

U. S. Department of Energy



Consolidated Audit Program Treatment, Storage and Disposal Facilities

Checklist 4 Environmental Compliance and Permitting

Revision 1.2
November 30, 2007

Audit ID:

Date:

Audit ID: _____ TSDF: _____ Auditor: _____

Prepared by: Todd Hardt

Approved by: *Carolynne Thomas*

Areas of Review During Audit

_____ RCRA	_____ TSCA	_____ Financial Assurance
_____ General Compliance	_____ Clean Air Act	_____ SARA/EPCRA
_____ Landfill	_____ Clean Water Act	_____ Environmental Monitoring
_____ Incineration	_____ CERCLA	_____ Agency Review
_____ Corrective Action		
_____ Air Emission		
_____ Permit Specific Information		

A = Acceptable

NA = Not Applicable

F = Finding

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Referenced regulations are accessible at the following URLs:

- <https://doecap.oro.doe.gov>
- <http://www.access.gpo.gov/nara/cfr/cfr-table-search.html#page1>

NOTE:

- When audit findings are written against *site-specific documents* (i.e., SOPs, QA Plans, licenses, permits, etc.), a *copy* of the *pertinent requirement text* from that document *must* be attached to this checklist for retention in DOECAP files.

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Item Number	Lines of Inquiry	Status	Response/Comment
1.0	RCRA Compliance		
1.1	<i>General Compliance</i>		
1.1.1	The facility has an EPA identification number and is operating a permitted treatment, storage or disposal facility. <i>40 CFR 264.11</i>		
1.1.2	The facility has a system in place to prevent the unknowing entry and minimize the possibility for unauthorized entry of persons or livestock onto the active portion of the facility. Postings and signage are appropriate as per the facility permit. <i>40 CFR 264.14</i>		
1.1.3	The facility has a documented inspection program that meets regulatory requirements and includes: <ul style="list-style-type: none"> • A written site inspection plan and schedule covering all waste handling and storage areas; • inspections are documented; • records are kept for at least 3 years (or per permit requirements); • a system is in place to ensure that deficiencies identified during inspections and are tracked through completion of corrective actions. Show date of last inspection and detail findings (if any). <i>40 CFR 264.15, 264.175, 264.195 and NQA-1</i>		

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1.1.4	<p>A job title and written description for each position at the facility was available for review in addition to a description of required training. There is a written training plan which includes job descriptions, training requirements for each job, and names of personnel filling those jobs. The facility maintains records documenting all training (retention time is 3 years for former employees, until closure for current employees). All personnel records reviewed have evidence of training within six months of employment. Annual training was also documented.</p> <p><i>40 CFR 264.16</i></p>		
1.1.5	<p>The facility has a documented RCRA training program that addresses emergency equipment, key parameters for automatic waste feed cut-off systems, communication or alarm systems, response to fire and explosions, response to ground-water contamination incidents and shutdown of operations.</p> <p><i>40 CFR 264.16</i></p>		
1.1.6	<p>The facility has a current Contingency Plan in place and has documented arrangements with local authorities. Describe any Contingency Plan implementations during the past 12 months.</p> <p><i>40 CFR 264.30-264.37</i></p>		
1.1.7	<p>Emergency equipment tested and maintained to ensure proper operation; appropriate systems are in place to familiarize site personnel and off-site responders, and emergency coordinators have appropriate knowledge and authority to meet the requirements of 264-56?</p> <p><i>40 CFR 264.30-264.37, 264.56</i></p>		

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1.1.8	<p>The facility has a documented operating record that contains the following:</p> <ul style="list-style-type: none"> • A written operating record maintained at the facility, containing description and quantity of each hazardous waste received and method(s) and date(s) of its treatment, storage, or disposal at the facility? • the locations of the wastes on hand recorded on a map or diagram of each cell or disposal area? • waste analyses and determinations for both site generated and customer waste; • incident summaries (if contingency plan was implemented); • inspection results; • monitoring, testing and analytical data and corrective actions if applicable; • closure cost estimates. • written records exist for analyses performed, analytical data as required, notices of land disposal restriction, demonstrations of compliance for land restricted wastes, and inspection reports? • annual waste minimization certification <p>These records are immediately available for inspection. The records are retained for at least the life of the facility, exception for records of results of inspections which must only be maintained three years.</p> <p><i>40 CFR 264.73, 264.74</i></p>		

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1.1.9	Facility submitted all regulatory reports on time including: <ul style="list-style-type: none"> • Annual report; • Biennial report; • Unmanifested waste report; • Releases, fires and explosion; • specific reports <i>40 CFR 264.75, 264.76, 264.77, RCRA Permit</i>		
1.1.10	Has the facility had any releases from solid waste management units? If so, explain. <i>40 CFR 264.90</i>		
1.1.11	The facility has a container management program in place that ensures waste is stored in good condition, compatible with the waste container, and all containers are closed unless waste is being added or removed. Waste storage areas have an adequate containment system. <i>40 CFR 264.174</i>		
1.1.12	RCRA-permitted units are maintained in compliance with the permit, including labeling, aisle spacing, inspections, monitoring, leak detection, reporting and recordkeeping, emergency planning and preparedness, training, and financial assurance. <i>40 CFR 264.175</i>		

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1.1.13	RCRA satellite and 90-day areas meet the conditions for permit exemption, including inspections, time, location, and quantity limitations, closed containers, and labeling. <i>40 CFR 262.34</i>		
1.1.14	The facility utilizes permitted tanks for waste storage. IF so, tank integrity tests are performed and documented. Any deficiencies are immediately repaired or the tank removed from services. All tanks are located within secondary containment. <i>40 CFR 264.192 and 264.193</i>		
1.1.15	Does facility ship hazardous waste to other TSDs? If so, the facility has a documented program to ensure that the other TSDs manage hazardous waste in compliance with appropriate RCRA regulations?		
1.2	<i>Landfills</i>		
1.2.1	Landfill design is consistent with permit application and consists of a liner that is designed, constructed and installed to prevent any migration of waste outside of the landfill. Approval has been received from the Regional Administrator of EPA for continued operation? <i>40 CFR 264.301</i>		
1.2.2	Landfill includes a leachate collection and removal system immediately above the liner. <i>40 CFR 264.301</i>		

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1.2.3	The facility records the amount of liquid removed from each leak detection system on a weekly basis, or on a monthly basis if the final cover has been applied. <i>40 CFR 264.309</i>		
1.2.4	The landfill is inspected weekly and after every storm to detect evidence of any of the following: <ul style="list-style-type: none"> • Deterioration, malfunctions, or in proper run-on, run-off control systems • Proper functioning of wind dispersal systems where present • Presence of leachate in and proper functioning of leachate collection and removal systems where present <i>40 CFR 264.304</i>		
1.2.5	The facility is maintaining a map that shows the exact location and dimension, including depth, of each cell; the contents of each cell; and the appropriate location of each hazardous waste within the cell. <i>40 CFR 264.309</i>		
1.2.6	Facility is in compliance with any additional requirements outlined in the facility RCRA Part B Permit. <i>RCRA B Permit</i>		

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1.3	<i>Permitted Incinerators/ Thermal Burners</i>		
1.3.1	<ul style="list-style-type: none"> • Facility burns only wastes authorized in permit and under operating conditions specific in permit. • Adequate waste analyses performed to verify permitted waste feed amounts are within permit limits. <p>If EPA Hazardous Waste Number F020 through F023, F026, or F027 is incinerated verify that DRE of 99.0000% is achieved and the regulatory agency is notified of the intent to burn. Otherwise verify DRE of four nines.</p> <p><i>40 CFR 264.30 (a) through 264.340 (c) and 264.341 through 264.344(a), 264.345 and 264.347, and as approved in permit.</i></p>		
1.3.2	<p>Verify incinerator emission limits:</p> <p>If HCl emissions exceed 1.8 kg/hr (4 lb/h), the emissions are controlled so that the rate of emission is no greater than the larger of eight 1.8 kg/hr (4 lb/h) or 1% HCl in the stack gas prior to entering any pollution control equipment.</p> <p>Verify that particulate matter no greater than 180mg/dsm³ is permitted.</p> <p><i>40 CFR 264.343(b) and 264.343(c)</i></p>		

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1.3.3	<p>Monitoring while incinerating RCRA waste is conducted at least at the intervals specified below, unless permit specific alternative parameter and interval. Then check permit requirements:</p> <ul style="list-style-type: none"> • Waste feed rate, combustion temperature, specified indicator of combustion gas velocity, & CO monitored continuously; • The incinerator and associated equipment for leaks, spills, etc. daily; • The emergency waste feed cutoff systems and associated emergency cutoff alarms: weekly; and, • Any other monitoring required in the permit is conducted. <p>Verify that monitoring and inspection data are recorded and the records placed in the Operating log.</p> <p><i>40 CFR 264.347</i></p>		
1.3.4	Describe the number and type of permit exceedances in the past three years.		
1.4	<i>Corrective Actions</i>		
1.4.1	Is the facility operating under any Consent Orders or Agency agreements? If so, describe.		
1.4.2	Is the facility operating under any Corrective Actions for solid Waste Management Units? IF so, describe.		<p><i>40 CFR 264.522</i></p>

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1.5	<i>Air Emissions</i>		
1.5.1	Is the facility regulated under Subpart AA, BB, CC, DD, or EE? If so, describe status of compliant program. <i>40 CFR 264.1030, 264.1050, 264.1080, 264.1100, 264.1200</i>		
1.6	<i>Permit Specific Requirements</i>		
1.6.1	Does the facility have any permit specific requirements not outlined in the regulations? If so, explain the requirements, status of compliance, permit expiration date and renewal status. <i>RCRA Part B Permit</i>		

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2.0	TSCA		
2.1	Does the facility accept, store and/or treat TSCA regulated material? <i>40 CFR 761.70-761.75</i>		
2.2	TSCA permitted units are maintained in compliance with the permit, including aisle spacing, inspections, labeling, and marking reporting and recordkeeping? <i>40 CFR 761.40, 761.65, Operating Permit</i>		
2.3	Facility is in compliance with disposal requirements outlined in their permit. <i>40 CFR 761.60, Operating Permit</i>		
2.4	When shipping DOE Bulk Product Waste to an offsite facility, the Company has provided appropriate notifications to receiving Subtitle D landfill facilities. <i>40 CFR 761.62</i>		
2.5	If the facility is using an independent transporter to transport PCB waste, confirmation of receipt is documented. <i>40 CFR 761.208</i>		
2.6	All PCB waste has been treated and disposed within 365 days from date it was determined PCB waste? <i>40 CFR 761.208</i>		

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2.7	<p>The PCB storage area meets the following five requirements:</p> <ul style="list-style-type: none"> • Adequate roof and wall to prevent rainwater from reaching the stored PCBs and PCB items; • Adequate curbing with 6" height to contain 2.5x largest internal volume of 25% of total internal volume of all containers; • No drains or structures to permit flow of liquids from curbed areas, • Floors and curbing are Portland cement or continuous smooth, non-porous surface and • Not located on site within the 100-year floodplain. <p><i>40 CFR 761.65</i></p>		
2.8	<p>The facility has a container management program in place that ensures waste is stored in good condition, compatible with the waste container, and all containers are closed unless waste is being added or removed. Waste storage areas have an adequate containment system.</p> <p><i>40 CFR 761.65, BMP</i></p>		
2.9	<p>PCB items in storage are dated with the date removed from service and are managed such that PCB items can be located by this date.</p> <p><i>40 CFR 761.165</i></p>		

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2.10	Chemical Waste Landfills used to dispose of TSCA regulated wastes are operating in compliance with permit and regulatory requirements. <i>40 CFR 761.75</i>		
2.11	Facility has a SOP to address PCB Spill Cleanup compliant with regulatory requirements. If there been onsite releases or releases from any solid waste management unit, they have been handled according to the SOP. <i>40 CFR 761.125</i>		
2.12	The facility has prepared the Annual Document Log and the reports are readily available for review. Procedure is in place for records retention of at least 20 years after the chemical waste landfill is no longer used. <i>40 CFR 761.210</i>		
2.13	Has the facility submitted any manifest discrepancy reports to the Agency for DOE waste? <i>40 CFR 761.210</i>		

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3.0	Clean Air Act		
3.1	Is the facility a CAA Title V major source for criteria air pollutants?		
3.2	Review facility operations and applicability to State air regulations. Does the facility have air permits for required operations? Review compliance with permit conditions. <i>State Regulations</i>		
3.3	Is the facility subject Risk Management Plan requirements? What system is used to monitor the facility's applicability to RMP requirements? <i>40 CFR 68.10</i>		

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3.4	<p>Is the facility subject to NESHAP requirements?</p> <ul style="list-style-type: none"> • Beryllium NESHAP applicability? If so, does the facility have a compliant monitoring and documentation program? (40 CFR 61.30) • Benzene Waste Operations NESHAP? Is an adequate program in place to evaluate the facility's applicability or compliance with the standard? (40 CFR 61.340) • Off-Site Waste and Recovery Operations NESHAP applicability? Is an adequate program in place to evaluate the facility's applicability or compliance? (40 CFR 63.680) • Active Waste Disposal (ACM) applicability? Is an adequate program in place to evaluate the facility's applicability or compliance? (40 CFR 61.154) • Mercury NESHAP applicability? Is an adequate program in place to evaluate the facility's applicability of compliance? (40 CFR 61.50) • Radionuclide Emissions from Federal Facilities Other Than Nuclear Regulatory commission Licensees and Not Covered by Subpart H applicability? Is an adequate program in place to evaluate the facility's applicability or compliance? (40 CFR 61.100) • Hazardous Waste Combustor MACT applicability? Is an adequate program in place to evaluate the facility's applicability or compliance? (40 CFR 63.1200) 		

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4.0	Clean Water Act		
4.1	Does the facility have a NPDES permit? Is the monitoring and reporting in compliance with permit conditions? Note any exceedances and reasons over the last three years. <i>40 CFR 122.1</i>		
4.2	Does the facility discharge to the sanitary sewer system? If so, are there any reported discharge violations? <i>40 CFR 122.50</i>		
4.3	If facility has a NPDES Permit, do they discharge any of the following toxic pollutants? <ul style="list-style-type: none"> • Aldrin/dieldrin (40 CFR 129.100) • DDT/DDD/DDE (40 CFR 129.101) • Endrin (40 CFR 129.102) • Toxaphene (40 CFR 129.103) • Benzidene (40 CFR 129.104) • PCBs (40 CFR 129.105) 		
4.4	Does the facility have a current Storm water Runoff Permit and storm water pollution plan? Verify plan has been implemented and is current. <i>40 CFR 112.1</i>		

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4.5	Does the facility have above ground storage of oils in excess of 1,320 gallons or a single container in excess of 660 gallons? Do they have underground storage of 42,000 gallons? <i>40 CFR 112.1</i>		
4.6	All bulk storage tanks have secondary containment for the entire contents of tank plus freeboard for precipitation? <i>40 CFR 112.7</i>		
4.7	The facility has a current SPCC plan in place that has been certified within the last 3 years or when modifications to the facility require technical amendments to the plan. <i>40 CFR 112.5</i>		
4.8	Facility has an Emergency Response Training Program and has objective evidence of emergency exercises or drills? <i>40 CFR 112.21</i>		

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5.0	CERCLA		
5.1	The facility is authorized to accept CERCLA regulated waste through the CERCLA Offsite Rule and the CERCLA waste is stored appropriately. <i>40 CFR 300.440</i>		

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6.0	FINANCIAL ASSURANCE		
6.1	<i>Liability Insurance</i>		
6.1.1	The facility has adequate liability insurance for both sudden and non-sudden liability coverage. Describe the General Liability limits and the company affording coverage. <i>40 CFR 264 Subpart H</i>		
6.1.2	The liability insurance is current. Note expiration date.		
6.2	<i>Closure Care</i>		
6.2.1	The facility has a written closure plan that identifies the steps necessary to perform partial and/or final closure of the facility. Describe any major amendments to the plan. <i>40 CFR 264.112</i>		
6.2.2	The facility has current written estimates for the cost of closing the facility in accordance with permit requirements. Compare the coverage identified in the financial assurance mechanism to the closure cost estimate in the Closure Plan (permit). <i>40 CFR 264.113</i>		
6.2.3	Describe the mechanism in place for financial assurance for closure costs. The closure cost estimate has been multiplied by the current inflation factor. <i>40 CFR 264.113</i>		

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6.2.4	Summarize the findings of the most recent Dunn and Bradstreet information for the Company.		

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7.0	SARA/EPCRA		
7.1	Has the facility exceeded EPCRA threshold planning quantities? Review the adequacy of the systems used to determine reporting applicability. If thresholds are exceeded, are proper notifications made? <i>40 CFR 355, Appendix A or B, 40 CFR 370.20</i>		
7.2	Are EPCRA Tier I and/or Tier II Reports generated by March 1 for this facility? <i>40 CFR 370.40, 40 CFR 370.41</i>		
7.3	Has the facility exceeded TRI reporting thresholds? Review the adequacy of the systems used to determine reporting applicability. If threshold are exceeded, are annual reports submitted by July 1? <i>40 CFR 372.30</i>		

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8.0	Environmental Monitoring		
8.1	Is the facility subject to any environmental monitoring requirements? If so, complete the table below.		

Monitored Media	# of Locations	Frequency	Summary of Data
Surface Water			
Ground Water			
Air			
Soil			
Vegetation			
Other			

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