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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MARCH 83

3. Question: An interim status facility wishes to add a new hazardous waste management unit. Is this new unit subject to the 264.18 seismic standards if the unit can be added according to 122.23(c)(3) and (5)? Is the new unit subject to 264.18 if the owner/operator has exceeded reconstruction costs and has to submit a full permit application for the unit?

Answer: (1) If the change can be made during interim status, the unit is not subject to the seismic standards. The definition of existing facility is satisfied, and a facility can have several units. (2) Part 264.18 applies to new facilities, and this unit is still part of an existing facility.

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