Permitting, Closure/Post-Closure Module

---

Highlights

Streamlined permitting event codes:
- A few new ones created;
- LOTS of superfluous ones deactivated;
- Event codes combined & conversion crosswalk developed;
Permitting, Closure/Post-Closure Module

**Highlights continued**

- Details created for nationally required event codes;
- Legal/Operating status code combinations tightened, allows Strange-But-True Occurrences;
- Permit modifications recorded via OP/PC codes;
Permitting, Closure/Post-Closure Module

*Highlights* continued

- Track post-closure activities specified by enforcement documents or a traditional post-closure permit;
- Track permit renewals, permit expiration, final permit effective and standardized permits;
- Implementer codes allowed, just not permutations of HQ codes;
Permitting, Closure/Post-Closure Module

**Highlights** continued

- New permitting reports:
  - FOIA-version of Comprehensive Report;
  - **RED** text means NOTES may contain sensitive info;
Permitting, Closure/Post-Closure Module

Highlights continued

• New permitting reports:
  – Unit Detail Notes and Unit Notes added to reports;
  – Specify current or historical leg/op status;
  – Accommodate Standardized Permits;
<table>
<thead>
<tr>
<th>Loc</th>
<th>Handler ID</th>
<th>Handler Name</th>
<th>Address</th>
<th>City</th>
<th>State</th>
<th>County</th>
<th>Active Status</th>
<th>In a Universe</th>
<th>Controls in Place</th>
</tr>
</thead>
<tbody>
<tr>
<td>SD</td>
<td>SDD000716696</td>
<td>SAFETY-KLEEN SYSTEMS, INC.</td>
<td>1000 N. WESTPORT AVE</td>
<td>SIOUX FALLS</td>
<td>SD</td>
<td>MINNEHAHA</td>
<td>HP---</td>
<td>Y</td>
<td>N</td>
</tr>
</tbody>
</table>
RCRAInfo Transaction Menu

SAFETY-KLEEN SYSTEMS, INC.  SIOUX FALLS  SDD000716896

You have selected the above handler to process. Please select an option:

1. Maintain/View Handler Data
2. Maintain/View Permitting, Closure, Post-Closure Data
3. Maintain/View Corrective Action Data
4. Maintain/View Compliance, Monitoring and Enforcement Data
5. Maintain/View Financial Assurance Data
6. Maintain/View GIS Data

Back to Main Menu  Back to Search Menu

URL: /crainfoprereprod/trans_main.jsp
What are Permitting Events?

- The permitting, closure, and post-closure module of RCRAInfo is used to record events which occur during the implementation of these requirements at a given facility (a.k.a. handler). Events include regulatory actions such as the issuance of a permit, approval of a closure or post-closure plan, and preceding events such as application reviews, public notices, etc.

Permit Series/Events

- 11 Event and Series-Unit data recommendations* incorporated into RCRAInfo v4;
- Ten of the eleven recommendations involve Events.

Permit Series

- "Series Only" data entry no longer needed -- large facilities accommodated in V4.
- Series Name now 40 characters (was 12 characters)
• V4 added a category field in the Permit Event Lookup Table for organizational purposes:
**Permit Event Codes cont’d**

Category field added to the Permit Event Lookup Table (Appendix A-5).

- **CLC**: Closure/Post Closure – Closure
- **CLP**: Closure/Post Closure – Post-Closure Plan
- **EPG**: Emergency Permit - General
Permit Event Code Categories

cont’d

- **OPG**: Operating Permit – General
- **OPC**: Operating Permit – Combustion
- **OPW**: Operating Permit – Waivers / Withdrawals
- **OPM**: Operating Permit - Modifications
Permit Event Code Categories cont’d

- **PCG**: Post-Closure – General
- **PCW**: Post-Closure – Waivers / Withdrawals
- **PCM**: Post-Closure – Modifications
- **PCA**: Post-Closure – Alternative Authority
Permit Event Code Categories cont’d

- **RDG**: RD&D Permits – General
- **RDW**: RD & D Permits – Withdrawals
- **RDM**: RD & D Permits – Modifications
- **IDG**: Implementer Defined - General
Permit Event Code Categories cont’d

- **IDG** => default category for implementer-defined codes during conversion.

- Permit Event Code resides in only one category. To find an event, all events can be viewed.
Event Codes

- National MO/MP codes converted to OP/PC codes.
- PC300 - PC414 added to post-closure track.
- PCA-PAA proposed event codes, OP020RN and PC300, included in V3.
Event Codes, cont’d

• No more permutations of HQ-defined codes. e.g. an OP200 with any other status.

• Appendix A-3 (HDD): Permit Event Codes V4 Conversion Crosswalk.
**Event Codes**

- **Data Entry for Multiple Events:**
  - streamlined, redesigned data entry screens
  - enter multiple events related to same series, units and unit detail info.

- **Pre-Populate Unit Detail Links:**
  - add event(s) to existing series,
  - unit detail links are pre-populated with same linked units as most recent event. Save or modify links.

- **Permit Unit Name:** increased to 40 characters.
Unit/Unit Details must be added during the process of entering a series or event.
PERMIT UNIT DETAILS

• Mandatory *Commercial Status* field in PUNIT_DETAIL table.
  – Default value = 0 (Does not accept waste from offsite generators).
  – Values 1, 2, and 3 as currently defined.

• If add new unit with Legal Status IS, comment required to justify IS designation.
Mandatory Linking

• **Add Unit/Unit Details** through series or event -- not through Unit/Unit Detail menu

• **Link each unit detail to 1 or more events** -- editing orphan unit or detail record requires linking to event.
Mandatory Linking cont’d

• Maintain unit detail history
  – must enter NEW unit detail record to change LE/OP status,
  – enter new by copying & editing old.
  – deleted unit details archived.
Legal/Operating Status Code Lookup Table

• Certain leg/op status combinations wouldn’t happen / don’t make sense – deactivated.

• *Strange-But-True Combinations* may apply – will be allowed, like PC/CC.

• Matrix shows deactivated leg/op status code combinations.
### DEACTIVATION CODE MATRIX

<table>
<thead>
<tr>
<th>Legal Status Codes</th>
<th>OP</th>
<th>CN</th>
<th>UC</th>
<th>BC</th>
<th>IN</th>
<th>CC</th>
<th>CP</th>
<th>CO</th>
<th>DC</th>
<th>CV</th>
<th>CR</th>
<th>AB</th>
<th>SF</th>
<th>PF</th>
<th>CA</th>
</tr>
</thead>
<tbody>
<tr>
<td>PI</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PC</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PR</td>
<td></td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td></td>
<td>√</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LI</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IT</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>PM</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LP</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NN</td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RQ</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td>√</td>
</tr>
<tr>
<td>NR</td>
<td>√</td>
<td>√</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RD</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RU</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EM</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SR</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SR</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Deactivated LE/OP Status Codes – Where to Look

• **Report: Current Unit Detail Records with Legal/Operating Status Codes that will be Deactivated** under News Alerts and General Information > RCRAInfo Documentation > Version 4 > Appendix A-7.pdf.
e-Permitting / Standardized Permit

- e-Permitting initiative (standardized permits) implemented
- Draft available under **News Alerts and General Information**.
- Standardized Permits identified as flag in Unit Detail record.
Waste Codes -- Part A Form

• V4 accommodates capture of waste codes associated with Unit Details.
Universe Calculations

Closure Workload Universe in V4

- Excludes Solid Waste Management Units (SWMUs) with zero capacity & LE/OP status PICA (Permitted / Referred to Corrective Action for Closure).

- Captures any facility with closing units -- up to verification of closure certification, except facilities which completed & verified closure or post-closure.
Universe Calculations

Post-closure Workload Universe In V4

- Excludes Solid Waste Management Units (SWM) with zero capacity and LE/OP status PICA (Permitted / Referred to Corrective Action for Closure).

- Captures facilities with closing land disposal units and storage units closing as landfills.
TRIGGERS
<table>
<thead>
<tr>
<th>Future Schedule Trigger</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Purpose</strong></td>
<td>Specify a timeline for next anticipated permitting event; activated following entry of an event reflecting approval of a document.</td>
</tr>
<tr>
<td><strong>Method of Implementation</strong></td>
<td>Implemented through a data quality report which identifies data meeting trigger requirements.</td>
</tr>
<tr>
<td><strong>Report Name / Description</strong></td>
<td>Permit Schedule Event Trigger Report: <em>lists initial permit event along side future schedule event &amp; notes where expected future event has not been scheduled.</em></td>
</tr>
</tbody>
</table>
### Data Gap Triggers

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Applies to nationally required event codes &amp; assists the user in identifying potential data gaps.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Method of Implementation</td>
<td>Implemented through data quality report which identifies data meeting the trigger requirements.</td>
</tr>
<tr>
<td>Report Name / Description</td>
<td>Permit Progress and Data Gaps Report, shows progress of individual facilities by indicating the presence or absence of nationally required operating / closure / post-closure track events based on the permit progress universe</td>
</tr>
</tbody>
</table>
## Status Triggers

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Activated by specific event which may signify change in the legal status and/or operating status for the regulated unit.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Method of Implementation</td>
<td>Implemented with 2 data quality reports; a second report evaluates LE/OP status codes which may signify a change in event.</td>
</tr>
</tbody>
</table>
| Report Name / Description | **Event - Legal & Operating Status Report** shows units with legal-operating status codes which do not agree with linked trigger events.  
**Legal and Operating Status - Event Report** shows units with events which do not agree with linked legal-operating status codes. |
Permitting Reports

• **Comprehensive Permitting Report** — all permitting data for facilities that meet the user selection criteria

• **Event – Legal and Operating Status Report** — identifies instances where the unit's current unit detail information is inconsistent with the events linked to the unit
Permitting Reports cont’d

• **Interim Status Verification Report** - a data quality report for Interim Status facilities

• **Permit Progress and Data Gaps Report** - shows the progress of individual facilities by indicating the occurrence nationally required closure, postclosure or operating track events based on the permit progress universe.
Permitting Reports cont’d

- **Permit Schedule Event Trigger Report** – data quality report that provides a review of projected events for unit groups

- **Process Report** - This report lists detailed data for the individual unit groups within a TSD facility
Permitting Reports cont’d

• **Deactivation LE/OP Status Report** - used to assist users to change the deactivated legal/operating status to an active legal/operating status combination.
Permitting, Closure/Post-Closure Module

Now it’s your turn!

Good luck and have fun!