

## Permit Application and Renewal

In order to treat, store, or dispose of hazardous waste, a facility owner or operator must apply for and receive a RCRA permit. Once a RCRA permit has been approved, it is valid for a period of up to ten years (40 CFR 270.50). If an owner/operator wishes to continue an activity regulated by the permit after its expiration date, the owner/operator must apply for and obtain a new permit (270.30(b)). What are the application requirements for obtaining or renewing a hazardous waste permit?

To obtain the original hazardous waste permit, the owner/operator must submit a two part application, consisting of part A and part B. The part A (form 8700-23) requires owners/operators to supply basic information such as facility name and address, description of hazardous waste processes, and topographical maps. For the part B, owners/operators must fulfill the information requirements of 270.14-29. These sections require an owner/operator to detail, in a narrative format, how they will demonstrate compliance with the general TSD standards, as well as the unit-specific requirements (270.1(b)).

When an owner/operator reapplies for a hazardous waste permit, the owner/operator must submit a permit application, including parts A and B, revised as necessary to reflect changed conditions since the previous application. The revised part B should: fulfill all the requirements of a new permit application; incorporate any new regulations that were promulgated or came into effect since the issuance of the permit; and include any approved permit modifications.

The owner/operator may continue operation under the existing permit beyond the permit's expiration date while the renewal application is being considered if the owner/operator submits the revised part B at least 180 days before the expiration date of the existing permit (270.10(h)) and the Regional Administrator, through no fault of the permittee, does not issue a permit with an effective date on or before the expiration date of the existing permit (270.51(a)). Failure to file a timely application would require the owner/operator to cease operations under the expired permit and apply, as a new applicant, for a new hazardous waste permit. (September 1994 Monthly Hotline Report)