



## CLOSURE PLAN CONTENTS AND TECHNICAL REVIEW

### 3.5 - ESTIMATE AND MANAGEMENT OF MAXIMUM INVENTORY

A treatment and storage closure plan must include and be based on an estimate of the maximum inventory of all hazardous wastes ever held or are permitted to be held onsite at any time over the active life of the facility. The estimate of the maximum inventory should include the following wastes:

#### 1. Maximum Inventory of Hazardous Waste

a. Permitted Waste Capacity - The maximum inventory includes the waste capacity given in the Part A Permit Application and/or Part B Permit Application, and residues in all treatment systems, storage areas, satellite accumulation sites, and loading areas.

b. Waste Generated during Closure - The maximum inventory also includes the amount of hazardous waste and residues generated by sampling activities and facility decontamination (e.g., soil from sample boring, rinsewater, solvent rinse, sandblasting grit, personal protective garments and equipment).

c. Waste Generation Areas - If hazardous wastes are managed at "generator" areas at the facility, the maximum inventory should also include these hazardous wastes from manufacturing or process areas.

#### 2. Management of Maximum Inventory

The closure plan should include a detailed description of how the owner or operator will handle all hazardous wastes during final closure. The owner or operator may manage the inventory onsite (if appropriately permitted to do so) or have it treated/disposed offsite.

a. Onsite Management - Final closure activities may include onsite permitted treatment or disposal systems. Wastes may be treated onsite in the facility's permitted treatment system if capacity is available or in a transportable treatment unit. The Department may allow the owner or operator to expand or create a new unit at closure to treat or store wastes, but the owner or operator must first comply with the applicable permit modification or interim status modification regulations.

b. Offsite Management - If the waste inventory will be shipped offsite to hazardous waste treatment, storage or disposal facilities, the owner or operator must address the following in the closure plan:

! Procedures and criteria to determine if the waste is hazardous according to applicable federal and state regulations;

! An estimate of the quantity of hazardous waste to be sent offsite;

! A description of treatment or disposal methods at the final hazardous waste management facility to support the closure cost estimate;

! An estimate of the distance to the final hazardous waste management facility;

! Procedures the owner or operator will use to determine if the final hazardous waste management facility is permitted to accept the wastes generated from the closure activities; and

! Procedures the owner or operator will use to demonstrate compliance with all applicable federal and state regulations for hazardous waste generators and transporters (if appropriate), including maintaining copies of all

manifests and shipping papers as part of the closure documentation package.

### 3. Land Disposal Restrictions

The owner or operator who closes a hazardous waste facility and ships contaminated wastes and materials offsite for disposal is responsible for determining whether the wastes are subject to land disposal restrictions. If the owner or operator determines that the waste is a restricted waste that does not meet the specified treatment levels (and is thus prohibited from land disposal), the owner or operator must notify the designated treatment or disposal facility in writing of the treatment standards and prohibition of land disposal. If the owner or operator determines that a restricted waste can be land disposed of without further treatment, each shipment of that waste to a designated facility must have a notice and certification stating that the waste meets all of the applicable treatment standards. The closure plan should indicate that the owner or operator will comply with all land disposal restrictions requirements when sending hazardous wastes to offsite waste management facilities.

### 4. Changes in Maximum Inventory

The closure plan should describe procedures which the owner or operator will follow when the amount of maximum inventory onsite changes over the life of the facility. The owner or operator may either increase or reduce the maximum inventory from the quantity estimated in the approved closure plan.

a. Maximum Inventory Increase - The owner or operator may increase the amount of inventory, the estimate must be revised via a Class 1 (with an asterisk) permit modification or closure plan amendment pursuant to 22 CCR 66270.42 and 66265.112(c)(2), respectively. Increases in maximum inventory usually increases the permitted waste management capacity. If the increase is more than 25% of the permitted capacity, the owner or operator would be required to modify the permit or amend the Interim Status Document accordingly.

b. Maximum Inventory Reduction - If the owner or operator conducts partial closure of the treatment and storage units, the owner or operator may reduce the maximum inventory and up-date the closure cost. Reduction of maximum inventory should be processed via a Class 1 (with an asterisk) permit modification or closure plan amendment pursuant to 22 CCR 66270.42 and 66265.112(c)(2) respectively. Along with the permit modification or closure plan amendment request, the owner or operator should submit documentation (e.g., inventory treatment/removal procedures, manifests) showing that the hazardous wastes were actually treated onsite or removed offsite.

Since notification and certification that treatment and storage units underwent partial closure are not required until final facility closure, the Department has no assurance that the owner or operator has successfully decontaminated the units. To ensure sufficient funds are available for final decontamination and soil investigation, the closure cost estimate can only be reduced by the amount associated with the removal, transportation and treatment of the hazardous waste managed in the partially closed units.

### Key Questions

! Is the maximum inventory consistent with the total capacities of tanks and containers listed in the Part A Permit Application?

! Did the owner or operator include connections, such as piping, as contaminated equipment in the inventory?

WP File Name: CH0305\_C.MAN

List of Examples:

List of Attachments:

List of References:

List of Appendices: