quality control (QA/QC) program.

5. SAMPLING METHODS

This section should identify and reference (e.g, ASTM) the sampling methods that will be used to obtain a representative sampling of each waste to be analyzed. This section should also provide a discussion of why the chosen method is appropriate for the type and nature of the waste, and specifically should address:

a. Physical state of wastes;
b. Potential for layered waste;
c. Sampling devices, sampling equipment, and procedures;
d. Locations of sampling;
e. Randomness or representativeness of samples;
f. Composite versus grab samples;
g. Frequency of sampling and analysis;
h. Sample containers;
i. Method of identifying samples;
j. Chain-of-custody procedures;

k. Preservation of samples;
l. Holding times; and
m. QA/QC program.

6. PROCESS KNOWLEDGE/ACCEPTABLE KNOWLEDGE

If acceptable knowledge is utilized to characterize the wastes, then the WAP must describe in detail the process used to characterize the waste. The process must be documented and supporting data provided.

7. ADDITIONAL REQUIREMENTS FOR WASTES GENERATED OFF-SITE

This section of the WAP should address:

a. Nature of wastes to be received from off-site;
b. Volume of shipments and variability or waste composition;
c. Pre-acceptance testing;
d. Physical states of wastes;
e. Potential for layering of waste;
f. Physical inspection and fingerprint analysis of incoming waste loads;
g. Sampling devices and procedures for fingerprinting of incoming waste loads;
h. Fingerprint analysis methods;
i. Re-analysis procedures when test results are inconsistent with previous data;
j. Criteria for waste acceptance/rejection;
k. Procedure for returning or rerouting rejected waste loads;
l. Statistical basis for number of samples; and
m. QA/QC program.

8. ADDITIONAL WASTE REQUIREMENTS

The facility will need to demonstrate compliance with the 40 CFR Part 264 Subparts AA, BB, and CC air emission standards.

9. DEMONSTRATION OF TREATMENT EFFECTIVENESS

If the Permittee intends to treat waste, a demonstration of the effectiveness of waste treatment and the appropriateness of the selected treatment method should be provided. This must also be provided if treatment is required for compliance with LDR standards for prior to shipment of waste to a disposal facility.

ATTACHMENT 2 - PERSONNEL TRAINING

This Attachment serves as an outline for the basis elements that should be included in the site personnel training program.

1. OUTLINE OF TRAINING PROGRAM

This section should contain an outline of both introductory and continuing training programs by the Permittee to prepare personnel to operate or maintain the facility in a safe manner and in compliance with the conditions of the permit. A brief description of how training will be designed to meet actual job tasks should be provided. Both formal class room training and on-the-job training should be discussed. The outline should indicate the length of time established for the introductory, continuing training, and annual training (e.g., 16 hours for introductory training).

1.2 Job Titles and Descriptions

The job title and job description should be provided for each position at the facility that is related to hazardous waste management.

1.3 Training Content, Frequency and Techniques

The plan should describe the content, frequency and techniques used in both introductory and continuing training for each employee and job position. The training requirements (including those related to implementation of the contingency plan) and relevance of the training for each job position should be provided.

1.4 Training Director

It should name the training director and demonstrate that the training director is a person trained in hazardous waste management procedures (i.e., individual resume, documentation of his training, experience, etc.). The plan should stipulate that the training director will teach employees hazardous waste management procedures and contingency plan implementation relative to employment position.

1.5 Training for Emergency Response

The training plan should demonstrate that facility personnel will be able to respond effectively to emergencies. This should be accomplished through training personnel in emergency procedures, emergency equipment, and emergency systems. Training which includes the Contingency Plan should be discussed. As applicable to specific job positions, the training program should also include:

- Procedures for using, inspecting, repairing, and replacing facility emergency and

monitoring equipment;
- How to identify and operate the key parameters for automatic waste feed cut-off systems;
- Locations of and how to operate communication systems and alarm systems;
- Procedures for responding to fires;
- Procedures for providing response to incidents of groundwater contamination; and
- How to shutdown all operations in the event of an emergency.

2. IMPLEMENTATION OF TRAINING PROGRAM

The plan should indicate that all training must be successfully completed by facility personnel within six months of their employment, assignment to the facility, or transfer to a new position within the facility, whichever is later. The plan should also stipulate that for employees hired after the effective date of these requirements, the employee must not work in unsupervised positions until they have completed the training requirements.

3. ANNUAL REVIEW

The plan should stipulate that an annual review of the initial training received for each employee will be conducted as part of the continuing education training.

4. DOCUMENTATION AND RECORDKEEPING

The section of the plan should provide documentation that the training requirements for each employee have been met and that records of the training will be maintained. The Permittee should maintain the following documentation on-site:

4.1 Job Title/Job Description

For each position at the facility that is related to hazardous waste management, a specific job title should be assigned. The facility should provide the name of each employee currently filling each job position. In addition, a written description for each position should be maintained. The description should include, at a minimum, the requisite skill(s) required for the position, education level necessary, all other required qualifications, and the duties required of each employee for the position.

4.2 Training Content, Frequency and Techniques

The plan should specify what training is required for each job position. This should include both introductory and continuing training. The plan should also provide the frequency for continuing training (e.g., annual refresher). A description of the each specific training “course” should be provided. If on-the-job training is included as part of the continuing training, this should also be detailed.

4.3 Record of Training

The plan should stipulate that training and job experiences for each personnel shall be documented to be maintained on-site.

4.4 Recordkeeping

The plan should indicate that all training records for all current employees will be maintained on-site until the time of facility closure. In addition, the plan should provide that all training records for former employees will be maintained for at least three years from the last day the employee worked at the facility. The plan should provide how training records from personnel from a previous company will be incorporated into the employee file. The plan should also include where on-site personnel training records will be maintained.

ATTACHMENT 3 - CONTINGENCY PLAN

The Contingency Plan or Spill Prevention Control and Countermeasures (SPCC) Plan, as amended for hazardous waste, should describe the actions facility personnel will take to minimize hazards to human health and the environment in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste constituents to the air, soil, or surface water at the facility. The information contained in the Contingency Plan will supplement the conditions of the Permit (Permit Condition III.I)

1. GENERAL INFORMATION

1. Facility Information

This should include the facility name, operator, site plan and description of facility operations.

1.2 Maintenance of Copies

The Contingency Plan must be maintained at the facility. This section should provide the location of where the Plan is maintained and accessible on-site.

2. IMPLEMENTATION

This section should describe how and when the Contingency Plan will be implemented.

3. EMERGENCY COORDINATOR

Provide the names, addresses, office and home telephone numbers, and duties of the primary and alternate coordinators. In addition, a statement of authorization of the coordinator to commit necessary resources to plan responses should be provided.

4. EMERGENCY EQUIPMENT

Provide a list of all emergency equipment at each building or area at the facility. This information may be tabulated, but it should list all emergency equipment and exact location of the equipment within the building, area, etc.

4.1 Fire Control Equipment

Provide a list of all fire control equipment and the location of these devices. In addition, the plan should provide a description of the general capabilities of each piece of equipment. If any wastes require special treatment in the event of a fire, it should be discussed.

Fire equipment addressed in the plan should include but not be limited to fire extinguishers (e.g., dry chemical), fire alarm pull boxes and/or push button stations, automatic fire suppression sprinkler systems, automatic thermal alarms, and fire hydrants.

4.2 Spill Control Equipment

Discuss all spill control equipment and the location of this equipment. This may include secondary containment systems, absorptive materials, dike, berms, and spill alarm systems. The Contingency Plan should also discuss any special waste handling procedures in the event of a spill.

4.3 Communication Equipment

All communication devices should be discussed and the location of these devices provide. Communication devices include, but are not limited to telephones, two-way radios, fire alarms, drop-box push stations, evacuation alarms, continuous air monitoring alarms, ventilation alarms, the public address (PA) system, and a site-wide paging system.

4.4 Decontamination Equipment

In the event of a spill or leak, personnel decontamination equipment will be required. The location of all decontamination equipment should be provided. Often, a facility map indicating locations of personnel decontamination equipment (e.g., eyewash) will be included as part of the Contingency Plan. In addition, capabilities of equipment should be provided. If the facility manages any waste requiring special decontamination procedures, this should be discussed in detail. Decontamination equipment should include items such as safety showers, eyewash stations, and Material Safety Data Sheets (MSDS).

4.5 Personal Protective Equipment (PPE)

Discuss what levels of PPE will be required for a given spill or leak. The locations of all PPE should be provided. PPE discussed should include, as appropriate, respirators, respirator canisters/cartridges, self-contained breathing apparatus (SCBA), PPE clothing, and locations of change rooms.

4.6 Other

Other site-specific emergency equipment should be discussed. For example, this may include equipment such as transportation vehicles, potable emergency generators, front end loaders, and forklifts. The locations of these items on-site should be provided.

5. EMERGENCY PROCEDURES FOR CONTAINER SPILLS OR LEAKS

5.1 Immediate Actions

Specify procedures to be used when responding to container spills or leakage. This section should also include procedures and timing for expeditious removal of spilled wastes and repair of replacement of the container(s).

5.2 Notification

Describe the methodology for immediate notification of facility personnel and necessary state or local authorities. This should include notification of the on-scene coordinator for the areas or the National Response Center.

5.3 Identification of Hazardous Materials

Describe the procedures for identification of hazardous materials involved in an emergency.

5.4 Assessment

Describe the criteria that will be used to assess the possible hazards to human health and the environment as a result of a fire, release, or explosion, and the need for evacuation and notification of authorities.

5.5 Control Procedures

Specify specific controls that will be taken in the event of a fire, release, or explosion.

5.6 Prevention of Recurrence or Spread

Describe the necessary steps to be taken to ensure that fires, releases, or explosions do not occur, reoccur or spread to other hazardous wastes at the facility.

5.7 Storage and Treatment of Released Material

Provide for treatment, storage, or disposal of any material that results from a fire, release, or explosion at the facility.

5.8 Incompatible Wastes

Describe the provisions for prevention of incompatible waste from being treated, stored or located in the affected areas until clean-up procedures are completed. This may also include a discussion of removal of potentially incompatible wastes from an area in the event of a fire, release, or explosion.

6. EVACUATION PLAN

The Contingency Plan should contain clearly written evacuation routes and muster areas for the facility. In addition, a map clearly illustrating these evacuation routes and muster areas should be included. The evacuation maps should also be posted in or near all work areas, with the locations of the maps provided in the Contingency Plan. This section should also include any special instructions specific to the facility.

7. COORDINATING AGREEMENTS

Describe the coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of an emergency. Documentation of refusal to enter into a coordination agreement should be contained in the Contingency Plan.

8. POST EMERGENCY PROCEDURES

Describe the procedures for ensuring that all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resume.

9. NOTIFICATION AND RECORD KEEPING

This section should outline the recordkeeping and notification requirements of 40 CFR 267.58. This should include notifying the Director, and appropriate State and local authorities, that the facility is in compliance with the Permit (Permit Condition III.I.7) before operations are resumed in the affected area(s) of the facility.

The Contingency Plan should stipulate that the Emergency Coordinator will note the time, date, and details of any incident that requires implementing the contingency plan in the operating record. In addition, the Plan should detail that within 15 days after the incident, the Emergency Coordinator will submit a written report on the incident to the Director and that this report will include the following in the report:

a. The name, address, and telephone number of the owner or operator (Permittee);

b. The name, address, and telephone number of the facility;

c. The date, time, and type of incident (e.g., fire, explosion);

d. The name and quantity of material(s) involved;

e. The extent of injuries, if any;

f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. The estimated quantity and disposition of recovered material that resulted from the incident.

ATTACHMENT 4 - CLOSURE PLAN

Under a standardized permit, the closure plan must be submitted to the Director with the Notice of Intent. The closure plan must meet the requirements of 40 CFR Part 267 Subpart G as well as the requirements in 40 CFR 267.173, 267.201, and 267.1108. This attachment provides a general guide to the type of information that should be included in the closure plan. The closure plan should include a description of how each container storage area will be closed and provide a description of how final facility closure will be conducted. Under a standardized permit, clean closure is the desired endpoint. However, if clean closure can not be obtained, the Permittee is required to obtain an individual post-closure permit, that is separate from the standardized permit.

1. CLOSURE PERFORMANCE STANDARD

This should describe how closure will minimize the need for further maintenance. The section should include what controls will be in place to either minimize or eliminate the potential of escape of hazardous waste, hazardous waste constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground, surface water or groundwater once closure is complete. For the standardized permit, this should result in the removal of all hazardous wastes and hazardous waste byproducts and the decontamination of all environmental media.

Cleanup levels for potentially contaminated soil, surface water and/or groundwater, as applicable, should also be discussed.

This section of the Closure Plan should also discuss how closure will comply with the closure requirements of 40 CFR Part 267 Subpart G and any unit-specific closure requirements of the permit.

2. FINAL CLOSURE ACTIVITIES

This section should describe all the activities necessary to obtain final closure. For container storage areas, the closure plan should describe how all hazardous waste and hazardous waste residue will be removed form the secondary containment system(s), and how remaining containers, container liners, bases, and soil containing or contaminated with hazardous waste ro hazardous waste residues will be decontaminated or removed. The following sections should address: hazardous waste removal and disposal; container decontamination and disposal; site decontamination and disposal of linings, soils, washes, etc.; verification of decontamination; and maximum inventories.

2.1 Methodologies for Closure

Describe what methods will be used to reach closure.

2.2 Maximum Extent of Operations

Describe the maximum extent of operations that will be active at the facility during closure and for the life of the facility.

2.3 Maximum Waste Inventory

Describe the maximum inventory of wastes that could be in storage, treatment, or disposal at anytime during the active life of the facility. If multiple container storage areas are present, describe the sequence in which the unit will be operated during the active life of the facility and the order in which they will be closed.

2.4 Inventory Removal

Discuss the methods for removing, transporting, treating, storing, or disposing of all hazardous waste. Identify the type(s) of off-site hazardous waste management units that are to be used.

2.5 Decontamination and Verification

2.5.1 Decontamination of Containers, Container Liners, Bases, and Soil

Associated with the closure of each container storage area, provide a detailed description of the steps needed to decontaminated or dispose of all containers, container liners, bases, and soils. The following should be included:

- Decontamination procedures;
- Criteria for determining decontamination;
- List of all containers and liners;
- List of all bases on which containers were placed or were part of secondary containment;
- Description and amounts of potentially contaminated soil;
- Disposal of contaminated materials, including containers, liners, base materials, and soils; and
- Decontamination of cleanup materials and equipment.

2.5.2 Decontamination Verification

Demonstrate the decontamination has been effective and meets the performance standards have been met. Also demonstrate that any hazardous constituents left at the unit will not impact any environmental media in excess of EPA-established exposure levels and that direct contact with these constituents will not pose a threat to either human health or the environment.

2.6 Miscellaneous Activities

Describe any site-specific miscellaneous activities as applicable.

3. SAMPLING AND ANALYTICAL PROCEDURES

This section should describe the procedures and methods for sampling, analysis, and documentation applicable to closure activities. It is recommended that all sampling and analysis be conducted in accordance with EPA-approved procedures, such as those in *SW-846*.

3.1 Soil Sampling

Provide the sampling procedures to be used for the collection of soils. Include sampling methods, sample depths, location and number of samples. Also describe background soil locations and methods for determining background soil concentrations.

3.2 Liquid Sampling

Provide the sampling procedures to be used for the collection of liquids, including decontamination liquids and surface water, if applicable. Include sampling methods, sample depths, location and number of samples. Also describe background levels and methods for determining background concentrations.

3.3 Cleaning of Sampling Equipment

Provide methods for cleaning of sampling equipment in between sample locations.

3.4 Sample Handling and Documentation

Discuss where samples will be analyzed. Discuss sample labeling, sample containers, sample preservation, packaging and sealing, and chain-of-custodies. Discuss information that will be documented in a field log book at the time of each sampling event (e.g., location of sample, date and time of sample, sampling team members, field measurements, etc.).

3.5 Analytical Procedures

List the procedures and/or methods that will be used for sample analysis, including the test methods for each parameter or groups of parameters. Include a discussion of samples for laboratory quality assurance/quality control (QA/QC). Provide target detection limits.

3.6 Field and Laboratory QA/QC

Discuss field QC activities, such as duplicate samples, trip blanks, field blanks and equipment rinsate blanks. Discuss the frequency at which these samples will be taken.

Discuss field calibration of instruments, if applicable.

4. SCHEDULE FOR CLOSURE

Include a schedule for closure. The schedule should include from the approval of the closure plan through final submission of the closure plan to the Director. Table 5-1 is an abbreviated example of a closure schedule.

TABLE 5-1
Closure Schedule for Container storage areas at ABC Chemical

ACTIVITY	MAXIMUM TIME REQUIRED
Notification of intent to close	-90 days
Begin closure activities (removal of wastes and decontamination)	Day 10
Analyze samples	Day 50
Perform final cleanup (removal of decontamination wastes and equipment)	Day 120
Verification of decontamination	Day 150
Submit Closure Report to Director	Day 180

5. COST ESTIMATE FOR CLOSURE

A closure cost estimate should be submitted, although it may be submitted separate from the closure plan. The cost estimate should comply with the terms of the permit, Permit Module VII.

6. POST-CLOSURE

Under a standardized permit, clean closure is required. However, in the event that a facility can not obtain clean closure, an individual post-closure permit must be obtained by the Permittee. This post-closure permit would be separate from this standardized permit. However, in order for the Permittee to still be in compliance with this permit, the Permittee would still be required to remove all waste, decontaminate the storage unit and clean up any spills during closure.

ATTACHMENT 5 - ENGINEERING SPECIFICATION

The Permittee should submit engineering drawings as applicable. Engineering drawings may include:

- Detailed drawings of the container storage area, including container layout, location of aisles, containment systems, drainage controls, and dimensions;
- Facility drawings;
- Self-containment pallets or other secondary containment systems;
- Container specifications;
- Liner specifications; and
- Containment calculations.