

CLOSURE PLAN REVIEW FORM

TANK STORAGE AREA

Last Updated: July 2005

Facility Name		Reviewer / District Office	
Facility ID Number		Date Review of Plan Completed	
Date of Plan		Date Reviewed by Closure Coordinator	
Plan is: New, Amended, Revised		Date Reviewed by DDAGW (if applicable)	

This Closure Plan Review Form is #		of		forms completed in the review of this closure plan.
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Relevant Guidance Document Closure Plan Review Guidance for RCRA Facilities - OEPA/DHWM <http://epa.ohio.gov/portals/32/pdf/2008CPRG.pdf>

	YES	NO	N/A	Page #	Notes - NOD Comment #
I. General					
A) Facility Permit Status:					
Part A?					
Part B?					
Unpermitted Treatment, Storage, and Disposal Facility?					
B) Type of Closure:					
Full?					
Partial? If yes, list the other regulated units remaining (unclosed) at the facility in the Notes.					
C) Does the submitted plan describe closure for more than one unit? If yes, a separate closure plan review form shall be completed for each individual unit.					

	YES	NO	N/A	Page #	Notes - NOD Comment #
D) Is a summary and a description of unique features regarding the tank storage area(s) provided? If yes, please include in the Notes.					
II. Description of Facility					
A) Is a description of the type of industry, size, and products included? If yes, please include in the Notes.					
B) Is a description of the process(es) that generate(s) the hazardous waste included? If yes, please include in the Notes.					
C) Is a description of the facility's hazardous waste management methods included? If yes, please include in the Notes.					
III. Map of Facility					
A) Does the plan include a topographic and/or county map including a north arrow?					
B) Does the plan include a detailed facility map showing the location of each of the hazardous waste management units, including a north arrow, scale, and legend?					
IV. Description of Unit to be Closed					
A) Is the following information regarding the tank system(s) included? If yes, please include in the Notes.					
1) The age of the tank(s).					
2) The type of tank system - Aboveground, On-ground, In-ground, Underground. (See definitions in 3745-50-10)					
3) The maximum capacity of the unit(s) in gallons.					
4) Dimensions of the tank(s)					

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Facility - _____

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	YES	NO	N/A	Page #	Notes - NOD Comment #
5) Period of use for hazardous waste management					
6) Construction details (drawings/blueprints).					
7) Summary of geologic and hydrogeologic information.					
8) Proximity (depth) to ground water.					
9) Was the ground water plan review form completed? If it's not completed, provide the reason.					
B) Is the following information regarding the secondary containment included? If yes, please include in the Notes.					
1) The type of secondary containment provided - None*, Vault, Double-wall, External liner, Equivalent device. Please include in the Notes. *Note that if the unit has no secondary containment, the facility must comply with the requirements of OAC Rule 3745-66-97(C) or 3745-55-97(C) for submitting a contingent (landfill) closure plan.					
2) The material used to construct the secondary containment system.					
3) The age of the secondary containment.					
4) That the condition of the secondary containment: is it structurally sound, free of cracks/holes, visible staining and other potential evidence/mechanisms of release. Include the basis of this determination (i.e.: facility statements, visual observation, etc.).					
C) Is the following information regarding the ancillary equipment included? If yes, please include in the Notes.					
1) The type of secondary containment (if any) that is provided specifically for the ancillary equipment.					

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B) Were the method(s) used to characterize the waste(s) listed? If yes, please include in the Notes.					
C) Is the characterization adequate? If no, please include in the Notes.					
D) Are any of these waste types flammable? If yes, please include in the Notes.					
E) Were there any other types of wastes previously managed in the tank system? If yes, did the unit meet closure performance standards for those constituents?					
VI. Removal of Hazardous Waste					
A) Is the amount of waste present (in this unit only) at beginning of closure included? If yes, please include in the Notes.					
B) Are the disposal facility(ies) included? If yes, please include in the Notes.					
C) Are the transporter(s) included? If yes, please include in the Notes.					
D) Is the staging & loading described? If yes, please include in the Notes.					
E) Will the waste be treated on-site or sent to a permitted TSD Facility? Please include information in the Notes.					
VII. Schedule for Closure					
A) Does the plan detail all critical milestones for closure and state when a Professional Engineer (licensed and registered in the state of Ohio) will be present?					

	YES	NO	N/A	Page #	Notes - NOD Comment #
B) Does the plan list which activities the inspector will be notified of? If information given is not adequate, please include in the Notes.					
C) Does the plan state that Ohio EPA will be given five working days notice before activities as listed in the above question occur?					
D) Does the closure plan indicate how long closure activities will take and is this time frame realistic? Please include information in the Notes.					
VIII. Other Permits					
A) Will other permits be required for successful implementation of this plan? If yes, please include in the Notes.					
B) Does the plan address NPDES, air emission, or other permit requirements?					
IX. Health and Safety Plan					
A) Does the closure plan indicate that the facility will comply with applicable OSHA requirements, including a Health and Safety Plan?					
X. Decontamination					
A) Unit and/or Secondary Containment Fate/Destiny:					
1) Does the plan state what will happen with the unit upon completion of closure? If yes, please include in the Notes.					
2) Does the plan state what will happen with the secondary containment upon completion of closure (i.e., Will the pad be used as a <90-day storage area, will it be scrapped, etc.)? If yes, please include in the Notes.					

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3) Does the plan state if any of the parts of the tank are to be recycled? If so, please include in the Notes.					
4) Based on the fate of the tank as described above, is the tank system required to be decontaminated to meet rinsate standards? If so list methods and standards in the table below:					

Decontamination of structures and equipment		
Structure or Equipment	Method	Standard

X. <u>Decontamination (continued)</u>					
B) Does the plan state the volume of rinsate expected to be generated? If yes, include volume and describe how rinsate will be managed and disposed in the Notes.					
C) Does the plan state volume of debris expected to be generated? If yes, include volume and describe how debris will be managed and disposed in the Notes.					
D) Does the plan state if the rinsate and debris will be managed as hazardous waste? If yes, include details in the Notes. If no, how was that determination made and is it realistic?					

X. Decontamination (continued)					
E) Does the plan state a description of release control? (decon pad) Include this description in the Notes.					
XI. Closure Strategy/Remediation Standards					
Strategy (choose all that apply)	Describe how strategy will be applied below			Links to other Plan Review Forms (PRFs)	
A) Closure by removal to background conditions for naturally occurring compounds (using either the CPRG's alternate metal standards or site-specific background remediation standards). Complete Remediation Standards Table below.				- Complete Data Collection and Analysis PRF http://epa.ohio.gov/portals/32/pdf/dca-prf.PDF	
B) Closure by removal to method detection limits for non-naturally occurring compounds. Complete Remediation Standards Table below.				- Complete Data Collection and Analysis PRF http://epa.ohio.gov/portals/32/pdf/dca-prf.PDF	
C) Closure by removal or decontamination to risk-based standards (site-specific or generic cleanup numbers from the CPRG). Complete Remediation Standards Table below.				- Complete Data Collection and Analysis PRF http://epa.ohio.gov/portals/32/pdf/dca-prf.PDF - Complete Risk Assessment PRF http://epa.ohio.gov/portals/32/pdf/risk-prf.PDF	
1) Does the closure plan include language regarding the owner/operator's commitment to file a use restriction agreement and willingness to enter into an order? Note: If the facility proposes to use an industrial cleanup standard with a use restriction to the property, then obtain legal involvement as soon as possible.					
D) Waste In Place Closure				- Complete Waste Pile / Surface Impoundment PRF http://epa.ohio.gov/portals/32/pdf/wp-siprf.PDF - Complete Ground Water PRF http://epa.ohio.gov/portals/32/pdf/gw-prf.PDF	

Remediation Standards		
Constituent *	Numeric Remediation Standard(s) for Contaminated Media (if applicable)	Type of Standard (MDL, Risk-based, Background, BRS, AMS)

* This list should match the list of hazardous waste constituents as stated in Section V.

	YES	NO	N/A	Page #	Notes - NOD Comment #
XII. Sampling Plan and Analytical Procedures					
A) Does the plan include a soil Sampling and Analysis Plan as detailed in Section 3.11 of the 2005 CPRG - including sampling of cracks/holes, sump areas and areas of runoff/visible staining? If yes, the Data Collection and Analysis (http://epa.ohio.gov/portals/32/pdf/dca-prf.PDF) and Data Validation PRFs (http://epa.ohio.gov/portals/32/pdf/TierIDVManual.pdf) should be completed along with this form.					
B) Does the plan state that the full nature and extent of contamination will be determined and addressed?					
XIII. Description of Removal Efforts and Treatment Processes					

	YES	NO	N/A	Page #	Notes - NOD Comment #
A) Does the closure plan propose removal/excavation of contaminated media? If yes, please include the following information in the Notes:					
1) Type of contaminated media known/anticipated (this would include soil, fill material, etc.).					
2) Estimated volume of contaminated soil/fill to be removed (include units).					
3) Disposal Facility(ies).					
4) Transporter(s).					
5) If the waste subject to the land disposal restrictions (LDRs) of OAC chapter 3745-270, does it meet the universal treatment standards?					
6) Description of the staging & loading.					
B) Is the goal of this removal stated (i.e., removal of "hot spots" only, closure by removal, closure demonstrated by risk assessment, other)? If yes, please include in the Notes.					
C) Does the plan state whether the media will be treated on-site or sent to a permitted TSD Facility? If yes, please include in the Notes.					
XIV. Certification					
A) Does the closure plan indicate that the certification will include the wording found in OAC rule 3745-50-42(D)?					
B) Does the closure plan state the status (e.g., post-closure) of the unit and the facility upon completion of closure? If yes, please include in the Notes.					

	YES	NO	N/A	Page #	Notes - NOD Comment #
C) Does the plan state what documentation will be submitted with the closure certification? If yes, please include in the Notes.					
XV. Financial Assurance Documentation					
A) Was a closure cost estimate submitted to Central Office or included with this closure plan submittal?					