

**REVIEW CHECKLIST  
FOR  
USE AND MANAGEMENT OF CONTAINERS  
(§§ 264.170, 265.170, 270.15 and 270.27)**

**FACILITY:** Holloman AFB, New Mexico (near Alamogordo).

**DOCUMENT TITLE:** Parts A & B Permit (Renewal) Application.

**DOCUMENT DATE:** July 1997

**UNIT:** Container Storage

**TYPE OF PERMIT:** Operational Permit

**REVIEWER:** C. Amindyas

**DATE OF REVIEW:** 30 March - April 30, 1998

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§270.15	Specific Part B requirements for containers:	Y	Section 8 & D.	
§270.15(a)	A description of the containment system to demonstrate compliance with §264.175 including at a minimum:	Y	" "	
§270.15(a)(1)	Basic design parameters, dimensions, and materials of construction	Y	Figure B-6 section B-1;	
§270.15(a)(2)	How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system	N/A		
§270.15(a)(3)	Capacity of the containment system relative to the number and volume of containers to be stored	Y	Table D-1 on Page D-2.	
§270.15(a)(4)	Provisions for managing run-on	Y		
§270.15(a)(5)	How accumulated liquids can be analyzed and removed to prevent overflow	Y		
§270.15(b)	For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with §264.175© includes:	Y	↓	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§270.15(b)(1)	Test procedures and results or other documentation or information to show that the wastes do not contain free liquids	N/A		
§270.15(b)(2)	A description of how the storage area is designed or operated to drain or remove liquids or how containers are kept from contact with standing liquids	Y	Section D Table D-1	
§270.15©	Provide sketches, drawings, or data demonstrating compliance with §264.176 (location of buffer zone and containers holding ignitable or reactive wastes) and §264.177© (location of incompatible wastes), where applicable	Y	Tables D-1 and D-2	
§270.15(d)	Where incompatible wastes are stored or otherwise managed in containers, a descriptions of the procedures used to ensure compliance with §264.177 (a) and (b) and 264.17 (b) and c	Y	Tables D-1 and D-2	
§270.15(e)	Information regarding air emission control equipment as required in §270.27	Y	Section D-7	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§270.27(a)	If applicable, specific Part B information requirements for air emissions for containers:	Y	Section D-7	
§270.27(a)(2)	Identification of each container area subject to the requirements of 40 CFR part 264, subpart CC and certification by the owner or operator that the requirements are met	Y		
§270.27(a)(3)	Documentation that each enclosure used to control air emissions from containers are in accordance with the requirements of §264.1086(b)(2)(I) includes information prepared by the owner or operator or manufacturer or vendor describing the enclosure design and certification that the enclosure meets the specifications listed in §265.1087(b)(2)(ii)	Y	↓	
§270.27(a)(5)	Documentation for each closed-vent system and control device installed in accordance with the requirements of §264.1087 that includes design and performance information as specified in §270.24 (c) and (d)	N/A		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§270.27(a)(6)	An emission monitoring plan for both Method 21 and control device monitoring methods. The plan must include:	N/A ↓		
§270.27(a)(6)	monitoring point(s)			
§270.27(a)(6)	monitoring methods for control devices			
§270.27(a)(6)	monitoring frequency			
§270.27(a)(6)	procedures for documenting exceedances			
§270.27(a)(6)	procedures for mitigating noncompliances	↓		

HAFB

**REVIEW CHECKLIST  
FOR  
PART A APPLICATIONS  
(§270.13)**

✓

**FACILITY:** Holloman Air Force Base, New Mexico (near Alamogordo)

**DOCUMENT TITLE:** Permit Renewal Application

**DOCUMENT DATE:** July 1997

**UNIT:** Container Storage

**TYPE OF PERMIT:** Storage

**REVIEWER:** C. AMINDYAS

**DATE OF REVIEW:** April 21, 1998 through

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.13(a)	Activities conducted by the applicant that required it to obtain a permit under RCRA	Yes	Part A p. 1 of 7	
§ 270.13(b)	Name, mailing address, and location, including latitude, longitude of the facility for which the application is submitted	Yes	- "-	
§ 270.13(c)	Up to four (4) SIC Codes which best reflect the principal products or services provided by the facility	Yes		
§ 270.13(d)	Operator's name, address, telephone number, ownership status, and status as a Federal, State, private, public or other entity	Yes		
§ 270.13(e)	Name, address and phone number of the owner of the facility	Yes		
§ 270.13(f)	Whether the facility is located on Indian Lands	No		
§ 270.13(g)	Indication of whether the facility is new or existing and whether it is a first or revised application	exists Yes		
§ 270.13(h)	For existing facilities:			
§ 270.13(h)(1)	A scale drawing of the facility showing the location of all past TSDs, present TSDs, and future TSDs	Y	beginning of permit application test. - Layout Map.	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.13(h)(2)	Photograph of the facility clearly delineating all existing:	Y	Be from beginning of Part C pp B-8 & B-9	
	present TSDs	Y		
	sites of future TSDs	N/A.		
§ 270.13(i)	A description of the processes to be used to for:	Y		
	treating and capacity	N/A.		
	storage and capacity	Y		
	disposing and capacity	N/A		
§ 270.13(j)	A specification of the hazardous wastes listed or designated under 40 CFR § 261 to be treated, stored, or disposed of at the facility, an estimate of the quantity of such waste to be treated, stored, or disposed of annually, and a general description of the process to be used for such wastes	Y	Application Section B & WHP Section C.	
§ 270.13(k)	A listing of all permits or construction approval received or applied for under any of the following programs:	Y	Part A, P. 2 of 7	
§ 270.13(k)(1)	RCRA Hazardous Waste Management Program	Y		
§ 270.13(k)(2)	UIC program under Safe Drinking Water Act (SDWA)	N/A		
§ 270.13(k)(3)	NPDES program under Clean Water Act (CWA)	Y	P. 2 of 7	

§ 270.13(k)(4)	Prevention of Significant Deterioration (PSD) Program under the Clean Air Act (CAA)	Y	2-17	
§ 270.13(k)(5)	Nonattainment program under the CAA	Y	✓	
§ 270.13(k)(6)	National Emissions Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the CAA	N/A		
§ 270.13(k)(7)	Ocean Dumping Permits under the Marine Protection Research and Sanctuaries Act	N/A		
§ 270.13(k)(8)	Dredge or fill permits under section 404 of the CWA	N/A		
§ 270.13(k)(9)	Other relevant environmental permits	Y	2-17	
§ 270.13(l)	A topographic map (or other map if a topographic map is unavailable):	Y		
	extending one (1) mile beyond the property boundaries of the source	Y		
	depicting the facility and each of its intake structures	Y		
	discharge structures	N/A		
	each of its hazardous waste treatment facilities	N/A		
	each of its storage facilities	✓		
	each of its disposal facilities	N/A		
	each well where fluids from the facility are injected underground	N/A		

	wells, springs, other surface water bodies	X		
	drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility boundary	N/A		
§ 270.13(m)	A brief description of the nature of the business	Y		
§ 270.13(n)	For hazardous debris, a description of the debris category(ies) and contaminant category(ies) to be treated, stored, or disposed of at the facility.	N/A		

**NOTE:** Part A Application instructions in section XIV (Description of Hazardous Waste) requires the information in item XIV to describe all hazardous waste that will be treated, stored, or disposed of at the facility. In addition, the processes that will be used to treat, store, or dispose of each waste and the estimated annual quantity of each waste must be provided. The instructions on the form state that "For each listed waste entered in Column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

Is item XIV properly completed in accordance with the instructions? Yes

Is the annual quantity given in the correct unit of measure as required by the Part A Application Instructions? Yes

✓

## ADMINISTRATIVE REVIEW COMPLETENESS CHECKLIST FOR PERMIT APPLICATIONS

**FACILITY:** Holloman Air Force Base: New Mexico (HAFB)

**DOCUMENT TITLE:** Storage Permit Renewal Application

**DOCUMENT DATE:** 7/97

**UNIT:** Storage

**TYPE OF PERMIT:** Container Storage

**REVIEWER:** C. Ambudras

**DATE OF REVIEW:** 22<sup>nd</sup> April 1998 through

Each of the following section must be present to determine Administrative Completeness. Administrative Completeness Reviews are to determine the presence or absence of all the required parts of a Permit Application. This is not a review for Technical Adequacy.

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
	Part A review completed	Y	Pages A-1 through A-7	
§ 270.14(b)(1)	General Facility Description	Y	Section B	
§ 270.14(b)(2)	Chemical and physical analysis of:	Y		
	Hazardous Waste	Y		
	Hazardous Debris	N/A		
	Minimum information to:			
	Treat	N/A		
	Store	Y		
	Dispose	N/A		
§ 270.14(b)(3) § 264.13(b) § 265.13(b)	Waste Analysis Plan	Y	Section C	
§ 270.14(b)(4) § 264.14	Security and Security Equipment	Y	Section E	
§ 270.14(b)(5) § 264.15(b) § 265.15(b)	General Inspection Schedule	Y	Section F	
§ 270.14(b)(6) § 264.30 thru 37 § 265.30 thru 37	Procedures and Prevention Waiver Justification	N/A		
§ 270.14(b)(7) § 264.50 thru 56 § 265.50 thru 56	Contingency Plan	Y	Section H	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
	Emergency Responder List	Y	Page A-1.1	
§ 270.14(b)(8)	Procedures, Structures, Equipment to:			
	Prevent unloading hazards	Y	Section D PD-2	
	Run-on/run-off control	Y	- " -	
	Prevent contamination of water supplies	N/A	D	
	Mitigate effects of:		Section D-2	
	Equipment failure	Y	Section D-3	
	Power failure	Y		
	Prevent undue exposure of personnel	Y	✓	
§ 270.14(b)(8)	Prevent release to atmosphere	Y	Section D-7	
§ 270.14(b)(9) § 264.17 § 265.17	Procedure to prevent:			
	Accidental ignition	Y	Section D-5	
	Reaction of ignitable	Y		
	Reaction of reactives	Y		
	Reaction of incompatibles	Y	✓	
§ 270.14(b)(10)	Traffic Pattern:	Y	Section B-4	
	Volume	N/A		
	Controls	Y		
	Access	Y	✓	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.14(b)(11) § 264.18(a) § 265.18	Facility Identification and Location:	Y		
	Political boundaries	Y		
	Seismic standards	N	Section B-2	
	Floodplain	Y	↓	
	Floodplain standards	Y	↓	
	Compliance schedule	N	↓	<
§ 270.14(b)(12)	Training Program:	Y	Section J	
	Introductory	Y	↓	
	Continuing	Y	↓	
§ 270.14(b)(13)	Closure Plan	Y	Section K	
§ 270.14(b)(14)	Deed Restrictions	N/A	↓	
§ 270.14(b)(15)	Closure Cost Estimate	N/A	↓	
§ 270.14(b)(16)	Post Closure Cost Estimate	-II-	↓	
§ 270.14(b)(17/18)	Financial Assurance	-II-	↓	
§ 270.14(b)(19)	Topographic Map	Y	↓	
§ 270.14(b)(20)	Groundwater Monitoring Plan	Y	Section K-7	
Specific Unit Part B Application	Description of Specific Units Provided:			
	Landfills	N/A		
	Land Treatment Units	N/A		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
	Surface Impoundments	N/A		
	Waste Piles			
	Tank Systems			
	Use and Management Containers			
	Incinerators			
	Short Term Incinerators			
	Miscellaneous Units			
	Process Vents			
	Equipment	✓		
	Containment Buildings	N/A		
	Drip Pads	N/A		
Other Permits	Permit by Rule	N/A		
	Emergency			
	Hazardous Waste Incinerators			
	Land Treatment Demonstration			
	Interim Permit for UIC Wells			
	Research Development and Demonstration			
	Boilers and Industrial Furnaces	✓		

**REVIEW CHECKLIST  
FOR  
PART B GENERAL REQUIREMENT  
(§ 270.14)**

**FACILITY:** Holloman Air Force Base New Mexico (Alamogordo) <sup>NSA</sup>

**DOCUMENT TITLE:** Permit Renewal Application

**DOCUMENT DATE:** July 1997

**UNIT:** Container Storage Operational Permit

**TYPE OF PERMIT:** Storage

**REVIEWER:** C. Dominguez

**DATE OF REVIEW:** 21<sup>st</sup> April 1998 through

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.14(b)(1)	General description of the facility or unit.	Y	Section B	
§ 270.14(b)(2)	Chemical and/or physical analyses which must be known to treat/store/dispose of waste.	Y	Section C	
§ 270.14(b)(3)	Waste analysis plan required to comply with:	Y	Section C-2	
§ 264.13(b)	Develop and follow a written waste analysis plan.	Y	- " -	
§ 264.13(c)	Off-site waste analysis requirements.	N/A	-	
§ 270.14(b)(4)	Security requirements under § 264.14 required.	Y	Section E	
§ 270.14(b)(5)	General inspection schedule in compliance with §264.15(b). Specific requirements of:	Y	Section F	
§ 264.174	Container inspections	Y	Section F-2	
§ 264.193(i)	Tank inspections	N/A		
§ 264.195	Overfill control inspections	N/A		
§ 264.226	Surface impoundments monitoring and inspection	↓		
§ 264.254	Waste pile monitoring and inspection	↓		
§ 264.273	Land treatment design and operating requirements	N/A		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 264.303	Landfill monitoring and inspection	N/A		
§ 264.602	Miscellaneous units			
§ 264.1033	Process vent standards			
§ 264.1052	Equipment leak air emission standards	Y	Section D-7	
§ 264.1053	Compressor standards	N/A		
§ 264.1058	Standards for pumps, valves, pressure relief devices flanges and connections.			
§ 270.14(b)(6)	Justification of any waiver requests for § 264 Subpart C.	N/A		
§ 270.14(b)(7)	Requirements for a contingency plan under § 264 Subpart D with specific requirements under:	Y	Section H	
§ 264.227	surface impoundment emergency repairs.	N/A		
§ 270.14(b)(8)	description of procedures and equipment used to:			
§ 270.14(b)(8)(i)	prevent hazards in unloading operations (ramps, and special forklifts)	N/A		
§ 270.14(b)(8)(ii)	runoff prevention with berms, trenches, and dikes.	Y	Section B-4	page B-11
§ 270.14(b)(8)(iii)	Prevent contamination of water supplies	Y	Section D-8	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.14(b)(8)(iv)	mitigate effects of equipment failure and power outages	N/A		
§ 270.14(b)(8)(v)	prevent undue exposure of personnel by use of personal protective equipment (PPE)	Y	Section C.4.4	
§270.14(b)(8)(vi)	prevent release to the atmosphere	Y	" C-7	
§270.14(b)(9)	description of controls of ignitable/reactive waste with specific requirements of: § 264.17 separated and protected from ignition and reaction	Y	Section D-5	
§264.17(c)	documentation of compliance with § 264.17	Y	Section B-4	
§270.14(b)(10)	traffic pattern studies that estimate volume and number of types of vehicles	Y	" - B-4	
	identify turn lanes	Y		
	identify traffic/stacking lanes	Y		
	describe road surface	Y		
	describe road load bearing capacity	Y		
	identify type and number of traffic controls	Y		
§ 270.14(b)(11)	Facility/unit location information:	Y	Section B-2	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
(i)	seismic standard (264.18(a))	Y	Section B-2	
(ii)	Seismic standard must show:	N/A		→ Otero County, where HAFB is
(A)	no fault within 3,000' with displacement in Holocene time (within the last 10,000 yrs)	N/A		located is exempt from State & EPA seismic considerations
	Published geologic studies	N/A		
	Aerial reconnaissance of a five (5) mile radius from the facility/unit	N/A		
	Analysis of aerial photographs covering 3,000' radius from the facility/unit	N/A		
	Walking studies of the radius if needed	N/A		
(B)	If faults (to include lineations) which have displacement in Holocene time are present within 3,000', no faults pass with 200' of the portions of the facility where treatment, storage or disposal will be conducted	N/A		
(iii)	100 year flood plain information	Y	Section B-2	
(iv)	If in the 100 year flood <del>plain</del> : plain	N/A		→ facility is not in 100-yr flood plain
(A)	Engineering analysis of hydrostatic forces expected in a 100 year flood.	N/A		
(B)	Structural engineering studies for flood protection to prevent washout.	↓		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
(C)	Detailed description of procedures to remove hazardous waste to safety before flood reaches the waste:	N/A		→ HARB is not in a 100-yr flood plain
	Reaches the waste, including:			
(1)	timing of removal			
(2)	Location to be moved to			
(3)	dedicated equipment and personnel to ensure removal			
(4)	Potential for accidental discharge during movement.			
(v)	Plan to show how the facility will be brought into compliance with § 264.18(b). (Flood control)	Y		
§ 270.14(b)(12)	Training program introductory/ continuing in accordance with § 264.16.	Y	Section J	
	Must be designed to meet §264.16(a)(3) job task descriptions.	Y	Section J-2	
§ 270.14(b)(13)	Closure plan designed to meet:	Y	Section K	
§ 264.112	Amendment to closure plan	Y	Section K-8	
§ 264.118	Post closure plan amendment	Y	- 11 -	
	Or if applicable:			
§ 264.178	containers	N/A		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 264.197	tanks	N/A		
§ 264.228	surface impoundments			
§ 264.258	waste piles			
§ 264.280	land treatment			
§ 264.310	landfills			
§ 264.351	incinerators			
§ 264.601	miscellaneous units			
§ 264.603	requirements by the Secretary			
§ 270.14(b)(14)	Disposal units must comply with § 264.119			
§ 270.14(b)(15)	Closure cost estimates § 264.142	N/A		HAFB is exempt as a Federal Facility
	Financial Assurance § 264.143			
§ 270.14(b)(16)	Post Closure Care Cost Estimate § 264.144			
	Post closure care financial assurance § 264.145			
§ 270.14(b)(17)	Copy of insurance policy § 264.147, 264.147(a), 264.147(b), 264.147(c)			
§ 270.14(b)(18)	State financial mechanism § 264.149 and/or 264.150	N/A		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.14(b)(19)	Topographic Map Requirements: 1,000' around the facility/unit with at least a 1" (2.5 cm) = 200' (61 meters) scale and a contour interval of at least 5' (1.5 meters) if the relief is greater than 20' (6.1 meters) or 2' (.6 meters) if less than 20' (6.1 meters).	Y	Section B-3	
(i)	map scale and date	Y		topo maps of the site but the southern & northern half of the base do not overlap as expected.
(ii)	100 year flood plain	N/A		
(iii)	surface water locations	Y	see maps in Section B-3	
(iv)	surrounding land use	Y		
(v)	wind rose	Y		
(vi)	map orientation (N)	Y		
(vii)	legal boundaries	Y		
(viii)	access controls	Y		
(ix)	injection/withdrawal well location on and off-site	N/A		
(x)	Buildings:			
	TSD Operations	Y	Drawings 38 through 32 & drawing 4.	
	Run-on/run-off control	Y	Section B-4	
	Sewer lines: storm	Y	Engineering Report Vol. II	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
	sanitary	Y	Vol. III &	Drawing # 4
	Process	Y		
	Loading/unloading areas	Y	Section B-4	
	Fire control information	Y	↓	
(xi)	Barriers for drainage or flood control	Y		
(xii)	Location of operational units within the HWM Facility site showing where hazardous waste will be treated/stored/disposed of including equipment cleanup.	Y		Drawing #4; Vol. III
§ 270.14(b)(20)	Compliance with other federal laws and regulations as required under 270.3:	Y		
(a)	Wild and Scenic Rivers Act	Y		
(b)	National Historic Preservation Act	Y		
(c)	Endangered Species Act	Y		
(d)	Coastal Zone Management	N/A		
(e)	Fish and Wildlife Coordination Act	N/A		
(f)	Executive Orders	N/A		
§ 270.14(b)(21)	Compliance with Land Disposal Restrictions under § 268.5 and 268.6	Y	Section 2.	Vol I

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.14(c)	Additional information as required under 264.90(b) ground water:	Y	Section D-8	
§ 270.14(c)(1)	Ground water monitoring under § 265.90 through 265.94	Y	↓	
§ 270.14(c)(2)	Identification of uppermost aquifer, ground water flow rate and direction	N/A		
§ 270.14(c)	Additional information as required under 264.90(b) ground water: (continued)	✓		
§ 270.14(c)(3)	A topographic map required under 270.14(b)(19) that identifies proposed point of compliance as required by 264.95.	N/A		
§ 270.14(c)(3)	Proposed location of ground water monitoring wells under 264.97	N/A →		
§ 270.14(c)(4)	description of plume of contamination that has entered the ground water from a regulated unit at the time the application was submitted	N/A ↓		
(i)	extent of plume indicated on topographic map required by 270.14(b)(19)	↓ ✓		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
(ii)	identification of constituents and concentration for appendix IX of § 264	N/A		
§ 270.14(c)(5)	Detailed plan and an engineering report describing proposed ground water monitoring program under § 264.97.	N/A		
§ 270.14(c)(6)	If no releases are detected at date of submittal then follow § 264.98	N/A		
(i)	List of proposed: indicator parameters, waste constituents, reaction products that can provide reliable indication of presence of hazardous constituents in the ground water.	↓		
(ii)	Proposed ground water monitoring system	N/A	Vadose Zone Section D-8	
(iii)	Background values for each proposed monitoring parameter	N/A		
(iv)	Description of proposed sampling, analysis and statistical comparisons to be used	N/A		
§ 270.14(c)(7)	If a release is detected at the point of compliance then § 264.99 requires corrective action to be made under 264.100	↓		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.15	Container Storage Information	Y	Sections A	through N (Whole Part B)
§ 270.16	Tank Storage Information	N/A		
§ 270.16(a)	Written assessment of tank, structural integrity and suitability submitted by an independent, certified, registered professional engineer	N/A		
§ 270.16(b)	Dimensions and capacity of each tank			
§ 270.16(c)	Feed system description			
§ 270.16(d)	Piping diagram			
§ 270.16(e)	External corrosion protection description as required by § 264.192(a)(3)(ii)			
§ 270.16(f)	New tank installation as required by § 264.192(b) and (c)			
§ 270.16(g)	Detailed description of the secondary containment as required by § 264.193(a) through (f)			
§ 270.16(h)	Request for variance under § 264.193			
§ 270.16(i)	Description of procedures and controls to prevent spills and overflows 264.194(b)	N/A		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§ 270.16(j)	Detailed description of compliance with 264.198 and 264.199 for tanks containing reactive/ignitable waste.	N/A		

**REVIEW CHECKLIST  
FOR  
WASTE ANALYSIS PLAN  
(§ 264.13)**

**FACILITY:** HAFB - Holloman Air Force Base, New Mexico (near Alamogordo)

**DOCUMENT TITLE:** Parts B & A Permit Renewal Application

**DOCUMENT DATE:** July 1997

**UNIT:** Storage

**TYPE OF PERMIT:** Container Storage Operational Permit.

**REVIEWER:** C. Amindras

**DATE OF REVIEW:** 4/22 through 96

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§264.13	<b>General waste analysis</b>			
§264.13(a)(1)	Before an owner or operator treats, stores, or disposes of any hazardous wastes, or nonhazardous wastes if applicable under § 264.113(d), he must obtain a detailed chemical and physical analysis of a representative sample of the wastes. At a minimum, the analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with this part and part 268 of this chapter.	Y	Section C	
§264.13(a)(2)	The analysis may include data developed under part 261 of this chapter, and existing published or documented data on the hazardous waste or on hazardous waste generated from similar processes.	Y	- 11 -	
§264.13(a)(3)	The analysis must be repeated as necessary to ensure that it is accurate and up to date. At a minimum, the analysis must be repeated:	Y	Section 2.2	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
(i)	When the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous wastes, or non-hazardous wastes if applicable under § 264.113(d), has changed; and	N/A		
(ii)	For off-site facilities, when the results of the inspection required in paragraph (a)(4) of this section indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper.	N/A		
§264.13(a)(4)	The owner or operator of an off-site facility must inspect and, if necessary, <u>analyze each hazardous waste</u> movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.	yes <sup>but</sup> N/A	Section C	- waste is analyzed on-site.

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§264.13(b)	The owner or operator must develop and follow a written waste analysis plan which describes the procedures which he will carry out to comply with paragraph (a) of this section. He must keep this plan at the facility. At a minimum, the plan must specify:	Y	Section C of Part B Application	
§264.13(b)(1)	The parameters for which each hazardous waste, or non-hazardous waste if applicable under § 264.113(d), will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to comply with paragraph (a) of this section);	Y	Section C-3 Table C-1	
§264.13(b)(2)	The test methods which will be used to test for these parameters;	Y	Table C-1	under Section C of Part B Application
§264.13(b)(3)	The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:	Y	Section C-4	
(i)	One of the sampling methods described in appendix I of part 261 of this chapter; or	Y	- 4 -	
(ii)	An equivalent sampling method.	Y	- 11 -	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§264.13(b)(4)	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date; and	Y	Section C-4	
§264.13(b)(5)	For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply.	N/A		
§264.13(b)(6)	Where applicable, the methods that will be used to meet the additional waste analysis requirements for specific waste management methods as specified in §§ 264.17 (ignitable, reactive, or incompatible), 264.314 (bulk & containerized liquids), 264.341 (waste analysis for <del>incinerators</del> ), 264.1034(d) (subpart AA), 264.1063(d) (subpart BB), 264.1083 (subpart CC), and 268.7 (LDR) of this chapter.	Y N/A	Section C Table C-1	provides required details.
§264.13(b)(7)	For surface impoundments exempted from land disposal restrictions under § 268.4(a), the procedures and schedules for:	N/A		
(i)	The sampling of impoundment contents;			
(ii)	The analysis of test data; and,			

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
(iii)	The annual removal of residues which are not delisted under § 260.22 of this chapter or which exhibit a characteristic of hazardous waste and either:	N/A		no disposal conducted at HAFB.
(A)	Do not meet applicable treatment standards of part 268, subpart D; or			
(B)	Where no treatment standards have been established;			
(1)	Such residues are prohibited from land disposal under § 268.32 or RCRA section 3004(d); or			
(2)	Such residues are prohibited from land disposal under § 268.33(f).			
§264.13(b)(8)	For owners and operators seeking an exemption to the air emission standards of subpart CC in accordance with § 264.1082-			
(i)	If direct measurement is used for the waste determination, the procedures and schedules for waste sampling and analysis, and the results of the analysis of test data to verify the exemption.	V		

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
(ii)	If knowledge of the waste is used for the waste determination, any information prepared by the facility owner or operator or by the generator of the hazardous waste, if the waste is received from off-site, that is used as the basis for knowledge of the waste.	Yes	Section C	→ Knowledge of process is <u>NOT</u> used in lieu of analysis
§264.13(c)	For off-site facilities, the waste analysis plan required in paragraph (b) of this section must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. At a minimum, the plan must describe:	Yes	Section C	→ Sampling & Analysis are done as per EPA approved methods listed in Table C-1.
§264.13(c)(1)	The procedures which will be used to determine the identity of each movement of waste managed at the facility; and	Y	- 11 -	
§264.13(c)(2)	The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling.	Y	Section C-4	

Regulatory Citation(s):	Requirement:	Provided: Yes/No/NA	Location:	Comments:
§264.13(c)(3)	The procedures that the owner or operator of an off-site landfill receiving containerized hazardous waste will use to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container.	N/A		