



COMPLETENESS/TECHNICAL CHECKLIST FOR PURPOSES OF PUBLIC PARTICIPATION OPERATING FACILITIES

(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](#))

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

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

40 CFR 270.14 - Contents of Part B: General Requirements: [\(click here for link\)](#)

General Facility Description: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(1\)](#)?

Chemical Analysis of Waste: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(2\)](#)?

Waste Analysis Plan (WAP): (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(3\)](#) & [40 CFR 264.13](#)?

Guidance:

Waste Analysis Plan [\(alternate link\)](#) (EPA)

Waste Analysis Plan BIF's (EPA)

Security Procedures and Equipment: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(4\)](#) & [40 CFR 264.14](#)?

General Inspection Schedule: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(5\)](#) & [40 CFR 264.15](#)

Preparedness and Prevention: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(6\)](#) & [40 CFR 264.30-37](#)?

Contingency Plan: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(7\)](#) , [40 CFR 264.50-56](#) & [10 CSR 25-7.264\(2\)\(D\)](#)?

Hazard Prevention: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(8\)](#)?

Precautions to Prevent Accidental Ignition or Reaction of Ignitable, Reactive, or Incompatible Wastes: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(9\)](#) & [40 CFR 264.17](#)?

Traffic Patterns: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(10\)](#)?

Facility Location Information i.e. Earthquake/Floodplain: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(11\)](#) & [10 CSR 25-7.270.14\(2\)\(B\)\(4\)](#)?
*40 CFR 270.14(b)(11)(i) & (ii) are not incorporated into 10 CSR 25-7.270.14(2)(B)

Personnel Training: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(12\)](#) & [40 CFR 264.16](#)?

Closure/Post Closure Plan: (Section ____ of permit, pg# ____)

_____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(13\)](#) , [40 CFR 264.110-120](#) & [10 CSR 25-7.264\(2\)\(G\)](#)?

Guidance:

Closure\Post-Closure Guidance (EPA)

Closed Hazardous Waste Unit Documentation: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(14\)](#) & [40 CFR 264.119](#)?

Closure/Post Closure Cost Estimate: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(15-16\)](#) & [40 CFR 264.140-151](#)?

Guidance:

Closure Plan\Cost Estimate Guidance (EPA)

EPA DOC # [530SW87010](#)

Corrective Action (EPA)

Copy of the Insurance Policy or Other Documentation Which Comprises Compliance
With the Requirements: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(17\)](#) , [40 CFR 264.147](#), & [10 CSR 25-7.264\(2\)\(H\)](#)?

Proof of Coverage by a State Financial Mechanism: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements per
[40 CFR 270.14\(b\)\(18\)](#) & [40 CFR 264.149](#)?

Topographic Map: (Section ____ of permit, pg# ____)

____ Does facility submission contain appropriate requirements
per [40 CFR 270.14\(b\)\(19\)](#) & [10 CSR 25-7.270.14\(2\)\(B\)\(3\)](#) & [10 CSR 25-7.270.14\(2\)\(B\)\(5\)](#)?

____ Information as may be necessary to enable the Regional Administrator to carry out his
duties under other Federal laws as required in 40 CFR 270.3 [40 CFR 270.14(b)(20)]

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

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&status=listeds

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

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

- ____ NA For land disposal facilities, if a case-by-case extension has been approved under [40 CFR 268.5](#) or a petition has been approved under [40 CFR 268.6](#), a copy of the notice of approval for the extension or petition is required. [40 CFR 270.14(b)(21)] *Covers underground injection wells. Underground injection of hazardous waste is prohibited in Missouri per [260.424 RSMo](#).
- ____ A summary of the pre-application meeting (Any changes equivalent to a Class 3 modification?) [40 CFR 270.14(b)(22) & [40 CFR 124.31\(c\)](#)]

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](#))

Please use the SWMU Form (separate form)

(Section _____ of permit, pg# _____)

- ____ 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]

40 CFR 270.15 - Specific Part B Requirements for Containers: [\(click here for link\)](#)

_____ 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 270.19 - Specific Part B Requirements for Incinerators:

(Transitioned into Title V) ([click here for link](#))

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 270.22 - Specific Part B Requirements for BIF's Burning Hazardous Waste: (Transitioned into Title V) [\(click here for link\)](#)

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]

Other Requirements:

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

- _____ Health Profile for Treatment or Disposal Facilities [10 CSR 25-7.264(2)(P)]
- _____ Missouri Application Form with Attachments and Certification
[Section 260.395.7.1(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.]
- _____ 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.]
- _____ Name, address and telephone number for the closest public library [10 CSR 25-8.124(1)(A)10.C.(I)(e.)]
- _____ 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.)]

- _____ Habitual Violator Information [260.379 RSMo, 260.395.16 RSMo, 10 CSR 25-7.270(2)(H) and 10 CSR 25-7.270(2)(B)(11).] [\(click here for form\).](#)
- _____ Rail Car Management Plan provided. [10 CSR 25-7.270(2)(B)(18).]
- _____ 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?
[\(click EPA EJ homepage\)](#) [\(click EJ Screening Toolkit\)](#)