



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Standardized Permit Application Instructions

Only the following facilities are eligible for a RCRA standardized permit:

- A facility that generates hazardous waste and then stores or non-thermally treats the hazardous waste on-site in containers, tanks, or containment buildings; or
- A facility that receives hazardous waste generated off-site by a generator under the same ownership as the receiving facility, and the facility stores or non-thermally treats the hazardous waste in containers, tanks, or containment buildings.

These instructions, together with the RCRA Standardized permit application checklist, are designed to assist applicants in the preparation of a RCRA Standardized permit application (also referred to as a "Notice of Intent"). All permit applications should follow the format of these instructions as specified below to facilitate a timely review of all documents.

Unlike an application for an individual RCRA permit, an application for a Standardized RCRA permit is broken into two parts; information that must be submitted, and information that is required to be kept and maintained at the facility. The information required to be kept on-site, but not submitted with an application for a Standardized RCRA permit, is specified in [35 IAC 703.352](#). This information must be kept together and in the same general format as any other RCRA permit application. The format for a RCRA permit application is specified in the [RCRA Hazardous Waste Permit Application Decision Guide](#).

Pursuant to [35 Ill. Adm. Code 702.108](#), the Agency has no authority to issue any permit that is inconsistent with Board regulations. If an applicant seeks a permit which would authorize actions inconsistent with Board regulations, including delayed compliance dates, the applicant should file a variance petition pursuant to Title IX of the Environmental Protection Act and [35 Ill. Adm. Code 104](#).

All permit applications, and subsequent information must be submitted to the following address:

Illinois EPA
Permit Section, Bureau of Land
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL
62794-19276

Questions may be directed to the Bureau of Land Permit Section at 217-524-3300.

The following information must be provided with all applications for a RCRA Standardized Permit Application (35 IAC [702.123](#), [703.351](#)):

RCRA Standardized Permit Application Instructions

A Forms, Certifications and Confidentiality

A.1 Forms and General Information

A.1.1 Bureau of Land Permit Application Form LPC- PA23

The RCRA standardized permit application (and all supplemental information) must include a completed PA23 form.

A.1.2 RCRA Part A Application: [702.121](#), [702.123](#), [702.126](#), [703.181](#)

The Part A application must be complete and consistent with the rest of the RCRA standardized permit application. [Section 703.181](#) specifies the contents of a Part A application. Signatures must be provided for both the owner and operator. This includes landowners of a site that are different from the company operating the hazardous waste facility. The Part A portion of the RCRA Standardized permit application must include the following information:

A.1.3 General Information: [702.123](#), [703.181](#)

The following general information must be provided for all standardized RCRA permit applications:

- A.1.3.1 The name, mailing address, and location of the facility for which the standardized RCRA permit application is submitted;
- A.1.3.2 The name, address, and telephone number of the owner of the facility;
- A.1.3.2 The name, address, and telephone number of the owner of the facility;
- A.1.3.3 The operator's name, address, telephone number, ownership status, and status as Federal, State, private, public, or other entity;
- A.1.3.4 The latitude and longitude of the facility;
- A.1.3.5 A brief description of the nature of the business;
- A.1.3.6 The activities conducted by the applicant that require it to obtain a permit under RCRA;
- A.1.3.7 Up to four SIC codes that best reflect the principal products or services provided by the facility;
- A.1.3.8 Specifications of the hazardous wastes listed or designated under [35 Ill. Adm. Code 721](#) to be treated or stored at the facility, an estimate of the quantity of such wastes to be treated or stored annually, and a general description of the processes to be used for managing such wastes;
- A.1.3.9 A description of the processes to be used for treating or storing hazardous waste and the design capacity of the management units,
- A.1.3.10 For hazardous debris, a description of the debris categories and containment categories to be treated or stored at the facility;
- A.1.3.11 An indication of whether the facility is new or existing and whether it is a first or revised application;
- A.1.3.12 A scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas;
- A.1.3.13 For existing facilities, photographs of the facility clearly delineating all existing structures; existing treatment, storage, and disposal areas; and sites of future treatment, storage, and disposal areas,
- A.1.3.14 A topographic map (or other map if a topographic map is unavailable) extending 1609 meters (one mile) beyond the property boundaries of the source, depicting the facility and each of its intake and discharge structures; each of its hazardous waste treatment, storage, or disposal facilities; each well where fluids from the facility are injected underground; and those wells, springs, other surface water bodies, and drinking water wells listed in public records or which are otherwise known to the applicant within 402 meters (one-quarter mile) of the facility property boundary.

RCRA Standardized Permit Application Instructions

A.1.3.15 A listing of all permits or construction approvals received or applied for under any of the following programs:

- The hazardous waste management program under RCRA, this Part, and [35 Ill. Adm. Code 703](#);
- The UIC program under SDWA, this Part, and [35 Ill. Adm. Code 704](#);
- The National Pollutant Discharge Elimination System (NPDES) program under the federal CWA (33 USC 1251 et seq.) and [35 Ill. Adm. Code 309](#);
- The Prevention of Significant Deterioration (PSD) program under the federal Clean Air Act (42 USC 7401 et seq.);
- The nonattainment program under the federal Clean Air Act;
- The National Emission Standards for Hazardous Pollutants (NESHAPs) preconstruction approval under the federal Clean Air Act;
- Any ocean dumping permits under the federal Marine Protection Research and Sanctuaries Act (33 UCS 1401 et seq.);
- Any dredge or fill permits under Section 404 of CWA (33 USC 1344); and
- Any permits issued by the State of Illinois;
- Any other relevant environmental permits.

A.2 Certifications: [703.182](#), [702.126](#)

A.2.1 Facility Audit Certification Form [35 IAC 703.351\(b\)\(6\)](#)

Provide a completed Audit Certification Form and audit report based on the audit of your facility's compliance with the requirements of [35 IAC Part 727](#).

A.2.2 Documentation of Off-Site Ownership [35 IAC 703.351\(b\)\(10\)](#)

A facility that wishes to manage waste generated from off-site must provide documentation showing that the waste generator and the facility accepting waste from off-site facility are under the same ownership.

A.2.3 39i Certification: Section 39 Environmental Protection Act

Applications must be accompanied by a completed and signed 39i certification evaluation, as required under Section 39(i) of the Act. Both the Agency form and applicant's signature must be originals, not copies.

A.2.4 Certification of Authenticity

Applications must be accompanied by a completed and signed Certification of Authenticity Form.

A.3 Public Disclosure Exemption Claims and Trade Secret Claims: Section 7 of the Act; [2 Ill. Adm. Code Part 1828](#); [35 Ill. Adm. Code Part 130](#)

Any documents submitted that are not properly marked and justified will not be regarded as exempt and will be released to the public upon request.

A.3.1 No Information Claimed Exempt from Public Disclosure

If no information in the application is claimed exempt from public disclosure, the applicant should clearly state this in the cover letter. This will release any disclaimers on drawings, plans etc. that are included in the application.

A.3.2 Trade Secrets Claims

This claim should be asserted if any portion of the application is regarded as trade secret pursuant to [35 Ill. Adm. Code 130](#).

- Provide claim and justification letter with submittal.
- Stamp each page in red ink "TRADE SECRET" that is to be exempt.
- Provide sanitized version for public review.

RCRA Standardized Permit Application Instructions

A.3.3 Exempt or Exempt In-Part Data Claims: [2 Ill. Adm. Code 1828.401](#)

This claim should be asserted if any portion of the application is regarded as exempt or exempt in part pursuant to [2 Ill. Adm. Code 1828.401](#).

- Provide claim and justification letter with submittal.
- Marking requirements as specified.
- Provide sanitized version for public review.

A.3.4 Justification Letter: [2 Ill. Adm. Code 1828.401](#)

All submittals must be accompanied by a claim and statement of justification if an exemption is required.

A.3.5 Privileged Information: [2 Ill. Adm. Code 1828.401](#)

This claim should be asserted if any portion of the application is regarded as exempt or exempt in part pursuant to [2 Ill. Adm. Code 1828.401](#).

- Provide claim and justification letter with submittal.
- Marking requirements as specified.
- Provide sanitized version for public review.

B Public Participation

B.1 Facility Mailing List & Information Repositories: Environmental Protection Act, Section 39(d), [703.193](#), [703.248](#), [705.163](#)

B.1.1 Facility Mailing List

Submit a dated copy of the facility mailing list as an attachment to the permit application. Both a printed copy and an electronic copy in MS Word format need to be provided. The list must be updated and resubmitted to the Illinois EPA as needed to include individuals who have interacted with the facility such as those attending the pre-application meeting, respondents to mailings, and when a permit modification is requested.

The Agency will review and approve all updates prior to using the mailing list. Mailing lists originally developed by the Illinois EPA are available from the Agency's RCRA public participation coordinator.

B.1.2 Identification of Repositories

All documents submitted to the Illinois EPA in furtherance of the permit application, with the exception of trade secrets, must be made available to the public at the office of the local government and in another location in the host community (or nearest community to the facility) no later than the date the permit application was provided to the Illinois EPA.

Provide the name, address, contact person, phone number, and business hours for each repository. List the information and indicate the dates it was added to each repository.

Note: The community repository may not be located at the subject facility and must be available to the community for review and copying of application documents after regular office hours. Public libraries are recommended repository locations.

B.1.3 Contents of Repository, Public Notice of Repository Availability

The repository must contain all of the documents in the permit application. The applicant is required to maintain and update the repository throughout the application process. Verify the contents and update the application information as new information is developed and submitted to the Agency. Document each new repository submission by referencing it in the letter submitting that same information to the Agency.

RCRA Standardized Permit Application Instructions

The applicant's notice of the repositories' availability for public review must include all of the following information:

- Identification and address or map of the applicant facility and the hazardous waste management operations or proposed operations that this permit application addresses.
- A statement that hazardous waste permit application materials have been prepared and are available for community members to review and copy at the repository location.
- The location and business hours of the repository.
- A statement that the applicant will update the repository materials periodically during the Illinois EPA's review of the permit application.
- The name, address and telephone number of the applicant's contact person to address questions regarding the application or to be added to the facility's mailing list for future permit activities.
- A statement "For general information on the hazardous waste management permit program in Illinois, please contact" then provide the address of the RCRA Public Involvement Coordinator, Illinois EPA.

Note: The applicant is required to maintain and update the repository throughout the application process as necessary.

B.1.4 Documentation of Public Notices of Repositories

Provide documentation that the public notices of the repositories were completed as required by the regulations. These notices must be made no later than the date the permit application is submitted to the Illinois EPA. Specifically:

- Provide a copy of the letter sent to individuals on the approved facility mailing list. Indicate the date the letter was sent, and the revision date of the mailing list used for the mailings.
- Provide either the publisher's certification stating that it published the notice as a display ad once per week for three consecutive weeks, or provide newspaper tear sheets containing the display ad for each date the ad ran. [This information may be submitted separate from the original permit application if it is not evaluated on the date the application is submitted to the Illinois EPA.]

B.2 Pre-Application Public Notice and Meeting: [703.191](#)

Applicability: The requirements of section B.2 are applicable to:

- An initial permit application,
- An application for a significant change to the permit as defined at [35 IAC 705.304\(a\)](#),
- An application for renewal of a standardized RCRA permit where the renewal is proposing a significant change in facility operations, or
- The applicant wishes to change their individual RCRA permit to an individual RCRA permit and a standardized RCRA permit (e.g. one or more RCRA units are moved from the individual permit to a standardized RCRA permit).

In general, the requirements of Section B.2 would not apply to a facility renewing its standardized RCRA permit or changing its individual RCRA permit to a standardized RCRA permit - provided there are no significant changes proposed.

B.2.1 Pre-Application Public Meeting:

Provide a summary of the pre-application public meeting. At a minimum, this summary must include the list of attendees, their addresses, and copies of any written comments, questions or materials submitted at the meeting. The Agency expects that the addresses of any repositories established at this stage as well as meeting topics of discussion be included as part of the meeting summary.

RCRA Standardized Permit Application Instructions

B.2.2 Public Notice of Pre-Application Meeting

Provide documentation that the public notice of the pre application meeting occurred at least 30 days prior to the meeting and was done in each of the following forms as specified at [703.191\(d\)](#):

Note: This notice may be combined with the applicant's notice of repository availability (See Section B.1.4 above)

- A newspaper display advertisement in a newspaper of general circulation in the county that hosts the proposed location of the facility.
- A notice posted on a clearly marked sign at or near the facility. The sign must be large enough to be readable from the nearest point where the public would pass by.
- A broadcast media announcement at least once on at least one local radio or television station.
- A copy of the newspaper notice to the Illinois EPA and all other state and local officials as set forth at [705.163\(a\)\(5\)](#).

The Agency recommends sending this notice to those on the complete facility mailing list, although this is not a requirement.

B.2.3 Content of Pre-Application Meeting Notice: All notices required under this section must include:

- The date, time, and location of the meeting;
- A brief description of the purpose of the meeting;
- A brief description of the facility and proposed operations, including the address or a map of the facility location;
- A statement encouraging people to contact the facility at least 72 hours before the meeting if they need special access to participate in the meeting;
- The name, address, and telephone number of a contact person for the applicant; and
- The addresses of any repositories (if established at this stage), although this is not a requirement.

C Facility Location Standards

[703.183\(k\)](#), [703.184](#), [727.110\(i\)](#)

C.1 Floodplain Standard:

Document whether or not the facility is located within a 100 year floodplain. This information must indicate the source of data for this determination and include a copy of the relevant flood map produced by Federal Emergency Management Agency (FEMA), National Flood Insurance Program (NFIP), or the calculations and maps used where NFIP maps are not available. [Note: [703.184\(c\)](#) provides sources of NFIP maps] Maps of the facility must also identify the 100 year flood level and any other special flooding factors (e.g. wave action) that must be considered in designing, constructing, operating, or maintaining the facility to withstand washout from a 100 year flood.

C.1.1 Facilities in the 100-year floodplain: Facilities located within the 100 year floodplain must include the following information:

- C.1.1.1 Engineering Analysis: Provide an engineering analysis that identifies and evaluates the various hydrodynamic and hydrostatic forces expected to result at the site as a consequence of a 100 year flood;
- C.1.1.2 Structural or Engineering Study: Provide a structural or other engineering study that shows the design of operational units (e.g. tanks, incinerators) and flood protection devices (e.g. floodwalls, dikes) at the facility and how these will prevent washout;
- C.1.1.3 Procedures to Remove Waste: In lieu of C.1.1.1 and C.1.1.2, provide a detailed description of the procedures to be followed to remove hazardous waste to safety before the facility is flooded. This information must include
 - Timing of such movement relative to flood levels, including estimated time to move the waste, to show that such movement can be completed before floodwaters reach the facility.
 - A description of the location(s) to which the waste will be moved, and a demonstration that those facilities will be eligible to receive hazardous waste in accordance with [702](#), [703](#), [724](#) and [725](#);

RCRA Standardized Permit Application Instructions

- A description of the location(s) to which the waste will be moved, and a demonstration that those facilities will be eligible to receive hazardous waste in accordance with [702](#), [703](#), [724](#) and [725](#);
- The planned procedures, equipment, and personnel to be used, and the means to ensure that such resources will be available in time for such use;
- The potential for accidental discharge of the waste during movement.
- The planned procedures, equipment, and personnel to be used, and the means to ensure that such resources will be available in time for such use;
- The potential for accidental discharge of the waste during movement.

C.1.2 Existing facilities not in compliance with [724.118\(b\)](#): Provide a plan showing how the facility will be brought in compliance and a schedule for compliance with [724.118\(b\)](#). Such facilities must also file a concurrent variance petition with the Board. [[703.184\(e\)](#)]

D SOLID WASTE MANAGEMENT UNIT (SWMU) INFORMATION CORRECTIVE ACTION ([35 III. Adm. Code 724.201](#))

D.1 Identification of Solid Waste Management Units ([703.187\(a\)](#))

Identify the solid waste management units (SWMUs) present at the facility. A SWMU includes any unit where solid waste has been managed in the past and which is not a hazardous waste management unit. Units that are SWMUs include, but are not limited to, the following:

- Landfills
- Surface impoundments
- Waste piles
- Land treatment units
- Injection wells
- Incinerators
- Tanks (including wastewater treatment units, elementary neutralization units, and tanks used in reuse/recovery operations)
- Container storage areas, transfer stations
- Waste recycling operations

D.2 Characterization of the SWMUs ([703.187\(a\)](#))

For each solid waste management unit identified above, submit the following information:

- Type of unit
- Location on the topographic map required by Item B-2 of the decision guide/checklist
- Engineering drawings and construction details as available
- General dimensions
- Dates when the unit was in operation
- Description (including physical and chemical characterization) of the materials or wastes placed in each unit
- Quantity or volume of waste managed in the unit, if known
- A description of: (1) the soil types present at the unit; and (2) the geology of the area where the unit is located.
- An indication of whether the wastes managed in the unit have been removed or still remain in it.

RCRA Standardized Permit Application Instructions

D.3 Characterization of Releases from SWMUs (703.187(b))

Provide all available information on whether or not any releases have occurred from each of the solid waste management units identified above. Reasonable efforts to identify releases must be made, even if releases have not been verified. (A release may include: spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment. Releases otherwise permitted or authorized under law or discharges into the injection zone of a UIC permitted class 1 injection well are not required to be identified). If a determination is made that there has not been any releases from a given SWMU, then a description of the efforts and information used to reach this conclusion must be provided.

The information to be provided regarding the releases, as available, includes:

- Date of the release
- Type of waste or constituent released
- Physical and chemical characteristics of the released material
- Quantity or volume released
- Nature of the release (such as spill, overflow, ruptured pipe or tank, etc.).
- Groundwater monitoring and other analytical data available to describe the nature and extent of the release.
- Physical evidence of distressed vegetation or soil contamination
- Historical evidence of releases, such as tanker truck accidents
- Any state, local or federal enforcement actions which may address releases
- Any public citizen complaints about the facility which could indicate a release
- Any information showing the migration of the release.
- A detailed description of any remedial activities taken in response to the release.

D.4 Information Required for Renewal Applications (703.187(c))

Facilities seeking a renewed RCRA permit have likely completed a substantial amount of corrective action efforts to date. A summary of this information must be provided in the renewal application; this information will form the foundation for determining future corrective action efforts to ensure the requirements of 35 Ill. Adm. Code 724.201 are met.

D.4.1 Required Information if USEPA Oversaw Initial Corrective Action Program

Facilities applying for a renewed RCRA permit which conducted corrective action efforts in accordance with requirements of the USEPA portion of the original RCRA permit issued to the facility must provide the following information regarding these efforts:

- D.4.1.1 A detailed chronology of all correspondence between USEPA and the facility regarding corrective action efforts, starting from the issuance of the original RCRA permit;
- D.4.1.2 Copies of all letters received from USEPA regarding corrective action efforts, starting with the issuance of the original RCRA permit;
- D.4.1.3 Copies of all letters and documents sent to the USEPA regarding corrective action efforts conducted in accordance with the original RCRA permit;
- D.4.1.4 A detailed discussion of each of the solid waste management units identified and addressed in accordance with the provision of the facility's original RCRA permit, including: (1) detailed description of each SWMU of concern (such as construction/operating details, types of waste managed in the unit and drawing showing the layout of the units geology/hydrology of the area where the unit is located, etc.); (2) a scaled drawing showing the location of the unit within the facility; (3) a summary of the investigation/remediation efforts completed to date; and (4) discussion of any investigation/remediation efforts which must still be carried out to complete corrective action responsibilities for the unit.

RCRA Standardized Permit Application Instructions

- D.4.1.5 The information in the appropriate portions of Section E (Groundwater Monitoring) regarding any on-going groundwater monitoring/remediation program being carried out at the facility.

Compiling all the information regarding corrective action efforts completed to date, as required above, is necessary to create an administrative record adequate to support the requirements to be placed in the facility's renewed RCRA permit regarding corrective action. In addition, this information will form the foundation for completing the facility's RCRA corrective action program.

D.4.2 Required Information if IEPA Oversaw Initial Corrective Action Program

Facilities which carried out corrective action under the requirements of the Illinois EPA portion of the original permit must provide the following information regarding corrective action efforts completed at the facility:

- D.4.2.1 A detailed chronology of all corrective action efforts completed to date, starting with the issuance of the original RCRA permit;
- D.4.2.2 A discussion of all corrective action related correspondence between the facility and Illinois EPA, including copies of all Illinois EPA letters regarding corrective action efforts at the facility (starting with the original permit);
- D.4.2.3 A detailed discussion of each of the solid waste management units identified and addressed in accordance with the facility's original RCRA permit. This must include: (1) detailed description of each SWMU of concern (such as construction/operating details, types of waste managed in the unit and drawing showing the layout of the units geology/hydrology of the area where the unit is located, etc.); (2) a scaled drawing showing the location of the unit within the facility; (3) a summary of the investigation/remediation efforts completed to date; and (4) a discussion of any investigation/remediation efforts which must still be carried out to complete corrective action responsibilities for the unit.
- D.4.2.4 The information in the appropriate portions of Section E (Groundwater Monitoring) regarding any on-going groundwater monitoring/remediation program being carried out at the facility.

Due to the fact that copies of all corrective action correspondence for these projects should be in Illinois EPA's files, it will not be necessary to include copies of submittals made by the facility in the application. However, the application must contain copies, in chronological order, of the cover letter of all submittals made to date by the facility and all Illinois EPA letters sent to the facility regarding corrective action (starting with the original permit). This will allow the permit application to provide an adequate administrative record of the corrective action efforts completed at the facility.

E CLOSURE REQUIREMENTS

E.1 Closure Plan: [703.351\(b\)\(8\)](#), [727.210\(c\)](#)

Provide a written closure plan that describes how each hazardous waste management unit (HWMU) will be closed in compliance with all of the applicable requirements.

E.1.1 Closure Performance Standard: [727.210](#)

- E.1.1.1 General Requirements: Describe how the HWMUs will be closed in a manner that minimizes the need for post closure maintenance and controls, minimizes or eliminates, to the extent necessary to protect to human health and the environment, post closure escape of hazardous waste, hazardous constituents, leachate, contaminated run off or hazardous decomposition products to the ground or surface waters or to the atmosphere.

- E.1.1.2 Specific Requirements: Describe how closure of the facility complies with the closure requirements of Part 727 including, but not limited to, the requirements of [Sections 727.210\(b\) through \(f\)](#), [724.270\(g\)](#), [727.290\(l\)](#), and [727.900 \(i\)](#).

E.1.2 Maximum Operations and Waste Inventory: [727.210\(c\)](#)

Provide the dimensions and capacity of each HWMU that will exist during the active life of the facility. Provide an estimate of the maximum inventory of wastes ever in storage and in treatment at any time during the active life of the facility.

RCRA Standardized Permit Application Instructions

E.1.3 Partial Closure

Identify if partial closure is anticipated during the active life of the facility.

- Describe how and when the facility will be partially closed.
- Identify the maximum extent of facility operations after partial closure.

E.1.4 Closure Methods: [727.210\(c\)](#)

Provide a detailed description of the methods to be used during partial or final closure of the facility. Describe the methods for removing, transporting, treating, storing or disposing of all hazardous wastes, and identification of the type (s) of off site hazardous waste management units to be used, if applicable.

E.1.5 Removal and Decontamination Procedures: [727.210\(c\)](#)

Provide a detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structure, and soils during partial and final closure. This description must include, but not be limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of decontamination required to satisfy the closure performance standard.

E.1.6 Other Activities: [727.210\(c\)](#)

Provide a detailed description of other activities necessary during the closure period to ensure that all partial closures and final closure satisfy the closure performance standards.

E.1.7 Unit Specific Closure Activities: [724.212\(a\)\(2\)](#)

Describe how the closure activities described above in Sections E.1.4, E.1.5, and E.1.6 address the unit specific closure activities required below. (Note the specific activities can/should be included as part of Sections E.1.4, E.1.5, and E.1.6 above.)

E.1.7.1 Closure of Container Storage Areas [727.270\(g\)](#): Describe how all hazardous waste and hazardous waste residue will be removed from the containment system, and how remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed.

E.1.7.2 Closure of Tank Systems ([727.290\(l\)](#)): Show that at closure, the owner or operator shall remove or decontaminate all hazardous waste and hazardous waste residues, contaminated containment system components (liners, etc.), contaminated soils, structures and equipment and manage them as hazardous waste unless [35 IAC 721.103\(d\)](#) applies.

E.1.7.3 Closure of Containment Buildings ([727.900\(i\)](#)): Show that at closure, the owner or operator shall remove or decontaminate all hazardous waste and hazardous waste residues, contaminated containment system components (liners, etc.), contaminated soils, structures and equipment contaminated with waste and/or leachate and manage them as hazardous waste unless [35 IAC 721.103\(d\)](#) applies.

E.1.8 Closure Schedule: [727.210\(c\)](#)

Provide a schedule for closure of each hazardous waste management unit. The schedule must include, at a minimum, the total time required to close each hazardous waste management unit and the time required for intervening closure activities which will allow tracking of the progress of partial and final closure. For example, provide estimates of the time required to remove the entire hazardous waste inventory, decontaminate structures, and remove equipment.

E.1.9 Expected Year of Final Closure: [724.212\(b\)\(7\)](#)

Facilities that use trust funds to establish financial assurance under Section [727.240\(d\)](#), and that are expected to close prior to the expiration of the permit, must provide an estimate of the expected year of final closure.

E.2 Closure Cost Estimate: [703.351\(b\)\(8\)](#), [727.240\(c\)](#)

Provide a copy of the closure cost estimate.

E.2.1 **Third Party Costs:** Cost estimates must be based on third party costs and cannot include salvage value for sale of hazardous wastes, facility structures or equipment. The facility owner or operator may not incorporate a zero cost for hazardous waste, or non-hazardous waste that may have economic value. The owner or operator may use costs for on-site disposal if it can demonstrate that on-site disposal capacity will exist at all times over the life of the facility.

RCRA Standardized Permit Application Instructions

- E.2.2 Maximum Cost Estimate:** The estimate must be calculated to cover the cost of closure when the cost would be greatest (e.g. for the maximum volume of permitted waste). Partial closure cost estimates may be provided when appropriate, but only in addition to the estimated maximum full closure cost estimate.
- E.2.3 Unit Costs:** The estimate must include unit costs for each closure activity, and be calculated to cover the cost of closure when the cost would be greatest (not including partial closure).
- E.2.4 Annual Updates:** The cost estimate must be updated annually using an inflation factor or by recalculating the maximum cost of closure in current dollars. Existing facilities should provide a copy of the most recent cost estimate that was provided to the IEPA.
- E.3 Financial Assurance Mechanism for Closure:** [703.351\(b\)\(8\)](#), [727.240\(d\)](#)
- Provide a copy of the established financial assurance mechanism for facility closure. The mechanism must be one of those described in [727.240\(d\)](#). Contact the Illinois EPA Bureau of Land Permit Section to obtain the proper forms and instructions. For a new facility, the owner or operator may gather the required documentation 60 days before the initial receipt of hazardous waste.
- E.4 State Mechanisms:** **40 CFR 264.149, 40 CFR 264.150, 35 IAC 724.251**
- If the State of Illinois assumes legal responsibility for compliance with closure, or liability requirements, or the state assures that state funds are available to cover those requirements, submit a copy of a letter from the state describing the state assumption of responsibility and including the facility EPA ID number, name, address, and amounts of liability coverage or funds for closure that are assured by the state, together with a letter requesting that the state's assumption of responsibility be considered acceptable.
- F OTHER FEDERAL LAWS:** [703.183\(t\)](#)
- Provide information, such as copies of required permits or letters from Federal Agencies, in the application that demonstrates compliance with the requirements of the Clean Air Act and Clean Water Act.

ADDITIONAL STANDARDS APPLICABLE TO FACILITIES THAT RECEIVE WASTE FROM OFF-SITE

The following requirements only apply to a facility that manages waste generated off-site.

G WASTE CHARACTERISTICS

Applicability: These requirements apply to all wastes; solids, liquids, and gases managed in a RCRA regulated unit at the facility. These requirements also apply to nonhazardous wastes if they are managed in a RCRA regulated unit.

G.1 Chemical and Physical Analyses: [703.351\(b\)\(9\)](#), [727.110\(d\)](#)

Note: if a commercial/technical grade of a chemical/product (e.g., explosives or ammunition) will be managed at the facility, in some cases, an MSDS or literature information may be used in place of an actual laboratory analysis.

G.1.1 General Chemical Information and Analyses

The permit application must include the following information for each hazardous waste stored, treated or disposed at the facility:

- A description of the waste
- The unit where it will be managed
- Its physical state (solid, liquid, gas) at standard temperature and pressure
- The basis for hazard designation
- Laboratory analysis no more than five years old, signed and dated, that details the chemical and physical analyses of a representative sample of the hazardous wastes managed at the site, (i.e., provide a typical analysis of an ignitable, corrosive, reactive and TCLP toxic waste, if managed)

RCRA Standardized Permit Application Instructions

- A table summarizing the analytical results for all of the wastes managed in the RCRA units and
- Identify if dioxin containing waste, acutely toxic wastes and wastes containing free liquids as determined by the Paint Filter Liquids Test, Method 9095, in USEPA's publication SW-846 "Test Methods for Evaluating Solid Waste" (3rd edition and most recent finalized updates) will be managed

At a minimum, these analyses must contain all the information which must be known to treat, store or dispose of the hazardous wastes properly in accordance with Subtitle G.

G.1.2 Physical Properties and Toxicity Information: [703.183\(b\)](#), [703.188](#), [724.156\(c\)](#)

As part of the Contingency Plan, the application must evaluate the off-site consequences of a release (toxic vapor cloud or fire) from the facility. To address the air modeling requirements in the evaluation, a separate table with the information listed below needs to be provided for each constituent present in the hazardous waste managed at the facility:

Compound Name
USEPA Hazardous Waste Number
CAS Number
IDLH
TLVs (TLV-TWA, TVL-STEL, TLV-C)
Boiling Point
Vapor Pressure @ 68o F (20o C)
Vapor Pressure @ 100o F
Lower Explosive Limit
Upper Explosive Limit
Molecular Weight
Specific Gravity
NFPA Designation (flammable or combustible and the subdivision classification)

G.1.3 Land Disposal Restrictions: [703](#), [728](#)

Identify all hazardous constituents present in the waste subject to treatment standards including underlying hazardous constituents if applicable (e.g., those hazardous constituents which make the waste characteristic or for which the waste is listed)

G.1.3.1 For Generators: Provide a determination that the hazardous waste meets or does not meet the treatment standards in [728.140](#), [728.145](#) or [728.149](#).

G.1.3.2 For Treatment Facilities: Identify the frequency that the treatment residue will be analyzed to determine compliance with the treatment standards in [728.140](#), [728.145](#) or [728.149](#).

G.2 Waste Analysis Plan: [703.183\(c\)](#), [724.113\(b\)](#) and [\(c\)](#)

Provide a copy of the waste analysis plan (WAP) that describes the methodologies for conducting the analyses required to properly treat, store, or dispose of hazardous wastes. USEPA's publication EPA/530-SW-84-012 "Waste Analysis at Facilities That Generate, Treat, Store, and Dispose of Hazardous Wastes" April 26, 1994 (PB94-963603), and most recent finalized updates, should be used to develop the WAP. The information requested below should be used to develop a table which identifies the generic waste, parameter, test method and justification for the test method.

RCRA Standardized Permit Application Instructions

G.2.1 Parameters and Rationale: [724.113\(b\)\(1\)](#)

G.2.1.1 Parameters: List the parameters chosen for analysis

G.2.1.2 Rationale: Identify a rationale for selecting these parameters and describe how analysis for these parameters will provide sufficient information on the waste's properties to safely manage the wastes at the facility.

G.2.1.3 Operational WAP Requirements: List parameters and rational required for site specific waste analysis requirements, if applicable:

- Management of ignitable, reactive, or incompatible wastes ([724.117](#)). For example, the flash point of a waste may impact the arrangement and stacking height of a container (see NFPA 30).
- Analysis of waste feed to incinerator ([724.441](#))
- Analysis of waste feed to BIF ([726.202\(b\)](#)).
- Management of wastes which have been stabilized (i.e. penetrometer test)
- Laboratory analysis no more than five years old, signed and dated, that details the chemical and physical analyses of a representative sample of the hazardous wastes managed at the site, (i.e., provide a typical analysis of an ignitable, corrosive, reactive and TCLP toxic waste, if managed)
- Describe the procedures the owner/operator of an off-site landfill receiving container sized hazardous waste will use to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container.

G.2.2 Test Methods: [724.113\(b\)\(2\)](#), [720.121](#)

G.2.2.1 Nonstandard Test Methods: If a modified or nonstandard test method is proposed, the application must include a copy of the procedure and justification for using the method. The application must document compliance with the requirements of [720.121](#) and 40 CFR 260.21(b).

G.2.2.2 Identify Test Methods: Identify the analytical test methods used to determine the concentrations of the parameters in the WAP. USEPA's publication SW-846 "Test Methods for Evaluating Solid Waste" (3rd edition and most recent finalized updates) and/or ASTM should be used to identify standardized methods.

G.2.3 Sampling Methods: [724.113\(b\)\(3\)](#), 40 CFR 261 Appendix I

The application needs to list the sampling methods used to obtain a representative sample of each waste to be analyzed.

G.2.3.1 Identify Sampling Devices and Methods: Identify the sampling devices and methods used for each waste type. [721 Appendix A](#) (Appendix I in 40 CFR 261), USEPA's publication SW-846 "Test Methods for Evaluating Solid Waste" (3rd edition and most recent finalized updates) and/or ASTM should be used to identify standardized procedures.

G.2.3.2 Nonstandard Devices or Method: If a modified or nonstandard sampling device or method is proposed, the application must include a justification for using the device or method. The entire methodology must be provided.

G.2.3.3 Sampling Strategies: Identify sampling strategy techniques (e.g. grab, composite) and why the chosen method is appropriate for the type and nature of the waste.

G.2.3.4 Multi-phase Wastes: Identify sampling procedures for multi-phase wastes if they are managed at the facility.

G.2.3.5 Safety: Identify health and safety procedures for sampling personnel.

G.2.4 Frequency of Analyses: [724.113\(b\)\(4\)](#)

Describe the frequency at which the analyses will be repeated. An analysis must be performed each time a waste changes to ensure that the analytical results are accurate, and up to date. At a minimum, wastes must be reanalyzed every 5 years or when the process generating the waste changes.

RCRA Standardized Permit Application Instructions

G.2.5 Additional Requirements for Wastes Generated Off Site: [724.113\(c\)](#)

G.2.5.1 Pre-acceptance Procedures: Describe the preacceptance procedures used to determine if the facility can receive a particular waste from off-site.

- Describe the method used to determine a representative sample of the incoming wastes (e.g. the number of drums to be sampled).
- Location on the topographic map required by Item B-2 of the decision guide/checklist

G.2.5.2 Waste Receipt Procedures: Procedures must be specified which will be used to inspect and analyze each of the hazardous wastes received at the facility to ensure that it matches the identity of the wastes designated on the accompanying manifest or shipping papers. Describe the different procedures followed for bulk (roll off boxes, tank trucks) and containerized (drummed) wastes.

G.2.5.2.1 Describe the method used to determine a representative sample of the incoming wastes (e.g. the number of drums to be sampled).

G.2.5.2.2 Describe the waste receipt inspection procedures.

G.2.5.2.3 Describe any additional waste receipt procedures followed for Lab Packs or compressed gas cylinders

G.2.5.3 Waste Acceptance Criteria: Describe the criteria used to determine whether to accept the waste. This determination should be based on the preacceptance information and results, and the data generated when the waste is received at the facility.

G.2.5.3.1 Identify the fingerprint or gate receipt analysis parameters used to verify the waste is consistent with the preacceptance analysis.

G.2.5.3.2 Identify the fingerprint parameters, or concentrations, which will trigger additional analyses and/or informational requirements from the generator.

G.2.6.2 Additional Requirements for Ignitable, Reactive or Incompatible Wastes: [724.113\(b\)\(6\)](#), [724.117](#), [724.277](#), [724.299](#)

G.2.6.1 Identification: Describe the methods used to identify ignitable, reactive or incompatible wastes.

G.2.6.2 Compatibility Testing: Describe the testing procedures conducted to determine whether wastes are compatible with each other. This requirement applies to all wastes (both hazardous and nonhazardous) if they are managed in a RCRA regulated unit at the facility. All wastes must be classified for compatibility pursuant to 40 CFR 264 Appendix V and pages B9A 9F of USEPA OSWER Doc. #9938.4. In addition any products or materials stored within the same containment system as the waste must also be evaluated for compatibility.

G.2.7 Additional Requirements for Compliance with [35 IAC 724 Subparts AA, BB, CC: 703.351\(b\)\(9\)](#), [727.110\(d\)\(2\)\(E\)](#)

When applicable, the waste analysis plan must include the methods the owner or operator will use to meet the additional waste analysis requirements for specific waste management methods, as specified in [35 IAC 724.117](#), [724.934\(d\)](#), [724.963\(d\)](#), and [724.983](#).