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RCRA Permit Quality Protocol (Draft) September 1988

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APPENDIX A

CHECKLIST FOR RCRA RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMITS

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Facility Name _____
ID No.: _____

CHECKLIST FOR RCRA RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMITS*

		Provided (Y/N) or NA	Location	Comments
I	STANDARD CONDITIONS			
A	Effect of Permit [§§270.4, 270.30(g)]			
B	Permit Actions [§270.30(f)]			
C	Severability [§124.16(a)]			
D	Duties and Requirements			
D-1	Duty to comply [§270.30(a)]			
D-2	Duty to reapply [§§270.30(b), 270.10(h)]			
D-3	Permit expiration [§270.51]			
D-4	Need to halt or reduce activity not a defense [§270.30(c)]			
D-5	Duty to mitigate [§270.30(d)]			
D-6	Proper operation and maintenance [§270.30(e)]			
D-7	Duty to provide information [§§270.30(h), 264.74(a)]			
D-8	Inspection and entry [§270.30(i)]			
D-9	Monitoring and records [§§270.30(j), 270.30(l)(4)]			
D-10	Reporting planned changes [§270.30(l)(1)]			
D-11	Certification of construction or modification [§270.30(l)(2)(i)]			
D-12	Anticipated noncompliance [§270.30(l)(2)]			
D-13	Transfer of permits [§§270.30(l)(3), 270.40]			

Note: Under the provisions of 40 CFR 270.65, R,D&D permits may be issued for a period up to one year. The Administrator may waive permit requirements, except those regarding financial responsibility and those related to public participation. Thus, the reviewer may expect to see a great deal of variation in R,D&D permits. If there are hazardous waste storage facilities associated with the experimental process units, they must be permitted in accordance with the requirements of 40 CFR Parts 270 and 264. Those permit conditions may be evaluated using Sections I through IV of the Permit Quality Protocol.

Facility Name _____

ID No. _____

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		Provided (Y/N) or NA	Location	Comments
D-14	Compliance schedules [§270.30(l)(5)]			
D-15	Twenty-four hour reporting [§§270.30(l)(6), 264.56(d) and (j)]			
D-16	Manifest discrepancy reports and unmanifested waste reports [§270.30(l)(7) and (8)]			
D-17	Biennial report [§270.30(l)(9)]			
D-18	Other noncompliance [§270.30(l)(10)]			
D-19	Other information [§270.30(l)(11)]			
E	Signatory Requirements [§§270.11, 270.30(k)]			
F	Confidential Information [§270.12]			
G	Documents to be Submitted Prior to Operation [§§270.32, 270.33]			
H	Documents to be Maintained at Facility Site			
H-1	Waste analysis plan [§264.13(b)]			
H-2	Personnel training documents/records [§264.16(d)]			
H-3	Contingency plan [264.53(a)]			
H-4	Closure plan/post-closure plan [§264.112(a)]			
H-5	Closure cost estimate/post-closure cost estimate [§264.142(d)]			
H-6	Operating record [§264.73]			
H-7	Inspection schedule(s) [§264.15(b)]			
H-8	Other documents			

Facility Name _____
ID No. _____

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		Provided (Y/N) or NA	Location	Comments
II	GENERAL FACILITY CONDITIONS			
A	Design and Operation of Facility [§264.31]			
B	Required Notices [§264.12]			
C	General Waste Analysis [§264.13]			
C-1	Parameters to be analyzed for in each waste [§264.13(b)(1)]	Y	§3.3	Table
C-2	Analytical methods [§264.13(b)(2)]	Y	§3.3	Describe methodologies
C-3	Methods to sample wastes [§264.13(b)(3)]	Y	§3.3	Sampling methods
C-4	Frequency of analysis [§264.13(b)(4)]	N	§3.3	Add frequency of sampling
C-5	Wastes from off-site [§264.13(a)(4) and (b)(5)]	N/A	§3.3	No off-site waste
C-6	Waste characterization requirements for specific types of treatment and disposal [§264.13(b)(6)]	N	§3.3	Include waste characterization requirements
D	Security [§264.14]			
D-1	Description of barrier and means to control entry (or 24-hour surveillance system) [§264.14(b)]	Y	§5.1	
D-2	Description of warning signs [§264.14(c)]	Y	§5.1	
E	General Inspection Requirements* [§264.15]			
E-1	Inspection schedule [§264.15(b)]	N	§5.2	Add inspection schedule
E-2	Items to be inspected [§264.15(b)(1)]	N	§5.2	
E-3	Type of problems for which each item is inspected [§264.15(b)(3)]	N	§5.2	
E-4	Inspection frequency [§264.15(b)(4)]	N	§5.2	Add daily inspection
F	Personnel Training [§264.16]			
F-1	Program director [§264.16(a)(2)]	N	§7.0	
F-2	Training program contents [§264.16(a)(3)]	Y	§7.0	

Facility Name _____
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		Provided (Y/N) or NA	Location	Comments
F-3	Frequency of training [§264.16(b) and (c)]	N	7.6	Add Frequency w/in months/or assignment
G	General Requirements for Ignitable, Reactive, or Incompatible Waste [§264.17]			
G-1	Ignitable or reactive [§264.17(a)]			7-5a
G-2	Incompatibles [§264.17(b)]			
H	Location Standards [§§264.18, 270.14(b)(11)]			
H-1	Seismic considerations [§264.18(a)]			
H-2	Flood proofing description/drawings [§264.18(b)]			
H-3	Flood plan [§264.18(b)]			
I	Preparedness and Prevention			
I-1	Required equipment [§264.32]			
I-2	Testing and maintenance of equipment [§264.33]			
I-3	Access to communications or alarm system [§264.34]			
I-4	Required aisle space [§264.35]			
I-5	Arrangements with local authorities [§264.37]			
J	Contingency Plan			
J-1	Implementation of plan [§264.51]			
J-2	Copies of plan [§264.53]			
J-3	Amendments to plan [§264.54]			
J-4	Contents of contingency plan [§264.52]			
J-4a	response procedures [§264.52(a)]			
J-4b	coordination agreements [§264.52(b)]			
J-4c	emergency coordinators [§§264.52(d), 264.55]			
J-4d	emergency equipment [§264.52(e)]			

Facility Name _____
ID No. _____

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		Provided (Y/N) or NA	Location	Comments
J-4e	evacuation plan [§264.52(f)]			
J-5	Emergency procedures [§264.56]			
J-5a	notification [§264.56(a)]			
J-5b	identification of hazardous materials [§264.56(b)]			
J-5c	assessment of hazards [§264.56(c)]			
J-5d	notification in event of threat to human health or the environment [§264.56(d)]			
J-5e	prevention of recurrence or spread of fires, explosions, or releases [§264.56(e)]			
J-5f	monitoring following cessation of operations [§264.56(f)]			
J-5g	storage and treatment of released materials [§264.56(g)]			
J-5h	incompatible wastes [§264.56(h)(1)]			
J-5i	post-emergency equipment maintenance [§264.56(h)(2)]			
J-5j	notification and reports [§264.56(i) and (j)]			
J-6	Unit-specific control procedures			
K	Manifest System [§§264.71, 264.72]			
L	Recordkeeping and Reporting			
L-1	Operating record [§264.73]			
L-2	Availability of records [§264.74]			
L-3	Biennial report [§264.75]			
L-4	Unmanifested waste report [§264.76]			

Facility Name _____
ID No. _____

CHECKLIST FOR RCRA RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMITS*

		Provided (Y/N) or NA	Location	Comments
M	General Closure Requirements*			
M-1	Requirement for written plan [§264.112(a)]			
M-2	Content of closure plan [§264.112(b)]			
M-2a	description of final closure [§264.112(b)(2)]			
M-2b	maximum waste inventory [§264.112(b)(3)]			
M-2c	decontamination or removal procedures [§§264.112(b)(4), 264.114]			
M-2d	other activities required to meet closure standard [§264.112(b)(5)]			
M-2e	closure schedule [§§264.112(b)(6), 264.113]			
M-2f	estimated year of final closure (where applicable) [§264.112(b)(7)			
M-3	Amendment of plan [§264.112(c)]			
M-4	Notification of partial closure and final closure [§264.112(d)]			
M-5	Removal of wastes and decontamination or dismantling of equipment [§264.112(e)]			
M-6	Certification of closure [§264.115]			
N	Cost Estimate for Facility Closure [§§264.142]			
O	Financial Assurance for Facility Closure [§§264.143, 264.145]			
P	Liability Requirements [§264.147]			
Q	Incapacity of Owners or Operators, Guarantors, or Financial Institutions [§264.148]			

*The general closure requirements applicable to all types of hazardous waste management units are listed under Item M. The specific technical requirements applicable to each type of unit are listed under those units.

Facility Name _____
ID No. _____

CHECKLIST FOR RCRA RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMITS*

		Provided (Y/N), or NA	Location	Comments
III	DESIGN AND OPERATING CONDITIONS			
A	Process Description			
A-1	Unit processes (including treatment chemicals)			
A-2	Process flow			
B	Design and Construction of Process Units			
B-1	Design plans and specifications			
B-1a	process units			
B-1b	pollution control equipment			
B-2	Materials of construction			
B-3	Construction procedures and specifications (for new units)			
B-4	Construction monitoring and inspection			
C	Operations			
C-1	Wastes			
C-1a	allowable types and quantities of wastes			
C-1b	waste feed rates			
C-1c	sources of wastes (where applicable)			
C-1d	specific prohibitions or exclusions			
C-2	Operating limits			
C-2a	operating limits (e.g., flow rates, temperature, pressure)			
C-2b	chemical feed rates			
C-2c	retention times, mixing rates, etc.			
C-3	Operating procedures			
C-4	Operating controls			

Facility Name _____
ID No. _____

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		Provided (Y/N) or NA	Location	Comments
C-4a	monitoring and instrumentation			
C-4b	process controls (valves, etc.)			
C-5	Procedures for treating and disposing of by-products or off-spec product			
C-6	Process monitoring and reporting (to evaluate efficacy of the process)			
C-6a	parameters to be monitored			
C-6b	monitoring and sampling methods and instrumentation			
C-6c	analytical methods (where appropriate)			
C-6d	required form of data			
C-6e	statistical procedures (where appropriate)			
C-6f	recordkeeping requirements (related to process efficiency)			
C-6g	reporting requirements (related to process efficiency)			