

RCRA Part B Compliance Plan Common Deficiencies

Section XI.A – Site Specific Information

CP Attachment A Sheets

- Figures should be appropriately labeled as “CP Attachment A, Sheet X of Y.”
- Topographic maps and aerial photos are provided as supplemental information in the application. These maps should not be labeled “CP Attachment A, Sheet X of Y” because these figures are not included in the Final Draft Permit (FDP).
- CP Attachment A Sheets should be presented in the following order:
 - Facility property map(s)
 - RCRA-regulated waste management unit / Solid waste management unit (SWMU) / Area of Concern (AOC) location map(s)
 - Groundwater monitoring well location map(s) for the SWMU(s)/AOC(s) listed in CP Table I.
- Each CP Attachment A Sheet is included in the FDP. Therefore, each Sheet should:
 - Clearly identify in legible font the location of all RCRA-regulated units, SWMUs, AOCs, facility property boundaries, and, if applicable, plume management zone (PMZ) boundaries and/or Facility Operations Area (FOA) boundaries.
 - Clearly identify in legible font the location of all monitoring wells (e.g., point of compliance wells, point of exposure wells, attenuation monitoring points, corrective action observation wells, etc.). Each type of monitoring well should be represented by a different symbol so that the wells are easily distinguished from one another.
 - If applicable, clearly identify attenuation monitoring points (AMPs) and their respective attenuation action levels (AALs) in a text box next to the AMPs.
 - Not contain colored areas or colored symbols. The colored areas are not distinguishable when included in the FDP.
 - Be submitted as an 8.5” x 11” black and white figure.

CP Table I

- CP Table I.A should only list RCRA-regulated units subject to corrective action monitoring.
- CP Table I.B should only list RCRA-regulated units subject to compliance monitoring.
- CP Table I.C should only list SWMUs and/or AOCs subject to corrective action monitoring.
- CP Table I.D. is for a release that is subject to corrective action monitoring from a RCRA-regulated unit that is commingled with one, or more, SWMUs and/or AOCs. The RCRA-regulated unit should be clearly distinguished from the SWMUs/AOCs in CP Table I.D.

- If a PMZ is proposed as a response action for corrective action monitoring, then the RCRA-regulated units, SWMUs, and/or AOCs within the PMZ should be listed in CP Table I (i.e., do not just list the name of the PMZ in CP Table I).
- The nomenclature for each RCRA-regulated unit, SWMU, and AOC listed in CP Table I should be consistently used in the rest of the applicable Compliance Plan Tables (i.e., CP Tables III, IIIA, IV, IVA, V, and VI).

CP Table II

- CP Table II should include a site-specific list of all SWMUs and AOCs previously, or currently, subject to RFI corrective action.
- CP Table II should include the environmental media impacted for each SWMU/AOC.
- CP Table II should reflect the remediation status of the impacted media for each SWMU/AOC:
 - If the Corrective Action Response Objectives have been achieved for a SWMU/AOC, specify the Remedy Standard that was completed and the approval date for “No Further Action.”
 - If the Corrective Action Response Objectives have been met for some impacted media for a SWMU/AOC, include the Remedy Standard and the “No Further Action” approval date for the media that have completed the Response Objectives.
 - If the Corrective Action Response Objectives have not yet been achieved for a SWMU/AOC, then this information should be left blank.

Section XI.B – Groundwater Protection Standards (GWPS)

CP Table III and CP Table IIIA

- CP Table III is for the Corrective Action Monitoring Program. It should include the long list of hazardous constituents of concern (COCs) that were managed at the RCRA-regulated unit, SWMU, or AOC or the COCs that were detected as part of the release investigation. CP Table III should include daughter products as applicable.
- CP Table IIIA is for the Corrective Action Monitoring Program. It is the “short list” of COCs that are derived from CP Table III. The COCs included on CP Table IIIA should be those that are the most toxic, the most mobile, and/or are the best indicator COCs of the release. CP Table IIIA should include daughter products as applicable.
- Each COC listed in CP Tables III and IIIA should use the correct GWPS (i.e., the most up-to-date protective concentration levels (PCLs) derived through TRRP).
- Attenuation action levels (AALs) developed for attenuation monitoring points (AMPs) should not be listed in CP Table III or CP Table IIIA. Instead, AALs and AMPs should be listed in CP Attachment A Sheets.

CP Table IV

- CP Table IV is for the Compliance Monitoring Program. It should include the long list of COCs that were managed at the RCRA-regulated unit or the COCs that were detected as

part of the release investigation. CP Table IV should include daughter products as applicable.

- The concentration limit for each COC in CP Table IV should be the respective method quantitation limit (MQL), practical quantitation limit (PQL), or background concentration of the COC.

CP Table IVA

- CP Table IVA is for the Compliance Monitoring Program. It is the “short list” of COCs that are derived from CP Table IV. CP Table IVA should include daughter products as applicable.
- Each COC listed in CP Table IVA should use the correct GWPS (e.g., the most up-to-date PCLs derived through TRRP).

Section XI.C - Compliance Monitoring Program

- The Compliance Monitoring program only applies to RCRA-regulated units (pursuant to 30 TAC §335.165). It does not apply to SWMUs or AOCs.
- If there are no RCRA-regulated units subject to compliance monitoring, then Section XI.C, CP Table IV, and CP Table IVA should be marked as “Reserved”.
- Each RCRA-regulated unit subject to compliance monitoring should have at least one background well and a sufficient number of downgradient point of compliance (POC) wells. These wells should be included in CP Table V and identified in CP Attachment A figure(s).
- Additional supplemental wells that are used as part of the Compliance Monitoring Program, but are not POC wells, point of exposure (POE) wells, alternate point of exposure (APOE) wells, or background wells, should be identified in the CP Attachment A figure(s). These supplemental wells should not be included in CP Table V.
- RCRA-regulated units subject to compliance monitoring should not be located within the boundaries of an established PMZ or within the boundaries of an authorized Facility Operations Area (FOA).
- For RCRA-regulated units subject to compliance monitoring, the frequency of groundwater monitoring should be semi-annual.
 - If a RCRA-regulated unit has completed 30 years of post-closure care, the applicant can propose to change the frequency of groundwater monitoring to annual monitoring.

Section XI.D - Corrective Action Program

- The application should include a Response Action Plan (RAP) when adding a new RCRA-regulated unit, SWMU, or AOC to corrective action monitoring or when incorporating major changes to the existing corrective action program for the unit/area.
 - It is strongly advised that a draft RAP be submitted, and approved, by the TCEQ Remediation Division Project Manager before submitting the RAP as part of the permit application.

- When requesting termination of correction action monitoring for a RCRA-regulated unit, SWMU, or AOC, the applicant should include a Response Action Completion Report (RACR) to document termination of corrective action for the unit/area.
 - It is strongly advised that a draft RACR be submitted, and approved, by the TCEQ Remediation Division Project Manager before submitting the RACR as part of the permit application.
- Copies should be provided of supporting conditional approval letters issued by the TCEQ Remediation Division for all RAPs and RACRs attached to the permit application.
- If there are no RCRA-regulated units, SWMUs, or AOCs subject to corrective action monitoring, then Section XI.D, CP Table III, and CP Table IIIA should be marked as “Reserved”.
- Each RCRA-regulated unit, SWMU, and AOC subject to corrective action monitoring should have a sufficient number of POC, POE, APOE, and/or background wells. These wells should be included in CP Table V and identified in CP Attachment A figure(s).
- Additional monitoring wells used as part of the corrective action monitoring program (e.g., corrective action observation wells, attenuation monitoring points, corrective action system wells, supplemental wells, etc.) should not be included in CP Table V. These wells should only be identified in CP Attachment A figure(s).
- For RCRA-regulated units, SWMUs, and AOCs subject to corrective action monitoring, the frequency of groundwater monitoring should be semi-annual.
 - If a RCRA-regulated unit has completed 30 years of post-closure care, the applicant can propose to change the frequency of groundwater monitoring to annual monitoring.
- When establishing a corrective action monitoring program for a new SWMU/AOC, the schedule for monitoring and reporting that was provided in the RAP will be replaced by the monitoring and reporting schedule established in the permit.

Section XI.E – Financial Assurance

- Financial assurance calculations should be based on the Groundwater Sampling and Analysis Plan that is incorporated as part of the permit (i.e., the calculations should not be based solely on the monitoring wells listed in CP Table V).
- For ease of calculation and review, more than one Table XI.E.2 can be used to calculate the financial assurance estimate for a site. Regardless of the number of tables used, the total financial assurance estimate should be entered on Table XI.E.3.
- Please ensure that the correct groundwater monitoring frequency for each RCRA-regulated unit, SWMU, and AOC is reflected on Table XI.E.2.
- For Table XI.E.3, please use the instructions in the permit application to calculate the total number of years that is used to calculate the financial assurance estimate. Please note that this step is often skipped.
- Table XI.E.3 is required but is often missing from the permit application.

Attachment C – Groundwater Sampling & Analysis Plan (SAP)

- The applicant should submit a generic groundwater Sampling and Analysis Plan (SAP). The SAP should reference the CP Tables and CP Attachment A figures rather than

specific wells and COCs. This will reduce the number of revisions in the future to the SAP.

- The SAP should include measurements of well depths, well siltation, presence/absence of non-aqueous phased liquids (NAPLs), and the NAPL thicknesses for each well.
- The SAP should include a procedure to monitor weather conditions at the time of sampling.
- The SAP should specify that micro-purging shall be conducted at a rate of 0.1 - 0.5 L/min with a drawdown of 0.1 m or less. The screened interval shall be sampled for inline measurements of redox, dissolved O₂, and turbidity. The SAP should specify the procedures for determining groundwater parameter stabilization.