



RCRA Permit Renewal Applications

What to Do. How to Do It.



TNRCC

Overview

RCRA permits for hazardous waste treatment, storage, or disposal (TSD) facilities must be renewed every 10 years. If your facility has an existing RCRA permit, your application for renewal must be submitted to the TNRCC at least 180 days prior to the date of permit expiration. The TNRCC issued general guidelines for renewal applications in a memorandum issued May 1996. Practical considerations for the renewal process, based on TNRCC policy and our experience at GSI are summarized below.

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Scope of Renewal Application

For the RCRA permit renewal application, TNRCC requires complete resubmittal of all relevant sections of the RCRA application forms (TNRCC-0283 and TNRCC-0376). A complete submittal is comprised of two to three major documents: i) the Part A Application, ii) the Part B Application, and iii) the Groundwater Compliance Plan Application (if a groundwater compliance monitoring program or corrective action program is required). Certain sections of the RCRA permit application will receive closer scrutiny by TNRCC and require more time to prepare than others. The scope and relative effort required for each application segment is summarized on Figure 1 attached.

How Much Work Is Involved?

The relative effort involved in preparation of the RCRA permit renewal application will depend largely on the degree to which existing permit files are complete and up-to-date, as well as the nature of any permit changes proposed in the renewal. Factors which may increase/reduce the magnitude of the renewal effort are as follows:



- **Proposed Changes in Existing Provisions:** Significant changes to the existing permit may include revisions to the Groundwater Detection Monitoring Program, Waste Analysis Plan, Closure Plans, or RCRA Contingency Plan, etc. According to their May 1996 policy memo, TNRCC intends to give extra attention to such modifications in the review process.
- **New or Expanded Units:** Detailed information regarding unit design/construction is required for any proposed additions of new hazardous waste management units or capacity expansions of existing units.



- **Permit Modification/Amendment History:** If the permit has not been recently amended or modified (i.e., within the last 2-3 years), the renewal application may entail significant effort to update the existing permit.
- **Facility Recordkeeping:** Complete copies of the original permit application and subsequent permit modification/amendment applications are needed to address current permit application requirements. Should any of the existing drawings and plans be missing, the applicant may need to prepare new versions for submittal with the renewal application. Copies of missing documents may be available for a fee from TNRCC Central Records Office in Austin, Texas.
- **Facility Compliance History:** Copies of the facility compliance history for the preceding 5 years must be submitted in the permit renewal application. TNRCC intends to closely review design and construction details for any existing units that have been subject to repeated or numerous compliance violations.
- **Notice of Registration:** TNRCC permit application forms require that the list of waste streams in the Part A application (Table III-1) and the Part B Waste Analysis Plan be with the facility Notice of Registration (NOR). If the facility NOR is not up-to-date, revisions will be necessary prior to preparation of the RCRA renewal application.
- **Proposed Closures:** Previously approved closure plans, post-closure care plans, and corrective action plans may require significant modification to meet current TNRCC technical guidelines.



Getting Started

For a major industrial facility, we recommend a minimum 6-month work period for preparation of the RCRA permit renewal application. This means that you should start work at least one year in advance of the permit expiration date in order to submit the application 180 days prior to permit expiration.

Key steps to consider in getting started are as follows:

- **Permit Records Review:** Organize facility files of the original permit application and all subsequent amendment and modifications. Identify those sections of the documents that are suitable for resubmittal with the renewal application and those sections which require significant revision.
- **Existing Permit Review:** Identify existing permit provisions that have proven problematic with regard to compliance over the past 10 years. The renewal application should seek to resolve compliance issues and enhance flexibility.
- **Project Staff:** Assign internal project coordinator. If needed, obtain environmental consulting services to staff document preparation.
- **TNRCC Coordination:** Consider a pre-application meeting with the TNRCC I&HW Permits Section coordinator for your facility to review the general permit renewal application process and address specific issues of concern.



PRELIMINARY REVIEW OF RCRA PERMIT RENEWAL REQUIREMENTS



Permit Renewal Submittal	Scope of TNRCC Review	Required Action for Renewal	Relative Level of Effort Required
Part A Application	• Complete: All subsections, emphasis on waste management process.	Update process flow diagrams and descriptions of current waste streams.	High
Part B Section I: General Information	• Partial: All subsections	Complete minor administrative update.	Low
Part B Section II: Facility Siting Criteria	• Partial: Floodplain conditions and surface impoundment exposure assessment.	Update flooding information and exposure assessment.	Low
Part B Section III: Facility Management Plans	• Partial: All subsections (except subsection F: Emergency Response Plan).	Document compliance history. Incorporate new training, inspection and contingency plans.	Moderate
Part B Section IV: Waste Analysis Plan	• Complete: All subsections, emphasis on waste management processes, characterization, land disposal restrictions.	Revise to match NOR, Part A, and current waste management practices.	High
Part B Section V: Engineering Reports	• Partial: Includes General Engineering Report, operating data, and as-built drawings. No review of technical specifications unless past compliance problems.	Prepare facility descriptions and enclose existing as-built drawings.	Moderate
Part B Section VI: Geology/Groundwater Monitoring Plan	• Partial: Limited to groundwater monitoring plans.	Prepare revisions to GWDMP, if needed.	Moderate
Part B Section VII: Closure Plans	• Complete: Review per new technical standards, Risk Reduction Rules.	Update closure plans for active units per current TNRCC standards.	Moderate
Part B Section VIII: Financial Assurance	• Partial: Emphasis on closure costs and related financial assurance.	Update based on new closure cost estimates.	Low
Part B Section IX: Releases/Corrective Action	• Complete: Emphasis on RFI requirements.	Prepare summary of RFI unit status.	Low
Part B Section X: OAQ Addendum	• Complete: Review per Subparts AA, BB, and CC emissions standards.	For active units, provide relevant data re: process vents, equipment leaks, Subpart CC requirements.	High
Part B Section XI: Application Fee	• Complete: Review per new fee scale.	Submit payment for renewal (\$2065) and any amendments (up to \$48,000).	Low
Part B Section XII: Confidential Material	• Complete: If applicable, review as needed.	Submit any confidential information on units in this section.	Low
Groundwater Compliance Plan	• Complete: Apply new TNRCC performance-based standards.	RFI provisions will move from permit to Compliance Plan. Need to re-apply for existing CP.	Moderate

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■ *GSI WILL CONTINUE TO PROVIDE periodic updates regarding important regulatory developments in Texas. Should you have any questions regarding these or other upcoming issues, please feel free to contact us at (713) 522-6300.*

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