

<p><b>APPLICATION REVIEW CHECKLIST</b></p> <p><b>LAND PROTECTION DIVISION</b> <b>HAZARDOUS WASTE PROGRAM</b></p>  <p><b>OKLAHOMA DEPARTMENT</b> <b>OF</b> <b>ENVIRONMENTAL QUALITY</b></p>	Facility Name: _____ Facility ID No.: _____ ODEQ Permit No.: _____ Reference No.: _____ Application Type: _____ Date: _____ (New/Modify/Renewal)	40 CFR 264 Subpart L  <u>WASTE PILES</u>
	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

ITEM #	FEDERAL REGULATIONS 40 CFR	STATE REGULATIONS OAC 252:205	GENERAL DESCRIPTION	INFO LOCATION	ADMIN. COMPLETE	TECHNICALLY COMPLETE	REMARKS
					YES/NO/NA	YES/NO/NA	
<b>APPLICABILITY - 264.250</b>							
WP-1	264.250(a)		Applicable to facility that stores/treats hazardous wastes in piles, except as 264.1				

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					YES/NO/NA	YES/NO/NA	
WP-2	264.250(b)		Not applicable to waste piles (WPs) that are closed with wastes in place (see req. of Subpart N - Landfills)				
WP-3	264.250(c)		Any WP, which is under a structure so that neither run-off nor leachate is generated, is not subject to 264.251 or Subpart F, provided that:				
WP-4	264.250(c)(1)		Free liquids are not placed in the pile;				
WP-5	264.250(c)(2)		The pile is protected from run-on				
WP-6	264.250(c)(3)		Dispersal of waste by wind controlled by means other than wetting; and				
WP-7	264.250(c)(4)		No leachate is generated through decomposition or other reactions				
<b>DESIGN AND OPERATING REQUIREMENTS - 264.251</b>							
WP-8	264.251(a)		A WP must have:				
WP-9	264.251(a)(1)		<p>A liner designed, constructed, and installed to prevent migration of wastes out the WP during the life of the WP (incl. the closure period). The liner must be:</p> <p>(i) Constructed of materials with chemical properties, sufficient strength and thickness to prevent failure;</p> <p>(ii) Placed upon a sound foundation; and</p> <p>(iii) Installed to cover all surroundings that are likely to be in contact with the wastes or leachate</p>				

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					YES/NO/NA	YES/NO/NA	
WP-10	264.251(a)(2)		A leachate collection and removal system (LCRS) immediately above the liner to collect and remove leachate from the pile. Leachate depth over the liner does not exceed 30 cm (one foot). The LCRS must be:  (i) Constructed of materials that are:  (A) Chemical resistant; and  (B) Of sufficient strength and thickness  (ii) Designed and operated to function without clogging through the closure period				
WP-11	264.251(b)		Exemption from the requirements of paragraph (a) of this section based on a demonstration by the facility. Considerations to grant an exemption:				
WP-12	264.251(b)(1)		The nature and quantity of wastes				
WP-13	264.251(b)(2)		The proposed alternate design and operation				
WP-14	264.251(b)(3)		The hydrogeologic setting				
WP-15	264.251(b)(4)		All other factors relating to leachate and groundwater				
WP-16	264.251(c)		New WPs after 1/29/92 must have two or more liners and a leachate collection and removal system above and between such liners				

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					YES/NO/NA	YES/NO/NA	
WP-17	264.251(c)(1)		(i) The liner system must include:  (A) A top liner is of materials to prevent migration of hazardous wastes into such liner during the active life and post closure care period  (B) A composite bottom liner consisting of two components: a geomembrane and a 3-foot compacted soil with hydraulic conductivity of no more than $1 \times 10^{-7}$ cm/sec.  (ii) The liners must comply with paragraphs (a)(1)(i), (ii), and (iii) of this section				
WP-18	264.251(c)(2)		The leachate collection and removal system (LCRS) immediately above the top liner must be functional during the active life and post-closure period. Leachate depth over the liner must not exceed 30 cm (1 foot). LCRS must comply with paragraphs (c)(3)(iii) and (iv) of this section				

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					YES/NO/NA	YES/NO/NA	
WP-19	264.251(c)(3)		LCRS between the liners of a multiple systems is also a leak detection system (LDS) that must be functional during the active life and post-closure period. A leak detection system, at a minimum must be: <ul style="list-style-type: none"> <li>(i) Constructed with a bottom slope of 1% or more;</li> <li>(ii) Constructed of granular drainage materials with a minimum hydraulic conductivity of <math>1 \times 10^{-2}</math> cm/sec, a minimum thickness of 12 inches; or a geonet drainage materials with a minimum transmissivity of <math>3 \times 10^{-5}</math> m<sup>2</sup>/sec;</li> <li>(iii) Constructed of materials with chemical resistance and strength;</li> <li>(iv) Designed and operated to minimize clogging; and</li> <li>(v) Constructed with sumps and liquid removal systems that are capable of measuring liquids present and removed.</li> </ul>				
WP-20	264.251(c)(4)		The facility shall collect and remove liquids in the sumps				
WP-21	264.251(c)(5)		The leak detection system must not be adversely affected by groundwater				
WP-22	264.251(d)		Approval of alternate design or operating practices to those specified in paragraph (c) of this section, if they:				
WP-23	264.251(d)(1)		Will prevent the migration of any hazardous constituent into the environment as effectively as those in paragraph (c) of this section; and				
WP-24	264.251(d)(2)		Will detect leaks through the top liner at least as effectively				
WP-25	264.251(e)		Paragraph (c) of this section does not apply to monofills that are granted a waiver in acc. with 264.221(e)				

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					YES/NO/NA	YES/NO/NA	
WP-26	264.251(f)		Exemption from paragraph (c) of this section for any replacement WP if:				
WP-27	264.251(f)(1)		The existing unit was constructed in acc. with RCRA 3004(o)(1)(A)(i) and (o)(5); and				
WP-28	264.251(f)(2)		The liner is functioning as designed				
WP-29	264.251(g)		A run-on control system must prevent flow onto the WP during the peak of a 25-year storm				
WP-30	264.251(h)		A run-off management system must collect water volume from a 24-hour, 25-year storm				
WP-31	264.251(i)		The holding facilities associated with the run-on and run-off control systems must be emptied expeditiously after the storm to maintain the design capacity				
WP-32	264.251(j)		Wind dispersal control				
WP-33	264.251(k)		The agency will specify other permit conditions to ensure the requirements of this section are satisfied				
<b>ACTION LEAKAGE RATE (ALR) - 264.252</b>							
WP-34	264.252(a)		The Agency shall approve an ALR for WP units subject to 264.251(c) or (d). The ALR is the maximum design flow rate that LDS can remove without the fluid head on the bottom liner exceeding 1 foot. The ALR must include an adequate safety margin				

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					YES/NO/NA	YES/NO/NA	
WP-35	264.252(b)		To determine if the ALR has been exceeded, the facility must convert the weekly or monthly flow rate under 264.254(c) to an average daily flow rate (gal/acre/day) for each sump. The average daily flow rate must be calculated weekly during the active life and closure period				
<b>RESPONSE ACTION - 264.253</b>							
WP-36	264.253(a)		The facility must have an approved response action plan before receiving wastes. The response action plan at a minimum as described in paragraph (b) of this section				
WP-37	264.253(b)		If the flow rate into the LDS exceeds the ALR for any sump, the facility must:				
WP-38	264.253(b)(1)		Notify the Agency in writing within 7 days				
WP-39	264.253(b)(2)		Submit a written assessment to the Agency within 14 days as to the amount of liquids, sources, location, size, cause, and short-term actions taken and planned				
WP-40	264.253(b)(3)		Determine the location, size, and cause of any leak				
WP-41	264.253(b)(4)		Determine whether waste receipt should be ceased or curtailed, whether any waste should be removed, and whether or not the unit should be closed				
WP-42	264.253(b)(5)		Determine any short-term and long-term actions				
WP-43	264.253(b)(6)		Within 30 days after the notification, submit to the Agency the results of analyses in paragraphs (b)(3), (4), and (5) of this section, the results of actions taken and actions planned. Monthly thereafter, as long as problems still occur, the facility must submit a report summarizing the results of any remedial actions taken and actions planned				

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WP-44	264.253(c)		To make the leak and/or remediation determinations in paragraphs (b)(3), (4), and (5) of this section, the facility must:				
WP-45	264.253(c)(1)		(i) Assess the source of liquids and amount of liquids by source  (ii) Conduct a fingerprint of the liquids in the leak detection system to identify the source, location of any leaks, and the hazard and mobility of the liquid  (iii) Assess the potential impact to the environment				
WP-46	264.253(c)(2)		Document why such assessments are not needed				
<b>MONITORING AND INSPECTION - 264.254</b>							
WP-47	264.254(a)		During construction and installation, liners and cover systems must be inspected for uniformity, damage, and imperfections. Immediately after construction or installation:				
WP-48	264.254(a)(1)		Synthetic liners and covers must be inspected				
WP-49	264.254(a)(2)		Soil-based and admixed liners and covers must be inspected				
WP-50	264.254(b)		While in operation, the facility must inspect weekly and after storms for:				
WP-51	264.254(b)(1)		Deterioration, malfunctions, or improper operation of run-on and run-off control systems				
WP-52	264.254(b)(2)		Proper functioning of wind dispersal control system				
WP-53	264.254(b)(3)		Presence of leachate and proper functioning of LCRS.				

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WP-54	264.254(c)		If a facility must have an LDS under 264.251(c), the facility must record the amount of liquid removed once a week during the active life and closure period				
<b>264.255 [RESERVED]</b>							
<b>SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE (IR) WASTE - 264.256</b>							
IR wastes must not be placed in a WP, unless the waste and the WP satisfy all requirements of 40 CFR 268, and:							
WP-55	264.256(a)		The waste is treated before or immediately after placement in the WP so that:				
WP-56	264.256(a)(1)		The resulting waste no longer meets the definition of IR under 261.21 or 23; and				
WP-57	264.256(a)(2)		Section 264.17(b) is complied with; or				
WP-58	264.256(b)		The waste is managed to protect it from any material or conditions which may cause to ignite or react; or				
<b>SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES - 264.257</b>							
WP-59	264.257(a)		Incompatible wastes must not be placed in the same pile				
WP-60	264.257(b)		Nearby incompatible wastes must be separated or protected by some means				
WP-61	264.257(c)		Hazardous waste must not be piled on the same base with incompatible waste, unless compliance with 264.17(b)				
<b>CLOSURE AND POST-CLOSURE CARE - 264.258</b>							

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WP-62	264.258(a)		At closure, the facility must clean close unless 261.3(d) applies.  ** The ODEQ may approved risk-based closure standards as an option for closure of a unit if requested by the facility**				
WP-63	264.258(b)		If the facility can not clean close or close to an acceptable risk-based level then the facility must perform post closure care as in acc. with 264.310 (landfills)				
WP-64	264.258(c)(1)		The facility that does not comply with liner requirements of 264.251(a)(1) and is not exempt from them acc. to 264.250(c) or 264.251(b) must:  (i) Include in the closure plan under 264.112: a plan to comply with (a) and a contingent plan to comply with (b) if not all contaminated subsoils can be removed; and  (ii) Prepare a contingent post-closure plan under 264.118 for complying with (b) if not all contaminated subsoils can be removed				
WP-65	264.258(c)(2)		Cost estimates under 264.142 and 144 for closure and post-closure must include the cost of complying with the contingent closure and post closure plans, but not the closure cost under paragraph (a) of this section				
<b>SPECIAL REQUIREMENTS FOR HAZARDOUS WASTES F020 THROUGH F027 - 264.259</b>							
WP-66	264.259(a)		Hazardous wastes F027 through F027 must not be placed in a WP unless a management plan for these wastes is approved by the Agency. Factors to be considered are:				
WP-67	264.259(a)(1)		The volume, physical, and chemical characteristics of the wastes, including the potential to migrate to the environment;				

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WP-68	264.259(a)(2)		The attenuative properties of the soils or other materials;				
WP-69	264.259(a)(3)		The mobilizing properties of other materials co-disposed with these wastes; and				
WP-70	264.259(a)(4)		The effectiveness of additional treatment, design, or monitoring techniques				
WP-71	264.259(b)		The Agency may impose additional requirements in order to reduce the possibility of migration of these wastes to the environment				

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