

STATE OF WASHINGTON  
DANGEROUS WASTE MANAGEMENT PERMIT LITE  
FOR CORRECTIVE ACTION

Department of Ecology  
Northwest Regional Office  
15700 Dayton Avenue North  
Shoreline, Washington 98133-5910

Issued in accordance with the applicable provisions of the Hazardous Waste Management Act in Chapter 70.105 Revised Code of Washington (RCW), and the regulations promulgated thereunder in Chapter 173-303 Washington Administrative Code (WAC).

ISSUED TO:

Burlington Environmental, LLC  
1701 East Alexander Avenue  
Tacoma, WA 98421

**FOR:**

Burlington Environmental, LLC  
734 South Lucile Street  
Seattle, Washington 98108

This Permit Lite (Permit) is effective as of April 6, 2022 (date), and shall remain in effect until April 6, 2032 (date), unless revoked and reissued, modified, or terminated under WAC 173-303-830(3) and (5) or continued in accordance with WAC 173-303-806(7). Upon becoming effective, this Permit replaces Permit No. WAD 000812909 issued by the United States Environmental Protection Agency and the Washington State Department of Ecology on August 5, 1991, and subsequently on June 27, 2010, under which Burlington Environmental, LLC has been continuing to operate pursuant to WAC 173-303-806(7).

ISSUED BY: WASHINGTON STATE DEPARTMENT OF ECOLOGY



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Raman Iyer, Section Manager  
Department of Ecology  
Hazardous Waste and Toxics Reduction Program  
Northwest Regional Office

Date April 6, 2022

## **INTRODUCTION**

PERMITTEE: Burlington Environmental, LLC, a wholly owned subsidiary of PSC  
Environmental Services, LLC which a wholly owned indirect subsidiary of  
Harsco/CleanEarth  
WAD 000812909

Pursuant to Chapter 70.105 RCW, the Hazardous Waste Management Act of 1976, as amended, and regulations codified in Chapter 173-303 WAC, a permit is issued to Burlington Environmental, LLC, a wholly owned subsidiary of PSC Environmental Services, LLC which is a wholly owned indirect subsidiary of Harsco/CleanEarth (hereafter collectively referred to as “Burlington”), to conduct corrective action at the e Georgetown Facility site (Site). The Site consists of: a) the original permitted parcel consisting of approximately two acres located at 734 Lucile Street, Seattle, Washington; b) an unpermitted parcel of approximately four acres (the former Amalgamated Sugar Company or “TASCO” property), located at 5400 Denver Avenue, Seattle, Washington, adjacent and contiguous to the property described in a); and, c) areas where hazardous substances released at the parcels described in a) and b) above have been deposited, stored, disposed of, placed, or otherwise come to be located. Burlington must comply with all conditions of this Permit.

Pursuant to RCW 70.105D.030(1)(d), the Washington State Department of Ecology (Ecology) is designated by the Washington State Legislature to carry out all State programs authorized by the United States Environmental Protection Agency (EPA) pursuant to the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et. seq., as amended. Ecology has authority to issue this Permit in accordance with RCW 70.105.130 and is responsible for enforcement of all conditions of this Permit. Anyone may appeal these permit conditions or decisions by Ecology to the Pollution Control Hearings Board in accordance with WAC 173-303-845.

## **PART I - GENERAL CONDITIONS**

I.1 Burlington shall comply with all requirements of WAC 173-303-810, which are hereby incorporated by reference into this Permit. In addition to the terms stated herein, the corrective action

obligations with respect to the facility contained in Agreed Orders No. DE 7347 (as amended) and DE 10402 (as amended) are enforceable terms of this Permit.

I.2. Modifications to the Orders shall not require a permit modification, except when required by WAC 173-303-830, Appendix I (N)(5) to incorporate a substantial change requiring public comment under WAC 173-340-600. The Orders are not appealable to the Pollution Control Hearings Board. The Orders may be reviewed only as provided under the Model Toxics Control Act (“MTCA”), Chapter 70.105D.060 RCW.

I.3. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under any other state or federal laws governing protection of public health or the environment. However, compliance with the terms of this Permit does constitute a defense to any action alleging failure to comply with the applicable standards upon which this Permit is based.

I.4. Pursuant to WAC 173-303-806(6), Burlington shall submit a new application for a final permit 180 days prior to the expiration date of this Permit, unless Ecology grants a later date provided that such date is not later than the expiration date of the Permit. This Permit and all its conditions will remain in effect beyond the Permit's expiration date until Ecology has made a final permit determination if: (a) the Permittee has submitted a timely application for a final status permit; (b) Ecology determines that the final permit application is complete as set forth in WAC 173-303-840(1)(b); and (c) Ecology has not made a final permit determination as set forth in WAC 173-303-840.

If Burlington fails to comply with the terms and conditions of the expiring or expired permit, then Ecology may take action consistent with WAC 173-303-806(7)(b). If Burlington fails to submit a timely, complete application as required herein, then those permit conditions necessary to protect human health and the environment will remain in effect beyond the Permit's expiration date in accordance with WAC 173-303-815(2)(b)(ii), until Ecology terminates the conditions.

## **PART II - CORRECTIVE ACTION**

II. Ecology is requiring that Burlington fulfill corrective action responsibilities for the facility, as defined by WAC 173-303-040, using the Model Toxics Control Act (MTCA), (Chapter RCW 70.105D), as amended, and its implementing regulations (Chapter 173-340 WAC), and the Dangerous Waste Regulations [(Chapter 173-303 WAC – specifically, WAC 173-303-646]. See Section III.1, *infra*. The actions taken must meet or exceed all substantive corrective action requirements of the Resource Conservation and Recovery Act (RCRA), the state Hazardous Waste Management Act, and the Dangerous Waste Regulations.

Burlington's corrective action obligations with respect to the facility under Orders No. DE 7347, effective May 28, 2010, as amended, and DE 10402, effective April 23, 2014 (the "Orders") are enforceable conditions of this Permit under the authority of Chapter 70.105 RCW, and its implementing regulations, Chapter 173-303 WAC.

## **PART III - CORRECTIVE ACTION CONDITIONS**

III.1. The Orders were issued pursuant to the Model Toxics Control Act (MTCA), Chapter 70.105D RCW, as amended, its implementing regulations, Chapter 173-340 WAC, and the Dangerous Waste Regulations, WAC 173-303-646. The Orders and their attachments are incorporated by reference as fully enforceable under this Permit. Regardless of whether the Orders are vacated, Burlington's corrective action obligations continue to be enforceable conditions of this Permit under the authority of the Hazardous Waste Management Act (HWMA), Chapter 70.105 RCW, and its implementing regulations, Chapter 173-303 WAC.

III.2. The Georgetown Site has been administratively divided into two areas: a) an area east of Fourth Avenue South (the "E-4 Area" or "East of 4<sup>th</sup>"), and b) an area west of Fourth Avenue South (the "W-4 Area" or "West of 4<sup>th</sup> Site"). Ecology has selected a final cleanup remedy for the E-4 Area of the site. The final cleanup remedy for this part of the site is described in the 2010 Order No. DE 7347 and its attached 2010 Cleanup Action Plan, each as amended pursuant to that First Amendment to Agreed Order No. DE 7347 and by the 2015 Cleanup Action Plan Revisions, Consistent with Agreed Order DE 7347 Amendment I (CAP).

III.3. Ecology has named Art Brass Plating, Inc., Blaser Die Casting Co., Capital Industries, and Burlington as Potentially Liable Persons (PLPs) for the West of 4<sup>th</sup> Site. The Agreed Order for the West of 4<sup>th</sup> Site (Agreed Order No. DE 10402) requires the four PLPs to perform a Feasibility Study (FS), prepare a FS Report, and draft a CAP. Order No. DE 10402 addresses Burlington's obligations to conduct a FS and draft a CAP for the W-4 Area of the site for contaminants of concern (COCs) other than 1,4-dioxane. Order No. DE 10402 as amended by that First Amendment to Agreed Order No. 10402, requires the PLPs to conduct certain FS Pilot Studies in areas of groundwater contamination and submit a separate Focused FS Report Addendum for each of Site Unit 1 and Site Unit 2 that comply with applicable requirements of WAC 173-340-350(8)(c), prior to selecting a preferred cleanup action and preparing a draft CAP.

III.4. The presence of 1,4-dioxane-contaminated groundwater in the West of 4<sup>th</sup> Site is due to the migration of contaminated groundwater originating from areas east of 4<sup>th</sup> Avenue South. Remedial actions focused on this COC at both the West of 4<sup>th</sup> Site and areas east of 4<sup>th</sup> Avenue South will be planned and conducted under Order No. DE 7347, as amended.

III.5. When Ecology selects a final cleanup remedy for the entire Site, including the W-4 Area of the Site, this Permit will be modified as needed to include Ecology's selected remedies. At that time, it will incorporate by reference any additional applicable Orders or Consent Decrees, as determined by Ecology, Burlington, and other PLPs (that are responsible for releases of hazardous substances in the W-4 Area of the Burlington Georgetown Site).

**PART B CERTIFICATION**  
**WAC 173-303-806(4)(a); 173-303-810(12)and (13) 40 CFR 270.11**

**CERTIFICATION**

In accordance with 40 CFR 270.11(d) and Washington Dangerous Waste Regulations, WAC 173-303-810(13), the following certification is made in reference to the June 2010 Part B Application for BURLINGTON ENVIRONMENTAL – STERICYCLE GEORGETOWN FACILITY located in Seattle, Washington.

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”



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Gregory J. Fink  
Director EHS  
Burlington Environmental, LLC

March 23, 2022

Date:

## INTRODUCTION

This Application is for a Resource Conservation and Recovery Act (RCRA) Dangerous Waste Permit Lite for corrective action and post-closure requirements at the Burlington Environmental, LLC(Burlington) Georgetown Facility located at 734 South Lucile Street, Seattle Washington 98108.


The existing RCRA Dangerous Waste Permit No. WAD 00081 2909 was issued by the Washington State Department of Ecology (Ecology) in 2010 under the authority of the Dangerous Waste Regulations, Chapter 70.105 RCW, and its implementing regulations, WAC 173-303-646; and, in conjunction with the issuance of Agreed Order No. DE 7347, effective May 28, 2010, and Order No. DE 10402, effective April 23, 2014 pursuant to the Model Toxics Control Act, Chapter 70.105D RCW as amended, and its implementing regulations, Chapter 173-340 WAC.

The Georgetown Facility site (Site) has been administratively divided into two areas: a) an area east of Fourth Avenue South (East of 4<sup>th</sup>), and b) an area west of Fourth Avenue South (West of 4<sup>th</sup>). Ecology has selected a final cleanup remedy for the East of 4<sup>th</sup> area of the Site and is described in Agreed Order No. DE 7347. The Agreed Order for the West of 4<sup>th</sup> (Agreed Order No. DE 10402) requires Burlington and three other potentially liable parties (PLPs) to perform a Feasibility Study (FS), prepare a FS Report, and draft Cleanup Action Plan (CAP). Order No. DE 10402 addresses Burlington's obligations to conduct a FS and draft a CAP for the West of 4<sup>th</sup> area of the Site for contaminants of concern, including, but not limited to 1,4-dioxane.

At such time as Ecology selects a final cleanup remedy for the entire Site, including the West of 4<sup>th</sup> area, the Georgetown Facility Permit will be modified as needed to include Ecology's selected remedy(ies). At that time, the Permit will incorporate by reference applicable Orders or Consent Decrees, as determined by Ecology, Burlington-PSC, and other PLPs, as applicable, for the release of hazardous substances in the West of 4<sup>th</sup> area of the Site.

**This Burlington Georgetown RCRA/DW Permit Lite includes the following:**

- 1. SECTION A – PART A FORMS**
- 2. SECTION B – CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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**1. Reason for Submittal** (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, $> 1$ kg of acute hazardous waste, or $> 100$ kg of acute hazardous waste spill cleanup in <b>one or more months of the reporting year</b> (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A Form

**2. Site EPA ID Number**

W	A	D	0	0	0	8	1	2	9	0	9
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**3. Site Name**

<b>Burlington Environmental, LLC - Georgetown Facility</b>
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**4. Site Location Address**

Street Address	<b>734 South Lucile Street</b>		
City, Town, or Village	<b>Seattle</b>	County	<b>King</b>
State	<b>WA</b>	Country	<b>USA</b>
		Zip Code	<b>98101</b>

**5. Site Mailing Address**

Same as Location Address

Street Address	<b>1701 E. Alexander Avenue</b>		
City, Town, or Village	<b>Tacoma</b>		
State	<b>WA</b>	Country	<b>USA</b>
		Zip Code	<b>98421</b>

**6. Site Land Type**

<input checked="" type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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**7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)**

A. (Primary) <b>332813</b>	C.
B.	D.



## 8. Site Contact Information

 Same as Location Address

First Name	<b>Greg</b>	MI	<b>J</b>	Last Name	<b>Fink</b>
Title	<b>Director of EHS - SES</b>				
Street Address	<b>2337 North Penn Road</b>				
City, Town, or Village	<b>Hatfield</b>				
State	<b>PA</b>	Country	<b>USA</b>	Zip Code	<b>19440</b>
Email	<b>gfink@harsco.com</b>				
Phone	<b>215-822-2676</b>	Ext	<b>N/A</b>	Fax	

## 9. Legal Owner and Operator of the Site

## A. Name of Site's Legal Owner

 Same as Location Address

Full Name	<b>Burlington Environmental, LLC</b>	Date Became Owner (mm/dd/yyyy)	<b>8/1/1970</b>
Owner Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
Street Address	<b>734 South Lucile Street</b>		
City, Town, or Village	<b>Seattle</b>		
State	<b>WA</b>	Country	<b>USA</b>
Zip Code	<b>98101</b>		
Email	<b>gfink@harsco.com</b>		
Phone	<b>215-822-2676</b>	Ext	
Fax			
Comments	<b>Burlington Environmental LLC is a wholly-owned subsidiary of PSC Environmental Services LLC, which is a wholly-owned indirect subsidiary of Harsco/CleanEarth.</b>		

## B. Name of Site's Legal Operator

 Same as Location Address

Full Name	<b>Burlington Environmental, LLC*</b>	Date Became Operator (mm/dd/yyyy)	<b>2/6/2020</b>
Operator Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
Street Address	<b>1701 E. Alexander Avenue</b>		
City, Town, or Village	<b>Tacoma</b>		
State	<b>WA</b>	Country	<b>USA</b>
Zip Code	<b>98421</b>		
Email	<b>gfink@harsco.com</b>		
Phone	<b>215-822-2676</b>	Ext	
Fax			
Comments	<b>* The "Full Name" field is too small to fit the full legal name which is "Burlington Environmental, LLC, a Clean Earth Environmental Solutions, Inc. company"</b>		

**10. Type of Regulated Waste Activity (at your site)**

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
<input type="checkbox"/>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>	
<input type="checkbox"/> Y <input type="checkbox"/> N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5 Recycler of Hazardous Waste	
<input type="checkbox"/>	a. Recycler who stores prior to recycling	
<input type="checkbox"/>	b. Recycler who does not store prior to recycling	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption	
<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption	

**B. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

N/A						

**C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes.** Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

N/A						

**11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)****A. Other Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

**B. Universal Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input type="checkbox"/>	c. Mercury containing equipment
<input type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Other (specify) _____
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

**D. Pharmaceutical Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Operating under 40 CFR 266 Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Withdrawing from operating under 40 CFR 266 Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is no longer an LQG or SQG.

**12. Eligible Academic Entities with Laboratories**—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

**13. Episodic Generation**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator?
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**14. LQG Consolidation of VSQG Hazardous Waste**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
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**15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/>	1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
<input type="checkbox"/>	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

**16. Notification of Hazardous Secondary Material (HSM) Activity**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
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**17. Electronic Manifest Broker**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
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**18. Comments** (include item number for each comment)

**19. Certification** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy) <b>4/1/2021</b>
Printed Name (First, Middle Initial Last) <b>Greg J. Fink</b>	Title <b>Director EHS</b>
Email <b>gfink@harsco.com</b>	
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

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

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS				
SECTION P. POST-CLOSURE FACILITY REQUIREMENTS				
Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-1	General Part A Information Requirements	(Section A)	Attached	
P-1a	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)	(A-1)	*
P-1b	Name, Mailing Address, and Location of Facility for which the Application is Submitted, including a Topographic Map	270.13(b),(l)	(A-2)	*
P-1c	Up to four Standard Industrial Classification Codes which Best Reflect the Products or Services Provided by the Facility	270.13(c)	(A-3)	*
P-1d	Operator/Owner's Name, Address, Telephone Number, and Ownership Status	270.13(d),(e)	(A-4) Ownership status must include status as federal, state, private, public, or other entity.	*

\*Reference the Burlington Environmental PSC – Georgetown Facility 2010 Dangerous Waste Permit effective June 27, 2010 and Burlington Environmental-PSC Agreed Order DE 7347 and its attached Cleanup Action Plan for "East of 4<sup>th</sup> Avenue"; and, subsequent modified Georgetown Facility Dangerous Waste Permit and new Agreed Order No. DE 10402, effective June 27, 2014 for the "West of 4<sup>th</sup> Avenue" for which a RI/FS is in progress and a final cleanup action plan is not yet final.

**CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS**

**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-1e Facility is New, Existing, or Located on Indian Lands	270.13(f),(g)	(A-5) Description must include information on whether this is a first or revised application with date of last signed permit application.	*	
P-1f Description of Processes to be Used for Treating, Storing, and Disposing of Hazardous Waste	270.13(i)	(A-6) Description must include design capacity for these items.	N/A	
P-1g Specification of the Hazardous Wastes Listed or Designated Under 261	270.13(j)	(A-7) Specifications must include estimate on quantity of waste to be treated, stored, or disposed of.	N/A	
P-1h Listing of all Permits or Construction Approvals Received or Applied for	270.13(k)	(A-8) 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.	N/A	
P-2 Part B General Description	270.14(b)(1)	(Section B)	*	
P-3 General Requirements	270.14	(B-1)	*	

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-3a Topographic Map	270.14(b)(19)	(B-2a) 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.	*	
Scale and Date	270.14(b)(19)(i)	Other scales may be used if justified.	*	
The 100-Year Flood Plain Area	270.14(b)(19)(ii)		*	
Surface Waters	270.14(b)(19)(iii)		*	
Surrounding Land Use	270.14(b)(19)(iv)		*	
Wind Rose	270.14(b)(19)(v)		*	
Map Orientation	270.14(b)(19)(vi)		*	
Legal Boundaries	270.14(b)(19)(vii)		*	
Access Control	270.14(b)(19)(viii)		*	
Injection and Withdrawal Wells (on site and off site)	270.14(b)(19)(ix)		*	
Buildings and Other Structures	270.14(b)(19)(x)		*	
Drainage and Flood Control Barriers	270.14(b)(19)(xi)		*	
P-3b Additional Information on the Topographic Map for Land Disposal Facilities	270.14(c)(3)	(B-2b)	N/A	
Uppermost Aquifer and Hydraulically Connected Aquifers Beneath Facility Property	270.14(c)(2)		*	



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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
Groundwater Flow Direction	270.14(c)(2)		*	
Waste Management Areas	270.14(c)(3)		N/A	
Property Boundaries	270.14(c)(3)		*	
Location of Groundwater Monitoring Wells	270.14(c)(3); 264.97		*	
Extent of any Groundwater Contaminant Plume	270.14(c)(4)(i)		*	
P-3c Facility Location Information	270.14(b)(11); 264.18	(B-3)	*	
P-3c(1) Political Jurisdiction in which Facility is Located	270.14(b)(11)(i)	(B-3a)	*	
P-3c(2) Flood Plain Requirements	270.14(b)(11)(iii), (iv); 264.18(b)	(B-3b) Flood plain requirements applicable if facility is located in 100-year flood plain.	*	
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.	*	
Concentration of Hazardous Constituents Remaining in the Unit that Would Potentially Affect Surface Waters as a Result of Washout	270.14(b)(11); 264.18(b)(ii)(B)	Flood plain requirements applicable if facility is located in 100-year flood plain.	*	
Impact of such Concentration on Current or Potential uses of, and Water Quality Standards Established for, the Affected Surface Waters	270.14(b)(11); 264.18(b)(ii)(C)	Flood plain requirements applicable if facility is located in 100-year flood plain.	*	

## CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS

## SECTION P. POST-CLOSURE FACILITY REQUIREMENTS

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
Impact of Hazardous Constituents on the Sediments of Affected Surface Waters, or the Soils of the 100-Year Flood Plain, that could Result from Washout	270.14(b)(11); 264.18(b)(ii)(D)	Flood plain requirements applicable if facility is located in 100-year flood plain.	*	
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).	*	
<i>P-4a Chemical and Physical Analyses</i>	<i>270.14(b)(2); 264.13(a)</i>	<i>(C-1) Data generated by testing the waste, published data on the waste, or data gathered from similar processes may be used.</i>	<i>N/A</i>	
<i>P-4b 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>(C-2) 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>	<i>N/A</i>	
P-5 General Hydrogeologic Information	270.14(c)(2)	(E-3) Include description of the regional and site-specific geologic and hydrogeological setting.	*	
P-5a Topographic Map Requirements	270.14(c)(2), (3), (4)(i)	(E-4)	*	
P-5b Contaminant Plume Description	270.14(c)(2), (4), (7); Part 261,	(E-5) In some cases, contaminant plumes may be defined under groundwater quality	*	

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
	Appendix VIII	assessment programs carried out during the interim status period which may not address the complete list of Appendix VIII 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.	*	
P-5c General Monitoring Program Requirements	270.14(c)(5); 264.90(b)(4); 264.97	(E-6) Describe the monitoring to be conducted during the post-closure care period, including as applicable, the procedures for conducting the following operations and evaluating the data gathered: groundwater monitoring; and leachate collection/detection and removal.	*	
P-5d Description of Wells	270.14(c)(6)(ii); 264.97(a), (b), (c)	(E-6a) Identify the number, location, and depth of each well, and describe the well construction materials to be used.	*	
P-5e Proposed Sampling and Statistical Analysis Procedures for Groundwater Data	270.14(c)(7)(vi); 264.97(d), (e), (f); 264.99(c) - (g)	(E-6b)	*	
P-5f Corrective Action Program	270.14(c)(8); 264.99(j); 264.100	(E-a) 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.	*	

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<b>Section and Requirement</b>	<b>Federal Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
P-5g Characterization of Contaminated Groundwater	270.14(c)(8)(i)	(E-9a) 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.	*	
P-5h Concentration Limits	270.14(c)(8)(ii); 264.94; 264.100(a)(2)	(E-9b) Specify the proposed concentration limits for each hazardous constituent in groundwater.	*	
P-5i Alternate Concentration Limits	270.14(c)(8)(ii); 264.94(b); 264.100(a)(2)	(E-9c) Provide a justification for establishing alternate concentration limits. This justification must address each of the following two factors.	N/A	
P-5j Corrective Action Plan	270.14(c)(8)(iii); 264.100(b); 264.101	(E-9d) Provide detailed plans on the corrective actions proposed for the facility, including maps of engineered structures, construction details, plans for removing waste, description of treatment technologies, effectiveness of correction program, operation and maintenance plans, closure and post-closure plans, and a schedule for corrective action requirements. Also, include plan for corrective action at solid waste management units (SWMU).	*	
P-6 Security	270.14(b)(4);	(F-1) Indicate whether hazardous waste	N/A	

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
	264.14	remains exposed after completion of partial or final closure or access by the public or domestic livestock may pose a hazard to human health. Demonstrate that this type of property post-closure use must never be allowed to disturb 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.		
P-6a Security Procedures and Equipment	270.14(b)(4); 264.14	(F-1a) Unless waiver is granted, facility must have surveillance system or barrier or other means to control entry.	N/A	
P-6a(1) Warning Signs	270.14(b)(4); 264.14(c)	(F-1a(3)) Signs in English must be posted at each entrance, and be legible from 25 feet.	N/A	
P-6b Inspection Schedule	270.14(b)(5); 264.15	(F-2) Include where applicable, as part of the post-closure inspection schedule, specific requirements for each type of treatment, storage, and disposal facility. These specific requirements and the schedule should be included as part of the post-closure plan.	N/A	
P-6b(1) General Inspection Requirements	270.14(b)(5); 264.15(a), (b); 264.33	(F-2a) 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	N/A	

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
		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.		
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.	N/A	
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.	N/A	
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.	N/A	
Inspection Log	264.15(d)	Provide example log or summary. Should be included as part of the post-closure plan.	N/A	
P-7a	Waiver or Documentation of Preparedness and Prevention Requirements	270.14(b)(6) 264.32(a) - (d)	(F-3) Facility must submit justification for any waiver to requirements of this section.	N/A
P-7b	Emergency Equipment	270.14(a); 264.32(c)	(F-3(a)(3)) Demonstrate that portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment are available.	N/A

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## SECTION P. POST-CLOSURE FACILITY REQUIREMENTS

Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-7c Water and Fire Control	270.14(a); 264.32(d)	(F-3(a)(4)) Demonstrate facility has adequate fire control systems, water volume and pressure, foaming equipment, automatic sprinklers, etc.	N/A	
P-7d Testing and Maintenance of Equipment	270.14(a); 264.33	(F-3(a)(5)) Demonstrate communication, alarm, fire control equipment, spill control equipment, and decontamination equipment are tested and maintained.	N/A	
P-7e Documentation of Arrangements with Emergency Agencies	270.14(a); 264.37	(F-3(c)) Owner/operator must make arrangements, as appropriate, with type of waste and hazard potential, for the potential need for services.	N/A	
P-7f Document Agreement Refusal	270.14(a); 264.37(b)	(F-3(c)(4)) Document refusal to enter into a coordination agreement.	N/A	
P-7g Equipment and Power Failure	270.14(b)(8) (iv)	(F-4(d)) Describe procedure used to mitigate the effects of equipment failure and power outages.	N/A	
P-8 <i>Contingency Plan General Information</i>	270.14(b)(7); 264.52	<i>(G-1) Provide facility name and location, operator, site plan, and describe facility operations.</i>	N/A	
<i>Actions to Take in Case of Emergency</i>	270.14(b)(7); 264.52(a)	<i>(G-4(d)) Describe actions to be taken in response to any unplanned release of hazardous waste to air, soil, or surface water.</i>	N/A	
P-8a <i>Emergency Coordinators</i>	270.14(b)(7); 264.52(d);	<i>(G-2) There must at least be one primary emergency coordinator available at all</i>	N/A	

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Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
	264.55	times.		
P-8b Implementation	270.14(b)(7); 264.52(a); 264.56(d)	(G-3) Emergency coordinator to determine that facility has had a release, fire, or explosion that could threaten human health or the environment outside facility.	N/A	
P-8c Emergency Actions	270.14(b)(7); 264.56	(G-4)	N/A	
P-8c(1) Notification	270.14(b)(7); 264.56(a)	(G-4a) Describe the method for immediate notification of facility personnel and necessary state and local agencies.	N/A	
P-8c(2) Identification of Hazardous Materials	270.14(b)(7); 264.56(b)	(G-4b) Observation, records or manifest, or chemical analysis may be used by emergency coordinator.	N/A	
P-8c(3) Assessment	270.14(b)(7); 264.56(c), (d)	(G-4c) Direct and indirect effects must be considered.	N/A	
P-8c(4) Control Procedures	270.14(b)(7); 264.52(a)	(G-4d) 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.	N/A	
P-8c(5) Storage, Treatment, and Disposal of Released Material	270.14(b)(7); 264.56(g)	(G-4f) After emergency, emergency coordinator must provide for treating, storing, and disposing of recovered waste.	N/A	
P-8c(6) Incompatible Waste	270.14(b)(7); 264.56(h)(1)	(G-4g) Until cleanup is complete, assure that incompatible waste is not stored together.	N/A	



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Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
<i>P-8c(7) Post-Emergency Equipment Management</i>	270.14(b)(7); 264.56(h)(2)	<i>(G-4h) Decontamination is required for emergency equipment.</i>	N/A	
<i>P-8d 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>	N/A	
<i>P-8e Notification of federal, State and Local Authorities before Resuming Post-Closure Care</i>	270.14(b)(7); 264.56(i)	<i>Federal or state authorities must be notified within 15 days of occurrence.</i>	N/A	
<i>P-8f 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>	N/A	
<i>P-9 Outline of Introductory and Continuing Training Programs</i>	270.14(b)(12); 264.16(a)(1)	<i>(H-1) 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>	N/A	
<i>P-9a Job Title/Job Description</i>	270.14(b)(12); 264.16(d)1, (d)(2)	<i>(H-1a) Owner or operator must maintain records of job titles, names of employees, job descriptions, and types and amounts of training given to employees.</i>	N/A	
<i>P-9b Description of How Training will be Designed to Meet Actual Job Tasks</i>	270.14(b)(12); 264.16(c),(d) (3)	<i>(H-1b) Training must be conducted by a qualified person; there must also be an annual review of the training.</i>	N/A	
<i>P-9c Training Director</i>	270.14(b)(12); 264.16(a)(2)	<i>(H-1c) Program must be directed by person trained in hazardous waste procedures.</i>	N/A	

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<b>Section and Requirement</b>	<b>Federal Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
P-9d <i>Relevance of Training to Job Position</i>	270.14(b)(12); 264.16(a)(2)	(H-1d) Training must include instruction on hazardous waste procedures relevant to each employee's position.	N/A	
P-9e <i>Training for Emergency Response</i>	270.14(b)(12); 264.16(a)(3)	(H-1e) Personnel must minimally be familiar with emergency procedures, emergency equipment, and emergency systems.	N/A	
P-9f <i>Maintenance of Training Records/Copy of Personnel Training Documents</i>	270.14(b)(12); 264.16(b),(d) (4),(e)	(H-1f) 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.	N/A	
P-10 Closure Plans	270.14(b)(13); 264.112(a)(1),(2)	(I-1) 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.	N/A	
P-11 Post-Closure Plan	270.14(b)(13)	(I-2) Submit a copy of the approved post-closure plan.	N/A	
P-11a Post-Closure Care Contact	270.14(b)(13); 264.118(b)(3)	(I-2g) 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.	N/A	
P-12 Notices Required for Disposal Facilities	270.14(b)(14)	(I-3a through d) Provide a certification of closure, a survey plat, and a post-closure	N/A	

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Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
		certification. Also include a statement that the post-closure notices required by 270.149(b)(14) will be filed and submitted appropriately.	N/A	
P-13 Post-Closure Cost Estimate	270.14(b)(16) 264.144	(I-6) 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 third party performing the post-closure activities. The cost estimate must be adjusted annually for inflation pursuant to 264.144(b).	N/A	
P-14 Financial Assurance Mechanism for Post-Closure Care	270.14(b)(16); 264.145; 264.151	(I-7) 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 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.	*	
P-15 Use of State Required Mechanisms	270.14(b)(18);	(I-9) When state has regulations equivalent	*	

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Section and Requirement	Federal Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
	264.149	or greater liability requirements for financial assurance for closure post-closure submit copy of state-required financial mechanism.	*	
P-16 State Assumption of Responsibility	270.14(b)(18); 264.150	(I-9b) If state assumes legal responsibility for compliance with closure, post-closure, or liability requirements there must be a letter submitted from state specifying assumption of responsibilities and amounts of liability coverage assured by state.	N/A	
P-17 SWMUs	270.14(d)(1); 264.101	(J-1) Identify all SWMUs at the facility including hazardous and nonhazardous waste units, as well as active and inactive units, if known.	*	
P-17a Characterize the SWMU	270.14(d)(1)	(J-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.	*	
P-17b No SWMUs		(J-1) Describe methodology used to determine that no existing or former SWMUs exist at the facility.	N/A	
P-17c Releases	270.14(d)(2)	(J-2)	*	
P-17c(1) Characterize Releases	270.14(d)(3)	(J-2) Provide following information concerning releases: date of release; type, quantity, and nature of release;	*	

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		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.		
P-17c(2) No Releases		(J-1) Describe methodology used to determine that releases from SWMUs are not present.	N/A	
P-18 Part B Certification	270.11	(L-1)	Attached	
P-19 Information on the Potential for the Public to be Exposed to Releases. At a Minimum, this must include:  reasonably foreseeable potential releases  potential pathways of human exposure  potential magnitude and nature of exposure	270.10(j)	(Q-1) The federal requirement is for surface impoundments and land disposal units.	*	

Notes:

- <sup>a</sup> Considerations in addition to the requirements presented in the regulations.
- <sup>b</sup> 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.
- <sup>c</sup> 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.