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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

NOVEMBER 88

5. Contents of Part B Permit Application: General Requirements

The Part B of the permit application must contain general information requirements. One of these requirements is information on the traffic pattern, estimated volume and control of traffic, descriptions of access road surfacing, and load bearing capacity of roads (Section 270.14(b)(10)).

Why is this information required?

Is the information limited to on-site traffic, or must the traffic patterns surrounding the facility also be described?

The intent of requiring submittal of the traffic related information is to ensure that movement of hazardous waste will be conducted safely to minimize the risk of accidents. The traffic related information is only required for that area inside and immediately surrounding the hazardous waste management facility.

There are no standards in Part 264 with which traffic related items must comply. However, the overriding concern is safety. Permit applicants should ensure that the movement of waste into, out of, and within the facility will be conducted in a manner that minimizes accident potential. Additionally, general traffic movement should not be such that hazardous waste managed at the facility will be disturbed by the traffic. In order to present traffic related items effectively, the Agency recommends that both a discussion and a drawing be provided with the Part B permit.

Permit applicants should provide a thorough description of both the pattern of general traffic and the pattern of traffic moving hazardous waste within the facility. The applicant should also provide a description of traffic on roadways traveled by the public with intersect with access roadways to the facility. The patterns and volumes: routes traveled; distances traveled; number of vehicles; types of vehicles; waste movement; sampling and unloading locations; and amount of pedestrian traffic.

Permit applicants are also required to submit a description of roadway surfaces and load bearing capacity. The intent here is to insure that the roadways are appropriate for the type and number of vehicles that will be using them. If the road surface is such that it will require periodic maintenance, the frequency and type of maintenance could also be described. Finally, the reviewing agency may also be concerned with the amount of dust that will be generated by vehicular traffic in and around the facility.

Source: Permit Applicant's Guidance Manual for the General Facility
Standards of Part 264
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