



Hazardous Waste Treatment, Storage, and Disposal Facility Permit Administrative Completeness Review Checklist

Checklist Instruction

This checklist is provided as a guideline for ADEQ staff in performing administrative completeness reviews and to the applicant on what information ADEQ will need to administratively review a TSDF permit application. This checklist is designed to ensure the applicant provides information necessary to review the application.

Applicant: Ecobat Solutions Arizona, Inc.		LTF: 103043			
Reviewer: Chuck Allen		Date: 12/5/2024			
Item		Comments	Y	N	N/A
APPLICATION COMPONENTS					
Submittal Format:					
Physical Copy:	One complete original of Parts A and B	Received 11/4/2024	✓		
Electronic Copy:	One full PDF of Parts A and B	Received 11/4/2024	✓		
Electronic Copy:	All Word, Excel, and graphic files associated with permit (i.e., Part B files, Facility and Construction Diagrams, etc.)	Received 11/4/2024	✓		
Character Background Reference forms		Part A Application	✓		
Operating Permit/Post-Closure Permit Application Checklist		Physical and electronic (PDF)	✓		
Certification of compliance with the U.S. EPA RCRA expanded public participation rule		Pre-App Meeting held March 21, 2024	✓		
The applicant must have a U.S. EPA ID Number assigned for the facility at the time of submittal		AZR000527002	✓		
An initial application submittal fee, \$20,000.00 for a new or renewal of an existing TSDF		Invoice 0000416512X paid 11/20/2024	✓		
If any of the following items are missing from the application, the application is UNADMITTABLE: <ul style="list-style-type: none"> • Part A • Part B • Applicant signature (see Subtitle C Site ID Form No. 19) • Requsite fee per R18-8-270.G [paid 11/20/2024] 					
SECTION A. PART A GENERAL INFORMATION REQUIREMENTS					
Part A - Subtitle C Site ID Form:					
Item 1. Reason for submittal			✓		
Item 2. EPA ID number			✓		
Item 3. Site name			✓		
Item 4. Site location address			✓		
Item 5. Site mailing address			✓		
Item 6. Site land type			✓		
Item 7. NCAIS codes for the site			✓		
Item 8. Site contact information			✓		
Item 9. Legal owner and operator of the Site			✓		
Item 10. Type of regulated waste activity			✓		
Item 11. Additional regulated waste activities			✓		
Item 12. Eligible academic entities with laboratories			✓		
Item 13. Episodic generation			✓		

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Item	Comments	Y	N	N/A
Item 14. LQG consolidation of VSQG HW		✓		
Item 15. Notification of LQG site closure for CAA or entire facility		✓		
Item 16. Notification of hazardous secondary material (HSM) activity		✓		
Item 17. Electronic manifest broker		✓		
Item 18. Comments		✓		
Item 19. Certification, signed by owner and operator		✓		
Part A - Part A Form:				
Item 1. Facility permit contact and telephone number		✓		
Item 2. Facility permit contact mailing address		✓		
Item 3. Facility existence date		✓		
Item 4. Listing of all other environmental permits received		✓		
Item 5. Nature of business		✓		
Item 6. Process codes and design capacities		✓		
Item 7. Description of hazardous wastes		✓		
Item 8. Map	Att B, Fig B-1	✓		
Item 9. Facility drawing		✓		
Item 10. Photographs		✓		
Item 11. Comments		✓		
Part B				
SECTION B. FACILITY DESCRIPTION				
General Description 270.14(b)(1) location information 270.14(b)(11)	Att B, 1	✓		
Flood plain 270.14(b)(11)(iii)	Att B, 3.2; Fig B-3, 4			
Surrounding land use	Att B, 1; zoning map – Fig B-4	✓		
Surface waters	Att B, 2; no surface waters w/i 1000 ft	✓		
Wind rose	Att B, 3.4; Fig B-2a	✓		
Map orientation	Att B, Fig B-1	✓		
Legal boundaries	Att B, 3	✓		
Access control	Att F, 2.0	✓		
Injection and withdrawal wells	Att B, 3; Att B, 3.3 – two drywells on-site	✓		
Buildings and other structures	Att D, Fig D-2, 3	✓		
Drainage and flood control	Att B, 2, 3.2; no drainage barriers or flood control structures w/i 1000 ft	✓		
Location of SWMUs	Att A, 7	✓		
Groundwater	Not req'd for container storage; only req'd for land disposal units			✓
Seismic requirements 270.14(b)(11)(i) and (ii)	Att B, 3.1; Fig 3 (not in fissure study area)	✓		
Traffic patterns 270.14(b)(10)	Att B, 4; Fig B-5;	✓		
SECTION C. WASTE CHARACTERISTICS 270.14(b)(2)				
Waste Analysis Plan 270.14(b)(3)	Att C	✓		
SECTION D. PROCESS INFORMATION				
Containers 270.15	Att D	✓		
Management Practices	Att D, 1-3	✓		
Secondary containment	Att D, 3	✓		
Run-on & run-off control 270.14(b)(8)(ii)	Att D, 3.5	✓		

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Item	Comments	Y	N	N/A
Tanks				✓
Description and capacity				✓
Certified Integrity assessment				✓
Secondary containment				✓
Leak detection requirements				✓
Other Waste Units				✓
SECTION E. GROUNDWATER MONITORING				
Groundwater monitoring exemption pursuant to 270.14(c)	Exempt - applies to regulated units (SIs, waste piles, land treatment units, landfills) – 264.90(a)(2)			✓
Groundwater monitoring plan, if not exempt				✓
Hydrogeological information				✓
Well location, construction details				✓
Sampling and analysis plan (SAP)				✓
Groundwater monitoring program (GWMP)				✓
Statistical procedures				✓
SECTION F. PROCEDURES TO PREVENT HAZARDS				
Security procedures 270.14(b)(4)	Att F, 2.0	✓		
Inspection requirements for each containment system 270.14(b)(5)	Att F, 3.0	✓		
Management of incompatible Waste	Att F, 7.0	✓		
Management of ignitable waste	Att F, 7.0	✓		
Fire prevention plan	Att J Att F, 3.1, 3.4– thermal runaway event.	✓		
SECTION G. CONTINGENCY PLAN (270.14(b)(7))				
Contingency plan coordinators	Att G, preface, 3.0	✓		
Emergency actions	Att G, 5.0	✓		
Emergency equipment	Att G, 6.0	✓		
Arrangement with local authorities	Att G, 7.0, 1.2, 1.3, 5.10	✓		
Evacuation plan	Att G, 8.0	✓		
Reporting and recordkeeping procedures	Att G, 10.0	✓		
SECTION H. PERSONNEL TRAINING				
Training program outline 270.14(b)(12)	Att H, 2	✓		
Description of training 270.14(b)(12)	Att H, 2.2; Att G, 9.0	✓		
SECTION I. CLOSURE/POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS				
Closure plans 270.14(b)(13)	Att I	✓		
Post-closure Plan 270.14(b)(13)	Att I, 4.0, 4.7, 5.3 clean closure	✓		
Required notices	Att I, 1.4	✓		
Cost estimates for closure and post-closure 270.14(b)(15) and (16)	Att I, 5.1 and 5.3	✓		
Financial assurance for closure and post-closure 270.14(b)(15) and (16)	Att I, 5.0, 5.2, 5.3	✓		
Liability requirements 270.14(b)(17, (18))	Att I, 6.2	✓		
SECTION J. SOLID WASTE MANAGEMENT UNITS				
Description of SWMUs	Att A, 7; RFA	✓		
Description of releases	See RFA	✓		
SECTION K. OTHER FEDERAL LAWS				
Demonstrate compliance with requirements of other applicable Federal laws	Att K	✓		

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SECTION L. PART B CERTIFICATION				
Part B Certification	RCRA Pt. B App	✓		
SECTION M. SUBPART AA PROCESS VENTS				
Subpart AA applicability	Applies to process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10 ppmw. Conduct substantive review.			✓
Design, operation, monitoring, and inspection				✓
SECTION N. SUBPART BB EQUIPMENT LEAKS				
Subpart BB applicability	Applies to equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight. Conduct substantive review.			✓
Equipment description				✓
Monitoring program, recordkeeping and reporting				✓
SECTION O. SUBPART CC AIR EMISSION STANDARDS				
Subpart CC applicability	264.1080 264.1086 270.27 (containers) - air emission controls? Contains ≥ 500 ppmv VO. Conduct substantive review.			✓
List of units that are exempt				✓
Tanks, surface impoundments, or containers requirements				✓
Implementation plan				✓
Monitoring plan				✓
Reporting and recordkeeping requirements				✓
SECTION P. EXPOSURE INFORMATION				
Only for surface impoundments and land disposal units				✓
SECTION Q. SUBPART X MISCELLANEOUS UNITS				
Subpart X applicability				✓
Environmental performance standards				✓
Monitoring, inspection, and reporting				✓
SECTION R. CORRECTIVE ACTION				
Corrective Actions	Reserved; 264.101 and 264, Subpart S, 270.14(d)	✓		