

HWAC Update On Generator Closure

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Presentation Outline

- “Generator Closure”
- Self Implementing Nature Of The Requirement
- Existing Generator Closure Guidance
- Possible Enhancements
 - Development of Best Management Practices For Generator Closure
 - Possible Regulatory Changes

“Generator Closure”

- Closure of an Inactive Hazardous Waste Management Unit Previously Operated By An LQG or SQG
- Applicable State Regulations:
For LQG Units - RCSA Section 22a-449(c)102(a)(2)(k)
For SQG Units - RCSA Section 22a-449(c)102(c)(4)



- * 40 CFR 265.111 - Closure Performance Standard
- * 40 CFR 265.113(a),(b), and (c) - Time Allowed For Closure
- * 40 CFR 265.114 - Disposal/Decontamination

Not Intended To Address:

- Units Subject To Interim Status Closure Standards
- Permitted Units
- CESQG Storage Areas
- Satellite Accumulation Areas

Self-Implementing Requirement

- Unlike Closure Of Treatment, Storage, Or Disposal Units, Generator Closure Is Self-Implementing.
- Generally, There Is No Formal Department Review, Approval, Public Notice, Etc.
- Lack Of Formal Process Has Lead To:



Uncertainty And Questions

Existing Generator Closure Guidance:

- Designed To Provide Guidance On How To Meet Relatively Broad “Closure Performance Standard”
 - * Contaminant Characterization
 - * General Clean-Up Suggestions
 - * Measurements For Closure Success
- Does Not Cover:
 - Time Allowed for Closure
 - Removal Of Waste Inventory From Unit
- Fairly Prescriptive
- Provides Limited Alternatives For Structures
- Contains Limited Information On Recordkeeping

Possible Enhancements

- Development Of Best Management Practices For Generator Closure
 - To Address Gaps In Existing Guidance
- Possible Regulatory Changes
 - To Help Provide Clarification

Best Management Practices For Generator Closure

Why Develop??? Opportunity For Improvements:

- Address Time Allowed For Closure And Removal Of Waste Inventory Issues
- Identify Additional Closure Concepts/Methods
 - * Including Alternatives For Concrete Structures
 - * Consideration of Site Wide Issues
- Update/Improve Recordkeeping Suggestions
- Identify Proactive Management Practices For More Efficient Closure In Future

Possible Regulatory Changes

- Existing Language For “Time Allowed For Closure”
40 CFR 265.113(a)(b)(c) - Has Lead To Some Questions



In Response, Plan To Replace With Simplified Language

- Specify Recordkeeping Requirements:
 - Documentation Of Closure
 - Records Retention Period