

9523.1987(03)

## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

NOVEMBER 87

### 2. Exposure Information Requirements

Section 270.10(j) requires that exposure information accompany Part B applications for landfills or surface impoundments. Is submission of exposure information a condition for permit issuance? What should the exposure information include?

No. Section 270.10(c) states that an application for a Part B permit is not considered incomplete if the owner or operator fails to submit the exposure information described in Section 270.10(j). Failure to submit exposure information is a separate violation of Section 3019 of RCRA.

At a minimum, the exposure information should address all potential pathways of human exposure to hazardous wastes or constituents resulting from releases during accidents and normal operations, including releases associated with transportation to or from the unit. These pathways include ground-water, surface water, air emissions, food chain contamination, and multi-media contamination. The potential magnitude and nature of the human exposure which may result from the releases should also be addressed.

Source: Bob Kayser (202) 382-4536  
Research: Tish Zimmerman