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FAX COVER SHEET

DATE: 11/29/99

TO: Pat Conser

COMPANY: Mat. Watson

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MESSAGE: Pat - These are my comments based on the EPA
checklists. I think they are pretty minor. Some
may have been addressed and I missed them. Please
let me know. Also - the comments don't address
Sections 3, 4, & 8.

FROM: Stephanie Kruse

NO. OF PAGES: 6
(Including cover page)

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RED G/99

**EPA Checklist Review Comments
Triassic Park Permit Application**

B-2a: Access Control	270.14(b)(19) (viii)			Pls show Facility and working area fences on map in Part A.
C-2: Waste Analysis Plan	270.14(b)(3); 264.13(b); 264.13(c)			(Working on it.)
D-1a(2): Container Manage- ment Practice	270.14(a); 264.173	Containers must be kept closed and must not be handled in any manner which could cause them to rupture or leak. Specify aisle space and stacking height.	V.1, 5.3.5; 5.4.1	Pls specify stacking height.
F2b(2)(e): Tank System Cathodic Protection	270.14(b)(5); 264.195(c)	Inspect according to schedule.		Pls add cathodic protection system to §5.2.5 and Table 5-1 and provide an inspection checklist.
F2b(4)(b): Structural Integrity	270.14(b)(5); 264.226(c)	Specify procedure for assessing integrity of surface impoundments.		This § refers to engineering certification for dikes at certain periods. Please address.
F2b(6)(a): Run-On and Run- Off Control System	270.14(b)(5); 264.303(b)	Deterioration, malfunction, or improper operation of run-on and run-off control system.		Please add inspections for the run-on/run- off systems to §5.0.

F2b(6)(b): Wind Dispersal Control System	270.14(b)(5); 264.303(b)(2)	Proper functioning of wind dispersal control systems, when present.		Refers to landfills. Clarification of §5.4.8 was discussed during a meeting with Pat Corser on 9/23/99.
F2b(6)(c): Leachate Collection and Removal System	270.14(b)(5); 264.303(b)(3); 264.303(c)	In properly functioning double liner system, 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.		Pls address this requirement.
F3(c)(i): Police/ Fire Department	270.14(b); 264.37(a)(1)	Arrange to familiarize local fire department and police with Facility.		Pls add this requirement to §6.3.4.
F-4a: 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 eliminate possibility of these hazards.	V.I., 5.2.9	1 sentence in text. Pls expand.
F-5b(1): Document- ation of Adequacy of Procedures	270.14(b); 264.17(c)	Published literature, trial test, waste analyses, or similar processes may be used.		Pls add sentence to cover this.

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 the same container.		Will be in WAP? Elsewhere?
G-4j(5): Provisions of Secondary Containment, Repair, or Closure	270.14(b)(7); 264.196(e)	Provision of secondary containment repair, otherwise closure is required.		Refers to tanks. Pls add "otherwise closure is required" sentence to §2.4.11.
G-8: Required Report Procedures for Record-keeping and Reporting to State	270.14(b)(7); 264.56(j)	Owner/operator must note on operating record the time, date, and details of incidents which require implementation of Contingency Plan.		Pls address this requirement in §6.5.
G-9: Location and Distribution of Contingency Plan	270/14(b)(7); 264.53	Copy of Contingency Plan must be maintained at Facility and submitted to local authorities.	V.I, 6.5	Pls add that Contingency Plan will be provided to local authorities.
H-2: Maintenance of Training Records/ Copy of Personnel Training Documents	270.14(b)(12); 264.16(b); 264.16(d); 264.16(e)	Training records on current personnel must be kept until closure of Facility. Training must be completed within 6 months after date of employment.		Pls add sentence stating training will be completed within 6 months of employment.

I-1b: Time and Activities Required for Partial Closure and Final Closure Activities	270.14(b)(13); 264.112(b)(1)-(7)	Describe the time and all activities required for: partial closure, if applicable; final closure; and maximum extent of operation that will be active during life of Facility.	V.I., 8.1.4	Pls add (264.112(b)(3)) estimate of the maximum inventory of hzds wstes ever on site over the active life of the Facility
I-1e(4): Closure of Containers	270.14(b)(13); 264.178; 264.112(b)(3)	Address the following: hazardous waste removal and disposal; container decontamination and disposal including linings, soil, and washes; maximum inventory.	V.I., 8.1.1.2	Pls address container decon and disposal; maximum inventory.
I-1e(5): Closure of Tanks	270.14(b)(13); 264.197; 264.112(b)(3)	The description should address the following: Decontamination of all components; verification of decontamination; disposal of wastes and residues; and maximum inventory.	V.I., 8.1.3; 8.4	Pls address maximum inventory.
I-3b: Survey Plat	270.14(b)(13); 264.116			Pls add a sentence addressing the requirement of 264.116.
I-3d: Post-Closure Notices	270.14(b)(13); 270.14(b)(14); 264.119			Pls address the requirements of 264.119.

K-1: Other Federal Laws	270.14(b)(20); 270.3	Demonstrate compliance with requirements of applicable Federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, and Fish and Wildlife Coordination Act	V.I., 1.2	Pls contact US Fish and Wildlife regarding the proposed Facility and discuss results in §1.2.
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Note: HRMB expects significant revisions to Sections 3 (Ground Water Protection/Vadose Zone Monitoring), 4 (Waste Analysis Plan), and 8 (Closure/Post-Closure Care).