APPLICATION REVIEW CHECKLIST  LAND PROTECTION DIVISION  HAZARDOUS WASTE PROGRAM	Facility Name: ODEQ Permit No.: Reference No.: Date: (New/Modify/Renewal)	40 CFR 264 Subpart S  CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS
OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY	Administrative Reviewer: Start Date: Completion Date:  Technical Reviewer: Start Date: Completion Date:  Issuance Deadline:	ODEQ Form Number XXX - XXX Shaded areas for ODEQ use only

<b>І</b> тем #	FEDERAL REGULATIONS 40 CFR	STATE REGULATIONS OAC 252:205	GENERAL DESCRIPTION	INFO LOCATION	ADMIN. COMPLETE	TECHNICALLY COMPLETE	Remarks
					YES/NO/NA	YES/No/NA	
CORRECT	CORRECTIVE ACTION MANAGEMENT UNITS (CAMUS) - 264.552						
CAMU 1	264.552(a)		To implement 264.101 or RCRA 3008(h), the Agency may designate an area as a CAMU, as defined in 264.10, in accordance with the requirements of this section.  One or more CAMUs may be designated at a facility.				
CAMU 2	264.552(a)(1)		Placement of remediation wastes in a CAMU does not constitute land disposal of hazardous wastes.				

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CAMU 3	264.552(a)(2)		Consolidation or placement of remediation wastes in a CAMU does not constitute creation of a unit subject to minimum technology requirements.				
CAMU 4	264.552(b)(1)		The Agency may designate or incorporate a regulated unit (as defined in 264.90(a)(2)) as a CAMU, if:				
			(i) the regulated unit is closed or closing (under 264.113 or 265.113); and				
			(ii) Inclusion of the regulated unit will enhance the remediation actions for the facility.				
CAMU 5	264.552(b)(2)		The subpart F, G and H requirements and the unit-specific requirements of part 264 or 265 that applied to that regulated unit will continue to apply after incorporation into the CAMU.				
CAMU 6	264.552(c)		The Agency shall designate a CAMU in accordance with the following:				
CAMU 7	264.552(c)(1)		The CAMU shall facilitate the implementation of sound remedies;				
CAMU 8	264.552(c)(2)		Waste management activities associated with the CAMU shall not create risks to humans or to the environment;				
CAMU 9	264.552(c)(3)		The CAMU shall include uncontaminated areas, only if for managing the remediation waste is more protective than management of such wastes at the contaminated areas;				
CAMU 10	264.552(c)(4)		The CAMU areas, where wastes remain in place after closure of CAMU, shall be managed and contained;				
CAMU 11	264.552(c)(5)		The CAMU will expedite the timing of remediation implementation, when appropriate and practicable;				

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CAMU 12	264.552(c)(6)		The CAMU shall enable the use of treatment technologies to enhance the long-term effectiveness of remedial actions by reducing the toxicity, mobility, or volume of wastes that will remain in place after closure of the CAMU; and				
CAMU 13	264.552(c)(7)		The CAMU shall minimize the land area upon which wastes will remain in place after closure of the CAMU.				
CAMU 14	264.552(d)		The facility shall provide sufficient information for the Agency to designate a CAMU in accordance with criteria in 264.552				
CAMU 15	264.552(e)		The Agency shall specify in the permit or order requirements for CAMUs to include the following:				
CAMU 16	264.552(e)(1)		The areal configuration of the CAMU.				
CAMU 17	264.552(e)(2)		Requirements for remediation waste management to include design, operation and closure.				
CAMU 18	264.552(e)(3)		Requirements for groundwater monitoring that are sufficient to:  (i) Continue to detect and to characterize the movement of existing releases of hazardous constituents to				
			groundwater from sources in the CAMU; and  (ii) Detect and characterize releases of hazardous constituents that may occur from areas of the CAMUs in which wastes will remain in place after closure of the CAMU.				
CAMU 19	264.552(e)(4)		Closure and post-closure requirements.				
17			(i) Closure of CAMUs shall:				
			(A) Minimize the need for further maintenance; and				
			(B) For close-in-place areas, control, minimize, or				

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CAMU 19 (cont.)	264.552(e)(4) (cont.)		eliminate post-closure escape of hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the environment.  (ii) Requirements for closure of CAMUs shall include the following, if appropriate:  (A) Excavation, removal, treatment or containment of wastes;  (B) Capping areas where wastes remain after closure;  (C) Removal and decontamination of equipment, devices, and structures used in remediation.  (iii) The Agency shall consider the following factors for establishing specific closure requirements:  (A) CAMU characteristics;  (B) Volume of wastes remaining in place after closure;  (C) Potential releases from the CAMU;  (D) Physical and chemical characteristics of the waste;  (E) Hydrological and other relevant environmental conditions; and  (F) Potential for exposure of humans and environmental receptors in a release.  (iv) Post-closure requirements for close-in-place areas to include monitoring, maintenance activities and frequency to ensure the integrity of the cap or other containment system.				

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CAMU 20	264.552(f)		The Agency shall document the rationale for designing CAMUs and shall make such documentation available to the public.				
CAMU 21	264.552(g)		Incorporation of a CAMU into an existing permit must be approved by the Agency under 270.41 or 270.42.				
CAMU 22	264.552(h)		The designation of a CAMU does not change the Agency's existing authority to address clean-up levels, point of compliance, or other remedy selection decisions.				
TEMPORA	ARY UNITS (TUS) - 2	64.553					
CAMU 23	264.553(a)		For temporary tanks and container storage areas used in remediation under 264.101 or RCRA 3008(h), the Agency may determine that a design, operating, or closure standard applicable to such unit may be replaced by alternative requirements.				
CAMU 24	264.553(b)		Any TU to which alternate requirements are applied under paragraph (a) of this section shall be:				
CAMU 25	264.553(b)(1)		Located within the facility boundary; and				
CAMU 26	264.553(b)(2)		Used only for treatment or storage of remediation wastes.				
CAMU 27	264.553(c)		The Agency shall consider the following factors for establishing standards for a TU:				
CAMU 28	264.553(c)(1)		Length of time such unit will be in operation;				
CAMU 29	264.553(c)(2)		Type of unit;				

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CAMU 30	264.553(c)(3)		Volumes of wastes to be managed;				
CAMU 31	264.553(c)(4)		Physical and chemical characteristics of the wastes;				
CAMU 32	264.553(c)(5)		Potential of release from the unit;				
CAMU 33	264.553(c)(6)		Hydrogeological and other relevant environmental conditions; and				
CAMU 34	264.553(c)(7)		Potential for exposure of humans and environmental receptors in a release.				
CAMU 35	264.553(d)		The Agency shall specify the length of time a TU will be allowed to operate, to be no longer than a year.				
			The Agency shall also specify the design, operating, and closure requirements for the unit.				
CAMU 36	264.553(e)		The Agency may extend the operational period once for no longer than one year beyond that originally specified, if the Agency determines that:				
CAMU 37	264.553(e)(1)		Continued operation of the unit will not pose a threat to human health and the environment; and				
CAMU 38	264.553(e)(2)		Continued operation of the unit is necessary to ensure timely and efficient implementation of remedial activities at the facility.				
CAMU 39	264.553(f)		Incorporation of a TU or a time extension into an existing permit shall be:				
CAMU 40	264.553(f)(1)		Approved in accordance with permit modification under 270.41; or				

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CAMU 41	264.553(f)(2)		Requested by the facility as a Class II modification under 270.42.				
CAMU 42	264.553(g)		The Agency shall document the rationale for designing a TU and for granting time extensions for TUs and shall make such documentation available to the public.				

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