

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS				
SECTION F. PROCEDURES TO PREVENT HAZARDS				
	Section and Requirement	Federal Regulation	Review Consideration ^a	See Attached Comment Number ^c
F-1	Security	270.14(b)(4); 264.14		
F-1a	Security Procedures and Equipment	270.14(b)(4); 264.14	Unless waiver is granted, facility must have surveillance system or a barrier to entry.	
F-1a(1)	24-Hour Surveillance System	270.14(b)(4); 264.14	Monitor/camera, guards, or personnel must continuously monitor or control access to active parts of facility.	
F-1a(2)(a)	Barrier	270.14(b)(4); 264.14	This item required if 24-hour surveillance system is not feasible. Describe artificial or natural barrier.	
F-1a(2)(b)	Means to Control Entry	270.14(b)(4); 264.14	This item required if 24-hour surveillance system is not feasible.	
F-1a(3)	Warning Signs	270.14(b)(4); 264.14	Signs in english must be posted at each entrance, and be legible from 25 feet.	
F-1b	Waiver	270.14(b)(4); 264.14	Owner/operator must prevent unknowing entry, and minimize unauthorized entry of persons or livestock unless can demonstrate:	
F-1b(1)	Injury to Intruder	270.14(b)(4); 264.14	Assure physical contact with waste, structure, or equipment will not injure unknowing intruder.	
F-1b(2)	Violation Caused by Intruder	270.14(b)(4); 264.14	Assure disturbance of waste or equipment by unauthorized intruder will not cause a violation.	
F-2	Inspection Schedule	270.14(b)(5); 264.15	Inspection is required for monitoring equipment, safety emergency equipment, communication and alarm systems,	

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		decontamination equipment, security devices, and operating and structural equipment.		
F-2a	General Inspection Requirements	270.14(b)(5); 264.15(a),(b); 264.33		
F-2a(1)	Types of Problems	270.14(b)(5); 264.15(b)(3)	Inspection checklist must identify types of problem.	
F-2a(2)	Frequency of Inspections	270.14(b)(5); 264.15(b)(4)	Based on rate of deterioration of equipment and probability of environmental or human health incident.	
F-2a(3)	Schedule of Remedial Action	270.14(b)(5); 264.15(c)	Owner/operator must immediately remedy any deterioration or malfunction of equipment or structures to ensure problem does not lead to environmental or human health hazard.	
F-2a(4)	Inspection Log	270.14(b)(5); 264.15(d)	Provide example log or summary.	
F-2b	Specific Process Inspection Requirements	270.14(b)(5)		
F-2b(1)	Container Inspection	270.14(b)(5); 264.174	Inspect at least weekly.	
F-2b(2)	Tank System Inspection	270.14(b)(5); 264.195	Owner/operator must develop schedule and inspect at least once daily.	
F-2b(2)(a)	Tank System External Corrosion and Releases	270.14(b)(5); 264.195(b)(1)	Owner/operator must inspect that aboveground portion and check for corrosion.	

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F-2b(2)(b)	Tank System Construction Materials and Surrounding Area	270.14(b)(5); 264.195(b)(3)	Observe construction materials and area around external portion for signs of release of hazardous waste.		
F-2b(2)(c)	Tank System Overfilling Control Equipment	270.14(b)(5); 264.195(a)	Develop and follow schedule for inspection of overfill controls.		
F-2b(2)(d)	Tank System Monitoring and Leak Detection Equipment	270.14(b)(5); 264.195(b)(2)	Analyze data gathered from monitoring equipment to ensure tank is operating according to design.		
F-2b(2)(e)	Tank System Cathodic Protection	270.14(b)(5); 264.195(c)	Inspect according to schedule.		
F-2b(3)	Waste Pile Inspection	270.14(b)(5); 270.18(d); 264.254(b)	Describe how waste pile will be inspected daily and after storms.		
F-2b(3)(a)	Runon and Runoff Control System	270.14(b)(5); 264.254(b)(1)	Inspections should identify deterioration, malfunction, or improper operation of control system.		
F-2b(3)(b)	Wind Dispersal System	270.14(b)(5); 264.254(b)(2)	Facility should inspect proper function of wind dispersal system.		
F-2b(3)(c)	Leachate Collection and Removal System	270.14(b)(5); 270.18 (d); 264.254(b)(3), (c)	Determine whether there is leachate present in functioning double liner system.		
F-2b(4)	Surface Impoundment Inspection	270.14(b)(5); 270.17(c); 264.226(b),(c)	Describe how each surface impoundment will be inspected to meet requirements of monitoring and inspection and waiver requirement.		
F-2b(4)(a)	Condition Assessment	270.14(b)(5);	Describe how surface impoundment will be		

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		264.226(b)	inspected weekly and after storms.		
F-2b(4)(a)(1)	Overtopping Control System	270.14(b)(5); 264.226(b)(1)	Inspect for deteriorating, malfunction, or improper operation of control system.		
F-2b(4)(a)(2)	Impoundment Contents	270.14(b)(5); 264.226(b)(2)	Inspect for sudden drop in level of impoundment contents.		
F-2b(4)(a)(3)	Dikes and Containment Devices	270.14(b)(5); 264.226(b)(3)	Inspect for severe erosion in containment devices.		
F-2b(4)(b)	Structural Integrity	270.14(b)(5); 264.226(c)	Specify procedure for assessing integrity of surface impoundments.		
F-2b(4)(c)	Leak Detection System	270.14(b)(5); 270.17(c); 264.226(d)	Describe how double liner system and leak detection system will be inspected.		
F-2b(5)(a)	Incinerator and Associated Equipment	270.14(b)(5); 264.347(b)	Describe procedures for daily visual inspection of incinerator and associated equipment.		
F-2b(5)(b)	Incinerator Waste Feed Cutoff System and Alarms	270.14(b)(5); 264.347(c)	Describe procedure and frequency of testing emergency waste feed cutoff system.		
F-2b(6)	Landfill Inspection	270.14(b)(5); 264.303(b)	For operating landfill, describe how it will be inspected weekly and after storms.		
F-2b(6)(a)	Runon and Runoff Control System	270.14(b)(5); 264.303(b)(1)	Deterioration, malfunction, or improper operation of runon and runoff control system.		
F-2b(6)(b)	Wind Dispersal Control System	270.14(b)(5); 264.303(b)(2)	Proper functioning of wind dispersal control systems, where present.		
F-2b(6)(c)	Leachate Collection and Removal	270.14(b)(5);	In properly functioning double liner system,		

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	System	264.303(b)(3), (c)	is there a presence of leachate? Leak detection required under 264.301(c) or 264.301(d) must record amount of leakage from each system weekly.		
F-2b(7)	Land Treatment Facility Inspection	270.14(b)(5); 264.273(g)	Describe how land treatment facility will be inspected weekly and after storms.		
F-2b(7)(a)	Runon and Runoff Control System	270.14(b)(5); 264.273(g)(1)			
F-2b(7)(b)	Wind Dispersal Control System	270.14(b)(5); 264.273(g)(2)			
F-2b(8)	Miscellaneous Unit Inspections	270.14(b)(5); 264.602	Provide inspection program that ensures compliance with standards in 264.601 and 270.23.		
F-2b(9)	Boilers and Industrial Furnaces (BIF) Inspection	270.14(b)(5); 264.15; 266.102(a)(2)(ii),(e)(8); 266.111(e)(3)	Demonstrate that BIF will be visually inspected daily, automatic waste feed cutoff inspected at least weekly, and direct transfer area at least once an hour when waste is being transferred.		
F-2b(10)	Containment Building Inspection	270.14(b)(5); 264.1101(c)(3), (4)	Demonstrate owner/operator will inspect and document at least weekly, monitoring equipment, leak detection equipment, containment building, and surrounding areas for waste releases.		
F-2b(11)	Drip Pad Inspection	270.14(b)(5); 264.574	Demonstrate that the drip pad owner/operator will inspect and document at least weekly and after storms, the leak detection and collection equipment, the drip pad surface, and the runon and runoff		

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		control systems for evidence of deterioration, malfunction, improper operation, or leakage of hazardous waste.		
F-3	Waiver or Documentation of Preparedness and Prevention Requirements	270.14(b)(6) 264.32(a) - (d)	Facility must submit justification for any waiver to requirements of this section.	
F-3(a)	Equipment Requirements	270.14(b); 264.32		
F-3(a)(1)	Internal Communication	270.14(b); 264.32(a)	Describe internal communication or alarm system used to provide immediate emergency instruction to personnel.	
F-3(a)(2)	External Communication	270.14(b); 264.32(b)	Describe device for summoning emergency assistance from local police, fire, or state/local emergency response.	
F-3(a)(3)	Emergency Equipment	270.14(b); 264.32(c)	Demonstrate that portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment are available.	
F-3(a)(4)	Water and Fire Control	270.14(b); 264.32(d)	Demonstrate facility has adequate fire control systems, water volume and pressure, foaming equipment, automatic sprinklers, etc.	
F-3(a)(5)	Testing and Maintenance of Equipment	270.14(b); 264.33	Demonstrate communication, alarm, fire control equipment, spill control equipment, and decontamination equipment are tested and maintained.	
F-3(a)(6)	Access to Communication or	270.14(b);	When waste is being hauled, all personnel	

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	Alarm System	264.34	must have access to internal alarm or communication device.		
F-3(b)	Aisle Space Requirement	270.14(b); 264.35	Aisle space is required for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in case of emergency.		
F-3(c)	Documentation of Arrangements with:	270.14(b); 264.37	Owner/operator must make arrangements, as appropriate, with type of waste and hazard potential, for the potential need for services.		
F-3(c)(1)	Police/Fire Department	270.14(b); 264.37(a)(1)	Arrange to familiarize local fire department and police with facility.		
F-3(c)(2)	Emergency Response Teams	270.14(b); 264.37(a)(2), (a)(3)			
F-3(c)(3)	Local Hospitals	270.14(b); 264.37(a)(4)	Arrange to familiarize local hospital with properties of hazardous waste and possible types of injury or illness to expect.		
F-3(c)(4)	Document Agreement Refusal	270.14(b); 264.37(b)	Document refusal to enter into a coordination agreement.		
F-4	Prevention Procedures, Structures, and Equipment	270.14			
F-4(a)	Unloading Procedures	270.14(b)(8)(i)	Describe procedure used to prevent hazards in unloading operations. Identify possible loading and unloading hazards, and document steps taken to minimize or		

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			eliminate possibility of these hazards.		
F-4(b)	Runoff	270.14(b)(8)(ii)	Describe procedure used to prevent runoff from hazardous waste handling areas.		
F-4(c)	Water Supplies	270.14(b)(8)(iii)	Describe procedure, structures, equipment used to prevent contamination of water supply.		
F-4(d)	Equipment and Power Failure	270.14(b)(8)(iv)	Describe procedure used to mitigate the effects of equipment failure and power outages.		
F-4(e)	Personnel Protection Procedures	270.14(b)(8)(v)	Describe procedure, structures, equipment used to prevent contamination of personnel to hazardous waste.		
F-4(f)	Procedures to Minimize Releases to the Atmosphere	270.14(b)(8)(vi)	Describe procedure, structures, equipment used to prevent hazardous waste releases to the atmosphere.		
F-5	Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste	270.14(b)(9)			
F-5a	Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes	270.14(b)(9); 264.17(a),(b)	Waste must be protected from sources of ignition or reaction. Describe precautions taken by facility to prevent actual ignition, including sources of spontaneous ignition and radiant heat. Owner/operator must designate safe areas for smoking and open flames. Post signs where hazard exists.		
F-5b	General Precautions for Handling Ignitable or Reactive Waste and	270.14(b)(9); 264.17(a)	Describe precautions taken by facility to prevent reactions that generate heat,		

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	Mixing of Incompatible Waste		produce flammable byproducts, cause risk of fire or explosion, threaten structural integrity, or pose threat to human life or the environment.		
F-5b(1)	Documentation of Adequacy of Procedures	270.14(b); 264.17(c)	Published literature, trial test, waste analyses, or similar processes may be used.		
F-5c	Management of Ignitable or Reactive Wastes in Containers	270.15(c); 264.176	Demonstrate that ignitable containers are at least 15 meters from facility property line.		
F-5d	Management of Incompatible Wastes in Containers	270.15(d); 264.177	Describe procedures that ensure incompatible wastes and materials are not placed in same container.		
F-5e	Management of Ignitable or Reactive Wastes in Tank Systems	270.16(j); 264.198	Describe operation procedures and how facility treats waste so it is no longer ignitable or how facility stores ignitable or reactive waste.		
F-5f	Management of Incompatible Wastes in Tank Systems	270.16(j); 264.199	Demonstrate that incompatible waste and materials are not stored in same tank.		
F-5g	Management of Ignitable or Reactive Wastes Placed in Waste Piles	270.18(g); 264.256	If waste is reactive or ignitable, describe how handling process will render waste pile nonreactive and/or nonignitable.		
F-5h	Management of Incompatible Wastes Placed in Waste Piles	270.18(h); 264.257	Document how hazardous waste piles of incompatible materials are separated to render them nonreactive.		
F-5i	Management of Ignitable or	270.17(h);	If waste is reactive or ignitable, describe		

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	Reactive Wastes in Surface Impoundments	264.229	how handling process will render surface impoundments nonreactive and/or nonignitable.	
F-5j	Management of Incompatible Wastes in Surface Impoundments	270.17(h); 264.230	Document how hazardous surface impoundments of incompatible materials are separated to render them nonreactive.	
F-5k	Management of Ignitable or Reactive Wastes Placed in Landfills	270.21(f); 264.312	If waste is reactive or ignitable, describe how handling process will prevent reaction or ignition to landfills.	
F-5l	Management of Incompatible Wastes Placed in Landfills	270.21(g); 264.313	Document how hazardous landfills of incompatible materials are separated to render them nonreactive.	
F-5m	Management of Ignitable or Reactive Wastes Placed in Land Treatment Units	270.20(g); 264.281	If waste is reactive or ignitable, describe how handling process will render land treatment units nonreactive and/or nonignitable.	
F-5n	Management of Incompatible Wastes Placed in Land Treatment Units	270.20(h); 264.282	Document how land treatment unit piles of incompatible materials are separated to render them nonreactive.	
F-5o	Management of Incompatible Wastes Placed in Containment Buildings	270.14(a); 264.1101(a)(3)	Subsections include design, primary and secondary containment, barriers to prevent migration, leak detection, and facility logs.	

Notes:

^a Considerations in addition to the requirements presented in the regulations.^b For each requirement, this column must indicate one of the following: NA for not applicable, IM for information missing, or the exact location of the information in the application.

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- ° 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.