## Appendix A

## Approval Modification Classifications TSCA Approval US Ecology Nevada, Inc.

## **Appendix A - Approval Modification Classifications**

| Modifications   | Class          |
|---|----------------|
| A. General Approval Provisions  |                |
| 1. Administrative and informational changes   | 1              |
| 2. Correction of typographical errors   | 1              |
| 3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls)   | 1              |
| 4. Changes in the frequency of or procedures for monitoring, reporting, sampling, or maintenance activities by US Ecology:  |                |
| a. To provide for more frequent monitoring, reporting, sampling, or maintenance   | 1              |
| b. Other changes  | 2              |
| 5. Schedule of compliance/construction:   |                |
| a. Changes in interim compliance dates, with prior approval of U.S. EPA   | 1 <sup>1</sup> |
| b. Extension of final compliance date   | 3              |
| 6. Changes in expiration date of Approval to allow earlier termination, with prior approval of U.S. EPA   | 11             |
| 7. Changes in ownership or operational control of a facility  | 1 <sup>1</sup> |
| 8. Changes to remove Approval conditions that are no longer applicable ( <i>i.e.</i> , because the standards upon which they are based are no longer applicable to the facility). | 1 <sup>1</sup> |
| B. General Facility Standards   |                |
| 1. Changes to waste sampling or analysis methods:   |                |
| a. To conform with agency guidance or regulations   | 1              |
| b. To incorporate changes associated with F039 (multi-source leachate) sampling or analysis methods   | 1              |
| c. To incorporate changes associated with underlying hazardous constituents in ignitable or corrosive wastes  | 1 <sup>1</sup> |
| d. Other changes  | 2              |

| 2. Changes to analytical quality assurance/control plan:  |                |
|---|----------------|
| a. To conform with agency guidance or regulations   | 1              |
| b. Other changes  | 2              |
| 3. Changes in procedures for maintaining the operating record   | 1              |
| 4. Changes in frequency or content of inspection schedules  | 2              |
| 5. Changes in the training plan:  |                |
| a. That affect the type or decrease the amount of training given to employees   | 2              |
| b. Other changes  | 1              |
| 6. Contingency plan:  |                |
| a. Changes in emergency procedures (i.e., spill or release response procedures)   | 2              |
| b. Replacement with functionally equivalent equipment, upgrade, or relocate emergency equipment listed  | 1              |
| c. Removal of equipment from emergency equipment list   | 2              |
| d. Changes in name, address, or phone number of coordinators or other persons<br>or agencies identified in the plan   | 1              |
| 7. Construction quality assurance plan:   |                |
| a. Changes that the CQA officer certifies in the operating record will provide<br>equivalent or better certainty that the unit components meet the design<br>specifications   | 1              |
| b. Other changes  | 2              |
| Note: When an Approval modification (such as introduction of a new unit) requires a change in facility plans or other general facility standards, that change shall be reviewed under the same procedures as the Approval modification. |                |
| C. Ground-Water Protection  |                |
| 1. Changes to wells:  |                |
| a. Changes in the number, location, depth, or design of up gradient or downgradient wells of the ground-water monitoring system   | 2              |
| b. Replacement of an existing well that has been damaged or rendered inoperable, without change to location, design, or depth of the well   | 1              |
| 2. Changes in ground-water sampling or analysis procedures or monitoring schedule, with prior approval of U.S. EPA  | 1 <sup>1</sup> |
|   |                |

| 3. Changes in statistical procedure for determining whether a statistically significant change in ground-water quality between up gradient and downgradient wells has occurred, with prior approval of U.S. EPA 1   4. Changes in point of compliance 2   5. Changes in indicator parameters, hazardous constituents, or concentration limits (including ACLs): 2   a. As specified in the groundwater protection standard 3   b. As specified in the detection monitoring program 2   6. Changes to a detection monitoring program, unless otherwise specified in this appendix 2   7. Compliance monitoring program: 3   a. Addition of compliance monitoring program unless otherwise specified in this appendix 3   8. Corrective action program: 3   a. Addition of a corrective action program 3   b. Changes to a corrective action program, unless otherwise specified in this appendix 2   c. Closure 3 |
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| 5. Changes in indicator parameters, hazardous constituents, or concentration limits (including ACLs): 3   a. As specified in the groundwater protection standard 3   b. As specified in the detection monitoring program 2   6. Changes to a detection monitoring program, unless otherwise specified in this appendix 2   7. Compliance monitoring program: 3   a. Addition of compliance monitoring program 3   b. Changes to a compliance monitoring program unless otherwise specified in this appendix 2   8. Corrective action program: 3   a. Addition of a corrective action program 3   b. Changes to a corrective action program 3   |
| (including ACLs):3a. As specified in the groundwater protection standard3b. As specified in the detection monitoring program26. Changes to a detection monitoring program, unless otherwise specified in this<br>appendix27. Compliance monitoring program:3a. Addition of compliance monitoring program3b. Changes to a compliance monitoring program unless otherwise specified in<br>this appendix28. Corrective action program:3a. Addition of a corrective action program3b. Changes to a corrective action program3b. Changes to a corrective action program3a. Addition of a corrective action program3b. Changes to a corrective action program, unless otherwise specified in this<br>appendix2   |
| b. As specified in the detection monitoring program 2   6. Changes to a detection monitoring program, unless otherwise specified in this appendix 2   7. Compliance monitoring program: 3   a. Addition of compliance monitoring program 3   b. Changes to a compliance monitoring program unless otherwise specified in this appendix 2   8. Corrective action program: 3   a. Addition of a corrective action program 3   b. Changes to a corrective action program 3   b. Changes to a corrective action program 3   b. Changes to a corrective action program 3  |
| 6. Changes to a detection monitoring program, unless otherwise specified in this appendix 2   7. Compliance monitoring program: 3   a. Addition of compliance monitoring program 3   b. Changes to a compliance monitoring program unless otherwise specified in this appendix 2   8. Corrective action program: 3   b. Changes to a corrective action program 3   |
| appendix 7. Compliance monitoring program: 3   a. Addition of compliance monitoring program 3   b. Changes to a compliance monitoring program unless otherwise specified in this appendix 2   8. Corrective action program: 3   a. Addition of a corrective action program 3   b. Changes to a corrective action program 2   b. Changes to a corrective action program 3   b. Changes to a corrective action program 3   b. Changes to a corrective action program, unless otherwise specified in this appendix 3  |
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| b. Changes to a compliance monitoring program unless otherwise specified in this appendix 2   8. Corrective action program: 2   a. Addition of a corrective action program 3   b. Changes to a corrective action program, unless otherwise specified in this appendix 2  |
| this appendix 8. Corrective action program:   a. Addition of a corrective action program 3   b. Changes to a corrective action program, unless otherwise specified in this appendix 2  |
| a. Addition of a corrective action program 3   b. Changes to a corrective action program, unless otherwise specified in this appendix 2  |
| b. Changes to a corrective action program, unless otherwise specified in this 2 appendix   |
| appendix   |
| D. Closure   |
|  |
| 1. Changes to the closure plan:  |
| a. Changes in estimate of maximum extent of operations or maximum inventory of waste on-site at any time during the active life of the facility, with prior approval of U.S. EPA   |
| b. Changes in the closure schedule for any unit, changes in the final closure schedule for the facility, or extension of the closure period, with prior approval of U.S. EPA   |
| c. Changes in the expected year of final closure, where other Approval conditions are not changed, with prior approval of U.S. EPA   |
| d. Changes in procedures for decontamination of facility equipment or 1 <sup>1</sup> structures, with prior approval of U.S. EPA   |
| e. Changes in approved closure plan resulting from unexpected events occurring<br>during partial or final closure, unless otherwise specified in this appendix   |

| 2. Creation of a new landfill unit as part of closure  | 3              |
|--|----------------|
| 3. Addition of the following new units to be used temporarily for closure activities:  |                |
| a. Surface impoundments  | 3              |
| b. Incinerators  | 3              |
| c. Tanks or containers (other than specified below)  | 2              |
| d. Tanks used for neutralization, dewatering, phase separation, or component separation, with prior approval of U.S. EPA                     | 1 <sup>1</sup> |
| e. Staging piles   | 2              |
| E. Post-Closure  |                |
| 1. Changes in name, address, or phone number of contact in post-closure plan   | 1              |
| 2. Extension of post-closure care period   | 2              |
| 3. Reduction in the post-closure care period   | 3              |
| 4. Changes to the expected year of final closure, where other Approval conditions are not changed  | 1              |
| 5. Changes in post-closure plan necessitated by events occurring during the active life of the facility, including partial and final closure | 2              |
| F. Containers  |                |
| 1. Modification or addition of container units:  |                |
| a. Resulting in greater than 25% increase in the facility's container storage capacity   | 3              |
| b. Resulting in up to 25% increase in the facility's container storage capacity  | 2              |
| 2. Modification of Containers  | ň              |
| a. Modification of a container unit without increasing the capacity of the unit  | 2              |
| b. Addition of a roof to a container unit without alteration of the containment system   | 1              |
| 3. Storage of different wastes in containers   |                |
| a. That require additional or different management practices from those authorized in the Approval   | 3              |
| b. That do not require additional or different management practices from those authorized in the Approval                                    | 2              |

| G. Tanks   |    |
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| 1. Modification of Tanks   |    |
| a. Modification or addition of tank units resulting in greater than 25% increase<br>in the facility's tank capacity  | 3  |
| b. Modification or addition of tank units resulting in up to 25% increase in the facility's tank capacity  | 2  |
| c. Addition of a new tank that will operate for more than 90 days using any of the following physical or chemical treatment technologies: neutralization, dewatering, phase separation, or component separation  | 2  |
| d. After prior approval of U.S. EPA, addition of a new tank that will operate for<br>up to 90 days using any of the following physical or chemical treatment<br>technologies: neutralization, dewatering, phase separation, or component<br>separation | 11 |
| 2. Modification of a tank unit or secondary containment system without increasing the capacity of the unit   | 2  |
| 3. Replacement of a tank with a tank that meets the same design standards and has a capacity within $\pm 10\%$ of the replaced tank provided   | 1  |
| -The capacity difference is no more than 1500 gallons,   |    |
| -The facility's permitted tank capacity is not increased, and  |    |
| -The replacement tank meets the same conditions in the Approval.   |    |
| 4. Modification of a tank management practice  | 2  |
| 5. Management of different wastes in tanks:  |    |
| a. That require additional or different management practices, tank design,<br>different fire protection specifications, or significantly different tank treatment<br>process from that authorized in the Approval                                      | 3  |
| b. That do not require additional or different management practices, tank design, different fire protection specifications, or significantly different tank treatment process than authorized in the Approval  | 2  |
| H. Landfills   |    |
| 1. Modification or addition of landfill units that result in increasing the facility's disposal capacity   | 3  |
| 2. Replacement of a landfill   | 3  |

| 3. Addition or modification of a liner, leachate collection system, leachate detection system, run-off control, or final cover system                        | 3 |
|--|---|
| 4. Modification of a landfill unit without changing a liner, leachate collection system, leachate detection system, run-off control, or final cover system   | 2 |
| 5. Modification of a landfill management practice  | 2 |
| 6. Landfill different wastes:  |   |
| a. That require additional or different management practices, different design of the liner, leachate collection system, or leachate detection system        | 3 |
| b. That do not require additional or different management practices, different design of the liner, leachate collection system, or leachate detection system | 2 |
| 8. Changes in response action plan:  |   |
| a. Increase in action leakage rate   | 3 |
| b. Change in a specific response reducing its frequency or effectiveness   | 3 |
| c. Other changes   | 2 |

<sup>1</sup>Class 1 modifications requiring prior U.S. EPA approval.