GSI REGULATORY UPDATE BULLETIN

ISSUED: 1/14/98 GROUNDWATER SERVICES, INC.

RCRA Permit Renewal Applications

What to Do. How to Do It.



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 memo-

randum issued May 1996. Practical considerations for the renewal process, based on TNRCC policy and our experience at GSI are summarized below.

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 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

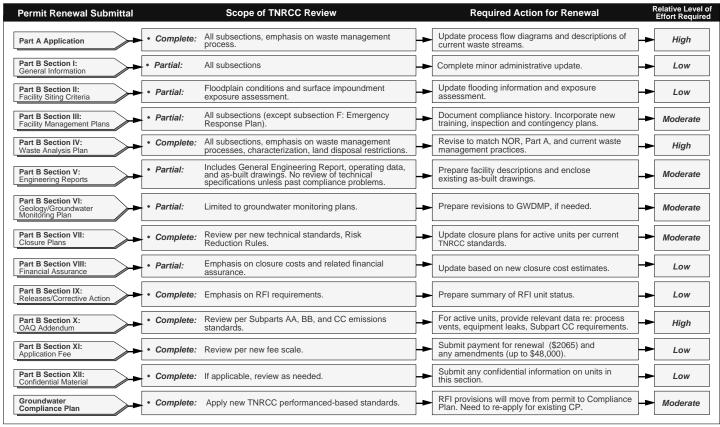
For a major industrial facility, we recommend a minimum 6-month work period for preparation of the RCRA permit renewal application. This means that you should start work at least one year in advance of the permit expiration date in order to submit the application 180 days prior to permit expiration.

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





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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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