

PPC 9523.1984(07)

GWM DATA IN PART B APPLICATIONS

PERMIT POLICY Q & A REPORT

DEFINITION

SEPTEMBER 10, 1984

2. Question: Can EPA declare a Part B application complete even though the applicant has not submitted ground-water monitoring (GWM) data? 40 CFR 264 Subpart F and 40 CFR 270.14(c)

Answer: No. The Agency cannot declare a permit application complete without ground water monitoring data. The Agency can use enforcement to secure facilities' compliance with Part 265 ground water monitoring requirements, §3013 orders if a substantial hazard is suspected, and the authority of 40 CFR 270.14(c) to obtain the necessary ground water monitoring information. More detailed guidance on this issue will be issued shortly.