

9476.1985(01)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 85

Partial Closure

3. The owner/operator (o/o) of a permitted facility plans to remove a tank from service. His permit does not address removal of the tank. Must the permit be modified to reflect this tank removal?

Removing the tank would constitute partial closure of the facility. The closure plan should address this situation according to §264.112(a)(1). Since the permit does not cover partial closure, the o/o must amend his plan. Section 264.112(b) requires the o/o to amend his plan whenever changes in operating plans (e.g., tank removal) affect the closure plan. To amend the closure plan to address partial closure, the o/o must comply with the standards for major modifications for permits under §270.41. The o/o should amend his plan to address all anticipated partial closures so that he needed only modify his permit once.

Source: Susan Hughes (202) 382-4790