



AHWMA/RCRA POST-CLOSURE PERMIT APPLICATION COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

DISCLAIMER: This checklist is not an official ADEQ policy document. This checklist is a tool used by ADEQ permit writers to evaluate hazardous waste permit applications. The checklist is periodically revised by ADEQ, following the adoption of new regulatory requirements.

NOTE: An agency shall not base a licensing decision in whole or in part on a licensing requirement or condition that is not specifically authorized by statute, rule or state tribal gaming compact. A general grant of authority in statute does not constitute a basis for imposing a licensing requirement or condition unless a rule is made pursuant to that general grant of authority that specifically authorizes the requirement or condition. This section may be enforced in a private civil action and relief may be awarded against the state. The court may award reasonable attorney fees, damages and all fees associated with the license application to a party that prevails in an action against the state for a violation of this section. A state employee may not intentionally or knowingly violate this section. A violation of this section is cause for disciplinary action or dismissal pursuant to the agency's adopted personnel policy. This section does not abrogate the immunity provided by section 12-820.01 or 12-820.02.

Note: This checklist may be used for review of a permit application for a post-closure facility with no active hazardous waste management units. It provides a guideline to the basic requirements of a Part B post-closure permit application. Optional elements (contingency plan and personnel training) are indicated by italics. If a post-closure unit is present at a facility seeking a permit for active hazardous waste management units, the post-closure unit must be incorporated in the permit application like an operating unit in all appropriate sections.

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS				
POST-CLOSURE FACILITY REQUIREMENTS				
Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-1 Description of Activities Conducted which Require Facility to Obtain a Permit under the Resource Conservation and Recovery Act (RCRA) and Brief Description of Nature of the Business	270.13(a),(m)			
PC-2 Name, Mailing Address, and Location of Facility for which the Application is Submitted, including a Topographic Map	270.13(b),(1)			
PC-3 Up to four Standard Industrial Classification Codes (SIC) which Best Reflect the Products or Services Provided by the Facility	270.13(c)			
PC-4 Operator/Owner's Name, Address, Telephone Number, and Ownership Status	270.13(d),(e)	Ownership status must include status as federal, state, private, public, or other entity.		
PC-5 Facility is New, Existing, or Located on Indian Lands	270.13(f),(g)	Description must include information on whether this is a first or revised application with date of last signed permit application.		

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS**POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-6 Description of Processes for Disposing of Hazardous Waste	270.13(i)	Description must include design capacity for these items.		
PC-7 Specification of the Hazardous Wastes Listed or Designated Under Title 40 of the Code of Federal Regulations (40 CFR) Part 261	270.13(j)	Specifications must include estimate on quantity of waste to be disposed of.		
PC-8 Listing of all Permits or Construction Approvals Received or Applied for	270.13(k)	Permits include the following programs: Hazardous Waste Management under RCRA; Underground Injection Control under Solid Waste Disposal Act; Prevention of Significant Deterioration, Nonattainment Program, and National Emissions Standards for Hazardous Pollutants under the Clean Air Act; ocean dumping permits under the Marine Protection Research and Sanctuaries Act; dredge and fill permits under Section 404 of the Clean Water Act; or other relevant environmental permits including state permits.		
PC-9 Part B General Description	270.14(b)(1)			
PC-10a Topographic Map	270.14(b)(19)	Show distance of 1,000 feet around unit at a scale of 1 inch to not more than 200 feet (multiple maps may be submitted at this scale), and should be similar to Part A topographic map.		
PC-10a(1) Scale and Date	270.14(b)(19)(i)	Other scales may be used if justified.		
PC-10a(2) The 100-Year Flood Plain Area	270.14(b)(19)(ii)			
PC-10a(3) Surface Waters	270.14(b)(19)(iii)			

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-10a(4) Surrounding Land Use	270.14(b)(19)(iv)			
PC-10a(5) Wind Rose	270.14(b)(19)(v)			
PC-10a(6) Map Orientation	270.14(b)(19)(vi)			
PC-10a(7) Legal Boundaries	270.14(b)(19)(vii)			
PC-10a(8) Access Control	270.14(b)(19)(viii)			
PC-10a(9) Injection and Withdrawal Wells (on site and off site)	270.14(b)(19)(ix)			
PC-10a(10) Buildings and Other Structures	270.14(b)(19)(x)			
PC-10a(11) Drainage and Flood Control Barriers	270.14(b)(19)(xi)			
PC-10a(12) Location of the Disposal Unit(s)	270.14(b)(19)(xii)			
PC-10a(13) Location of Solid Waste Management Units	270.14(d)(1)(i)			
PC-10b Additional Information on the Topographic Map for Land Disposal Facilities	270.14(c)(3)			
PC-10b(1) Waste Management Areas	270.14(c)(3)			
PC-10b(2) Property Boundaries	270.14(c)(3)			
PC-10b(3) Point-of-Compliance Location	270.14(c)(3); 264.95	Point of compliance is defined in 264.95 (Also see guidance in the Federal Register, Vol.1 No. 85, May 1, 1996, p 19432. Advanced Notice of Proposed Rulemaking)		
PC-10b(4) Location of Groundwater Monitoring Wells	270.14(c)(3); 264.97			

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PC-10c	Uppermost Aquifer and Hydraulically Connected Aquifers Beneath Facility Property	270.14(c)(2)		
PC-10d	Groundwater Flow Direction	270.14(c)(2), (3)	Should be included on the topographic map, if possible.	
PC-11a	Seismic Requirements			
PC-11a(1)	Political Jurisdiction in which Facility is Proposed to be Located	270.14(b)(11)(i)		
PC-11a(2)	Indication of Whether Facility is Listed in Appendix VI of 264 (New Facilities)	270.14(b)(11)(i)		
PC-11a(3)	New Facility must be Located at Least 200 feet from a Fault which has had Displacement in Holocene Time	270.14(b)(11)(ii); 264.18(a)	If facility location is listed in Appendix VI of 264, this information is required.	
PC-11b	Flood Plain Requirements	270.14(b)(11)(iii), (iv); 264.18(b)		
PC-11b(1)	Copy of Federal Insurance Administration or other Flood Map	270.14(b)(11)(iii)	Reference source used to determine whether facility is located in 100-year flood plain.	
PC-11b(2)	Engineering Analysis to Indicate the Various Hydrodynamic and Hydrostatic Forces Expected to Result from the 100-Year Flood Plain	270.14(b)(11)(iv) (A); 264.18(b)	Flood plain requirements applicable if facility is located in 100-year flood plain.	

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-11b(3)	Structural or other Engineering Studies showing the Design of Operational Units and Flood Protection Devices and how these will Prevent Washout	270.14(b)(11)(iv) (B); 264.18(b)	Flood plain requirements applicable if facility is located in 100-year flood plain.	
PC-11b(4)	Plan and Schedule for Future Compliance	270.14(b)(11)(v)	Flood plain requirements applicable if facility is located in 100-year flood plain and not in compliance with 264.18(b).	
PC-11c	Interim Status Groundwater Monitoring Data	270.14(c)(1)		
PC-11c(1)	Description of Wells	270.14(c)(1)	A copy of topographic map required by 270.14(b) on which location and identification of each interim status monitoring well is indicated. Details of design and construction of each interim status monitoring well.	
PC-11c(2)	Description of Sampling and Analysis Procedures	270.14(c)(1); 265.92	A copy of facility's groundwater sampling and analysis plan.	
PC-11c(3)	Monitoring Data	270.14(c)(1); 265.92	Provide all interim status monitoring results.	
PC-11c(4)	Statistical Procedures	270.14(c)(1); 265.93	Provide information relating to statistical procedures.	
PC-11c(5)	Groundwater Assessment Plan	270.14(c)(1); 265.93(d)(2)	If required, based on statistical comparison results, provide plan implemented for groundwater quality assessment program along with results obtained from implementation of plan.	
PC-12	General Hydrogeologic		Include description of the regional and site-	

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
Information	270.14(c)(2)	specific geologic and hydrogeological setting.		
PC-13 Contaminant Plume Description	270.14(c)(2), (4), (7); Part 261, Appendix VIII	In some cases, contaminant plumes may have been defined under groundwater quality assessment programs carried out during the interim status period which may not address the complete list of Appendix IX constituents as required under 270.14(c)(4). Additional monitoring may be required to identify the concentration of each Appendix VIII constituent in the plume.		
PC-14 General Monitoring Program Requirements	270.14(c)(5); 264.90(b)(4); 264.97			
PC-14a Description of Wells	270.14(c)(5); 264.97(a),(b),(c)			
PC-14b Description of Sampling and Analysis Procedures	270.14(c)(5); 264.97(d),(e),(f)			
PC-14c Procedures for Establishing Background Quality	270.14(c)(5); 264.97(a)(1),(g)			
PC-14d Statistical Procedures	270.14(c)(5); 264.97(h), (i)(1),(5),(6)			
PC-14d(1) Parametric Analysis of Variance (ANOVA)	270.14(c)(5); 264.97(h)(1), (i)(2)			
PC-14(2) Nonparametric ANOVA	270.14(c)(5); 264.97(h)(2), (i)(2)			

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-14d(3) Tolerance or Prediction Interval Procedure	270.14(c)(5); 264.97(h)(3), (i)(4)			
PC-14d(4) Control Chart Approach	270.14(c)(5); 264.97(h)(4), (i)(3)			
PC-14d(5) Alternative Approach	270.14(c)(5); 264.97(h)(5),(i)			
PC-15 Detection Monitoring Program	270.14(c)(6); 264.91(a)(4); 264.98			
PC-15a Indicator Parameters, Waste Constituents, Reaction Products to be Monitored	270.14(c)(6) (i); 264.98(a)			
PC-15b Groundwater Monitoring System	270.14(c)(6) (ii); 264.97(a) (2),(b),(c); 264.98(b)	Identify number, location, and depth of each well, and describe well construction materials.		
PC-15c Background Groundwater Concentration Values for Proposed Parameters	270.14(c)(6) (iii); 264.97 (g); 264.98(c), (d)			
PC-15d Proposed Sampling and Analysis Procedures	270.14(c)(6)(iv); 264.97(d),(e),(f); 264.98(d),(e),(f)			
PC-15e Statistically Significant Increase in any Constituent or Parameter Identified at any Compliance Point Monitoring Well	270.14(c)(6); 264.98(g); Part 264 Appendix IX			

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-16 Compliance Monitoring Program	270.14(c)(7); 264.99			
PC-16a Waste Description	270.14(c)(7)(i)	Description must include historical records of volumes, types, and chemical composition of waste placed in units in waste management areas.		
PC-16b Characterization of Contaminated Groundwater	270.14(c)(7)(ii)	For each well at point of compliance and for each background well, provide concentrations of each constituent in 261 Appendix VIII, major cations and anions, and constituents listed in Table 1 of 264.94, if not already mentioned above.		
PC-16c Hazardous Constituents to be Monitored in Compliance Program	270.14(c)(7)(iii); 264.98 (g)(3); 264.99 (a)(1)			
PC-16d Concentration Limits	270.14(c)(7)(iv); 264.94, 264.97(g),(h); 264.99(a)(2)			
PC-16e Alternate Concentration Limits	270.14(c)(7)(iv); 264.94(b); 264.99 (a)(2)	Provide justification for establishing alternate concentration limits. Justification must address the following two factors.		
PC-16e(1) Adverse Effects on Groundwater Quality	270.14(c)(7)(iv); 264.94(b)(1)			
PC-16e(2) Potential Adverse Effects	270.14(c)(7)(iv); 264.94(b)(2)			
PC-16f Engineering Report Describing	270.14(c)(7)(v);	Provide details supporting representative nature		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
Groundwater Monitoring Systems	264.95; 264.97(a)(2), (b),(c); 264.99(b)	of groundwater quality at background monitoring points and compliance monitoring point.		
PC-16g Groundwater Monitoring Well Design	264.97(c)	Wells must be designed in accordance with American Society for Testing and Materials standards. Any well within loess must be designed to minimize turbidity.		
PC-16h Proposed Sampling and Statistical Analysis Procedures for Groundwater Data	270.14(c)(7) (vi); 264.97 (d),(e),(f); 264.99(c) - (g)			
PC-17 Groundwater Protection Standard Exceeded at Compliance Point Monitoring Well	270.14(c)(8); 264.99(h),(i)			
PC-17a Corrective Action Program	270.14(c)(8); 264.99(j); 264.100	If hazardous constituents have been detected in the groundwater, an owner or operator must submit sufficient information, supporting data, etc., to establish a corrective action program that meets the requirements of 264.100.		
PC-17b Characterization of Contaminated Groundwater	270.14(c)(8)(i)	For each well at point of compliance and for each background well, provide concentrations of each constituent in 261 Appendix VIII, major cations and anions, and constituents listed in Table 1 of 264.94, if not already determined by the above.		
PC-17c Concentration Limits	270.14(c)(8)(ii); 264.94; 264.100(a)(2)	Specify the proposed concentration limits for each hazardous constituent in groundwater.		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-17d Alternate Concentration Limits	270.14(c)(8)(ii); 264.94(b); 264.100(a)(2)	Provide a justification for establishing alternate concentration limits. This justification must address each of the following two factors.		
PC-17d(1) Adverse Effects on Groundwater Quality	270.14(c)(8); 264.94(b)(1)			
PC-17d(2) Potential Adverse Effects	270.14(c)(8); 264.94(b)(2)			
PC-17e Corrective Action Plan	270.14(c)(8)(iii); 264.100(b)	Provide detailed plans and engineering report on corrective actions proposed for facility, including maps of engineered structures, construction details, plans for removing waste, description of treatment technologies, effectiveness of correction program, description of reinjection system, additional hydrogeologic data, operation and maintenance plans, and closure and post-closure plans.		
PC-17f Groundwater Monitoring Program	270.14(c)(8)(iv); 264.100(d)			
PC-17f(1) Description of Monitoring System	270.14(c)(7)(v), (8)			
PC-17f(2) Description of Sampling and Analysis Procedures	270.14(c)(7)(v), (8)			
PC-17f(3) Monitoring Data and Statistical Analysis Procedures	270.14(c)(7)(v), (8)			
PC-17f(4) Reporting Requirements	270.14(c)(7); 264.100(g)			

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-18 Security	270.14(b)(4); 264.14	Demonstrate that ongoing post-closure use does not allow disturbance of the integrity of the final cover, liner(s), or any other components of the containment system, or the function of the facility's monitoring system.		
PC-18a Security Procedures and Equipment	270.14(b)(4); 264.14	Unless waiver is granted, facility must have surveillance system or barrier or other means to control entry.		
PC-18b Warning Signs	270.14(b)(4); 264.14(c)	Signs in English must be posted at each entrance, and be legible from 25 feet.		
PC-19 Inspection Schedule	270.14(b)(5); 264.15	Include where applicable, as part of the post-closure inspection schedule, specific requirements for each type of disposal facility. These specific requirements and the schedule should be included as part of the post-closure plan.		
PC-19a General Inspection Requirements	270.14(b)(5); 264.15(a), (b); 264.33	Describe the inspections to be conducted during the post-closure care period, their frequency, the inspection procedure, and the logs to be kept. Inspection is required for monitoring equipment, safety emergency equipment, communication and alarm systems, decontamination equipment, security devices, and operating and structural equipment. Should be included as part of post-closure plan.		
PC-19b Types of Problems	270.14(b)(5); 264.15(b)(3)	Inspection checklist should be included as part of post-closure plan and must identify types of problem.		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-19c Frequency of Inspections	270.14(b)(5); 264.15(b)(4)	The rationale for determining the length of time between inspections should be provided as part of the post-closure plan.		
PC-19d Schedule of Remedial Action	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.		
PC-19e Inspection Log	264.15(d)	Provide example log or summary. Should be included as part of the post-closure plan		
PC-20 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.		
PC-21 Emergency Equipment	270.14(a); 264.32(c)	Demonstrate that portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment are available, if necessary.		
PC-21a Water and Fire Control	270.14(a); 264.32(d)	Demonstrate facility has adequate fire control systems, water volume and pressure, foaming equipment, automatic sprinklers, etc., if necessary		
PC-21b Testing and Maintenance of Equipment	270.14(a); 264.33	Demonstrate communication, alarm, fire control equipment, spill control equipment, and decontamination equipment are tested and maintained, if applicable..		
PC-22 Documentation of Arrangements with Emergency Agencies	270.14(a); 264.37	Owner/operator must make arrangements, as appropriate, with type of waste and hazard potential, for the potential need for services.		
	270.14(a);	Document refusal to enter into a coordination		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-22a Document Agreement Refusal	264.37(b)	agreement.		
PC-22b Equipment and Power Failure	270.14(b)(8)(iv)	Describe procedure used to mitigate the effects of equipment failure and power outages, if applicable.		
PC-23 Closure Plans	270.14(b)(13); 264.112(a)(1),(2)	Include an approved closure plan consistent with the requirements of 264.112. This plan is included for post-closure facilities as a description of how the facility was closed.		
PC-23a Post-Closure Plan	270.14(b)(13)	Submit a copy of the approved post-closure plan.		
PC-23b Post-Closure Care Contact	270.14(b)(13); 264.118(b)(3)	Provide the name, address, and phone number of the person or office to contact about the hazardous waste disposal unit or facility during the post-closure care period.		
PC-24 Notices Required for Disposal Facilities	270.14(b)(14)	Provide a certification of closure, a survey plat, and a post-closure certification. Also include a statement that the post-closure notices required by 270.149(b)(14) will be filed and submitted appropriately.		
PC-25 Post-Closure Cost Estimate	270.14(b)(16) 264.144	Provide a copy of the most recent post-closure cost estimate, calculated to cover the cost, in current dollars, of post-closure monitoring and maintenance of the facility in accordance with the applicable post-closure plan. Estimate must be based on the third party performing the post-closure activities. The cost estimate must be adjusted annually for inflation pursuant to 264.144(b).		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-25a Financial Assurance Mechanism for Post-Closure Care	270.14(b)(16); 264.145; 264.151	Provide a copy of the established financial assurance mechanism for post-closure care of the facility. The mechanism must be one of the following: trust fund <ul style="list-style-type: none"> • surety bond • letter of credit • insurance • financial test and corporate guarantee for post-closure care • use of multiple financial mechanisms • use of financial mechanism for multiple facilities. 		
PC-25b Use of State-Required Mechanisms	270.14(b)(18); 264.149	When state has regulations that provide equivalent or greater liability requirements for financial assurance for closure post-closure, submit copy of state-required financial mechanism.		
PC-25c State Assumption of Responsibility	270.14(b)(18); 264.150	If state assumes legal responsibility for compliance with closure, post-closure, or liability requirements there must be a letter submitted from the state specifying assumption of responsibilities and amounts of liability coverage assured by state.		
PC-26 Solid Waste Management Units (SWMU)	270.14(d)(1); 264.101	Identify all SWMUs at the facility including hazardous and nonhazardous waste units, as well as active and inactive units, if known.		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
PC-26a Characterize the SWMU	270.14(d)(1)	Submit SWMU information including: type of each unit; location on a topographic map; engineering drawings, if available, dimensions; dates of operation; description of wastes in each unit; and quantity or volume of waste, if known.		
PC-26b No SWMUs		Describe methodology used to determine that no existing or former SWMUs exist at the facility.		
PC-26c Releases	270.14(d)(2)			
PC-26c(1) Characterize Releases	270.14(d)(3)	Provide following information concerning releases: date of release; type, quantity, and nature of release; groundwater monitoring and other analytical data; physical evidence of stressed vegetation; historical evidence of releases; any state, local, or federal enforcement action that may address releases; any public citizen complaints that indicate a release; and any other information showing the migration of the release.		
PC-26c(2) No Releases		Describe methodology used to determine that releases from SWMUs are not present.		
PC-27 Part B Certification	270.11			
PC-28 Information on the Potential for the Public to be Exposed to Releases. At a Minimum, this must include:	270.10(j)	The federal requirement is for surface impoundments and land disposal units.		
<ul style="list-style-type: none"> • reasonably foreseeable 				

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potential releases • potential pathways of human exposure • potential magnitude and nature of exposure				

This section of the checklist contains elements, currently required, that may become optional under the proposed regulation changes in 40 CFR Part 270.

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
<i>PC-30b Emergency Coordinators</i>	270.14(b)(7); 264.52(d); 264.55	<i>There must at least be one primary emergency coordinator available at all times.</i>		
<i>PC-30c Implementation</i>	270.14(b)(7); 264.52(a); 264.56(d)	<i>Emergency coordinator to determine that facility has had a release, fire, or explosion that could threaten human health or the environment outside facility.</i>		
<i>PC-30d Emergency Actions</i>	270.14(b)(7); 264.56			
<i>PC-30d(1) Notification</i>	270.14(b)(7); 264.56(a)	<i>Describe the method for immediate notification of facility personnel and necessary state and local agencies.</i>		
<i>PC-30d(2) Identification of Hazardous Materials</i>	270.14(b)(7); 264.56(b)	<i>Observations, records, manifests, or chemical analysis may be used by emergency coordinator.</i>		
<i>PC-30d(3) Assessment</i>	270.14(b)(7); 264.56(c),(d)	<i>Direct and indirect effects must be considered.</i>		
<i>PC-30d(4) Control Procedures</i>	270.14(b)(7); 264.52(a)	<i>Contingency plan must describe actions facility personnel must take in response to fires, explosions, or any unplanned release of hazardous waste to air, soil, or surface water.</i>		
<i>PC-30d(5) Post-Emergency Equipment Management</i>	270.14(b)(7); 264.56(h)(2)	<i>Decontamination is required for emergency equipment.</i>		
<i>PC-30e Evacuation Plan for Facility Personnel</i>	270.14(b)(7); 264.52(f)	<i>Evacuation plans must include evacuation signals and primary and alternate evacuation routes.</i>		
<i>PC-30f Notification of Federal, State and Local Authorities before</i>	270.14(b)(7); 264.56(i)	<i>Federal or state authorities must be notified within 15 days of occurrence.</i>		

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Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
<i>Resuming Post-Closure Care</i>				
<i>PC-30g Notification Reports</i>	270.14(b)(7); 264.196(d)	<i>Demonstrate that any release to the environment will be reported to regional administrator within 24 hours of detection.</i>		
<i>PC-31 Outline of Introductory and Continuing Training Programs</i>	270.14(b)(12); 264.16(a)(1)	<i>Facility personnel must successfully complete classroom or on-the-job training which will allow them to responsibly perform in their positions for post-closure care. The training program is limited to post-closure activities.</i>		
<i>PC-31a Job Title/Job Description</i>	270.14(b)(12); 264.16(d)1, (d)(2)	<i>Owner or operator must maintain records of job titles, names of employees, job descriptions, and types and amounts of training given to employees.</i>		
<i>PC-31b Description of How Training will be Designed to Meet Actual Job Tasks</i>	270.14(b)(12); 264.16(c),(d) (3)	<i>Training must be conducted by a qualified person; there must also be an annual review of the training.</i>		
<i>PC-31c Training Director</i>	270.14(b)(12); 264.16(a)(2)	<i>Program must be directed by person trained in hazardous waste procedures.</i>		
<i>PC-31d Relevance of Training to Job Position</i>	270.14(b)(12); 264.16(a)(2)	<i>Training must include instruction on hazardous waste procedures relevant to each employee's position.</i>		
<i>PC-31e Training for Emergency Response</i>	270.14(b)(12); 264.16(a)(3)	<i>Personnel must minimally be familiar with emergency procedures, emergency equipment, and emergency systems.</i>		
<i>PC-31f Maintenance of Training Records/Copy of Personnel Training Documents</i>	270.14(b)(12); 264.16(b),(d) (4),(e)	<i>Training records on current personnel must be kept until the post-closure care period is completed. Training must be completed within 6 months after date of employment or assignment to the facility, whichever is later.</i>		

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS				
POST-CLOSURE FACILITY REQUIREMENTS				
Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
<i>PC-32 Chemical and Physical Analyses</i>	<i>270.14(b)(2); 264.13(a)</i>	<i>Data generated by testing the waste, published data on the waste, or data gathered from similar processes may be used.</i>		
<i>PC-33 Waste Analysis Plan</i>	<i>270.14(b)(3); 264.13(b),(c) 266.102(a)(2)(ii); 266.104(a); (2), 268.7</i>	<i>Address how for closed units/facilities, a waste analysis plan is not applicable. Discuss previous waste stream and/or current management of the waste, if applicable. Discuss whether or not leachate or runoff collection and analysis are necessary.</i>		

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.

^c 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.