

**GENERAL GUIDELINES
ADDRESSING THE
CONTENT AND FORMATING
FOR A HAZARDOUS WASTE PERMIT APPLICATION**

1.0 BACKGROUND

A hazardous waste permit application consists of two parts. Part I requirements are listed in LAC 33:V.515 and Part II requirements are listed in LAC 33:V.517.

Any person who is required to have a permit (including new applicants and permittees with expiring permits) shall complete, sign, and submit an application to the administrative authority as described in LAC 33:V. Chapter 3 and Chapter 5, and LAC 33:V.4301, 4303, and 4305. The administrative authority shall not begin the processing of a permit until the applicant has fully complied with the application requirements for that permit.

The applicant must address all of the hazardous waste regulations as required by the administrative authority. The administrative authority may require a permittee or applicant to submit relevant information in order to establish permit conditions under LAC 33:V.311.E and 315. The administrative authority shall not issue a permit before receiving a complete application for a permit except for permits by rule, or emergency permits. An application for a permit is complete when the administrative authority receives an application form and any supplemental information which are completed to his or her satisfaction.

Failure to furnish a requested Part B/II application on time, or to finish in full the information required by the Part II application, is grounds for termination of interim status under LAC 33:V. Chapter 43. Applications which lack information necessary for proper evaluation will be returned by the administrative authority to the operator within 60 days of receipt of application with a list of additional data required and the timeframe for submission of additional data.

2.0 PART A/I REQUIREMENTS AND CONTENTS

All applicants for TSD (Treatment, Storage and Disposal) permits shall provide the following information to the administrative authority using the application form provided. Other formatting requirements may be specified by the administrative authority.

1. date of application;
2. EPA identification number;
3. a brief description of the nature of the business;
4. the activities conducted by the applicant which require it to obtain a TSD permit;
5. name, mailing address, and location of the facility for which the application is submitted;
6. the latitude and longitude of the facility and a legal description of the site;
7. up to four SIC (Standard Industrial Classification) codes which best reflect the principal products or services provided by the facility;
8. an indication of whether the facility is new or existing and whether it is a first or revised application;
9. the operator's name, address, telephone number, ownership status, and status as federal, state, private, public, or other entity;
10. owner's name, address, and phone number if different from operator's;
11. contact: name of individual to be contacted concerning hazardous waste management;
12. telephone number of contact;
13. whether the facility is located on Indian lands;
14. a listing of all permits or construction approvals received or applied for under any of the following programs:
 - a. hazardous waste management program;
 - b. Underground Injection Control (UIC) program;
 - c. National Pollution Discharge Elimination System (NPDES) program;
 - d. Prevention of Significant Deterioration (PSD) program under the Federal Clean Air Act;
 - e. non-attainment program under the Clean Air Act;
 - f. National Emission Standards for Hazardous Air Pollutants (NESHAP) preconstruction approval under the Clean Air Act;
 - g. ocean dumping permits under the Marine Protection Research and Sanctuaries Act;
 - h. dredge or fill permits under section 404 of the federal Clean Water Act (CWA); or
 - i. other relevant environmental permits;

15. a topographic map (or other map if a topographic map is unavailable) extending two miles beyond the property boundaries of the facility indicating the following; each hazardous waste treatment, storage, and disposal facility; each well where fluids from the facility are injected underground; and those wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant;
16. for existing facilities, a scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas;
17. for existing facilities, photographs of the facility clearly delineating all existing structures; existing treatment, storage, and disposal areas; and sites of future treatment, storage, and disposal areas;
18. a description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items;
19. a specification of the hazardous wastes listed or designated to be treated, stored, or disposed of at the facility; an estimate of the quantity of such wastes to be treated, stored, or disposed of annually; and a general description of the processes to be used for such wastes;
20. status: ownership status of existing site or land for proposed site (federal, state, private, public, other);
21. operation status;
22. list other company hazardous waste operations in Louisiana (permitted or non-permitted and current or abandoned);
23. list other states in which hazardous waste operations are or have been conducted;
24. zoning of site, if applicable;
25. for hazardous debris: a description of the debris category(ies) and contaminant category(ies) to be treated, stored, or disposed of at the facility; and
26. other information required in LAC 33:I.1701; and
27. comments.

3.0 PART B/II FORMAL PERMIT APPLICATION CONTENTS

The formal permit application information requirements presented in LAC 33:V.Chapter 5 reflect the standards promulgated in LAC 33:V.Subpart 1. These information requirements are necessary in order to determine compliance with all standards. Responses and exhibits shall be numbered sequentially according to the technical standards. The permit application must describe how the facility will comply with each of the sections of LAC 33:V.Chapters 15-37 and 41. Information required in the formal permit application shall be submitted to the administrative authority and signed in accordance with requirements in LAC 33:V.509. The description must include appropriate design information (calculations, drawings, specifications, data, etc.) and administrative details (plans, flow charts, decision trees, manpower projections, operating instructions, etc.) to permit the administrative authority to determine the adequacy of the hazardous waste permit application. Certain technical data, such as design drawings, specifications, and engineering studies, shall be certified by a registered professional engineer. If a section does not apply, the permit application must state it does not apply and why it does not apply. This information is to be submitted using the same numbering system and in the same order used in the hazardous waste regulations.

4.0 PERMIT APPLICATION FORMAT

4.1. General Information

The formal permit application must follow all outline, numbering system, and other format requirements established by the administrative authority (LAC 33:V.303.F). The format requirements are denoted in LAC 33:V.517 which states that the information is to be submitted using the same numbering system and in the same order used in the Louisiana Hazardous Waste Regulations (Environmental Regulatory Code, Part V., Hazardous Waste and Hazardous Materials). Responses and exhibits shall be numbered sequentially according to the technical standards.

4.2. Permit Format

The complete permit application (Part A/I and B/II, Supplemental Information, Plans, etc.) is to be prepared in compliance with the requirements specified by the Louisiana Hazardous waste regulations and the administrative authority. The application format has been designed to expedite the agency's permitting review process. The format allows an abundance of pertinent information to be compiled and submitted in a concise and comprehensible manner. It also aids in making the information easier to review for the public. **(Note: This information is to be submitted using the same numbering system and in the same order used in the hazardous waste regulations.)**

Failure to submit the application in accordance with the specified requirements could result in delays in the permit review process; the application being deemed incomplete; or denial of the permit and termination of a facility's interim status classification.

The applicant should submit the application in accordance with the format provided below.

1. Cover letter. Briefly address specific details as they pertain to the purpose of the permit application submittal.
2. Part A/I application. Respond completely to the twenty-six (27) categories specified in the Louisiana Hazardous Waste regulations.
3. Table of contents. List each of the regulatory chapters (1-53), sections and the page(s) on which they are located within the application. Also list the names of the appendices where any specific supplemental information, descriptions, documents, maps, or plans are provided in the application.
4. Louisiana Hazardous Waste Regulation Citations and Responses. Chapters 1-53 language citations and the corresponding responses to the sections and subsections contained within the chapters. **(Note: If a section does not apply, the permit application must state it does not apply and why it does not apply.)**
5. Appendices. This portion of the application contains any maps (topographic, flood, etc.), plans (waste analysis, contingency, closure/post-closure, waste minimization, etc.), or supplemental information ("IT Decision" questions and

responses, additional data, drawings, reports, etc.) that are required by the regulations and/or the administrative authority.

6. Section Dividers/Tabs. The designated portions of the application are to be separated by section dividers. Tabs should also be utilized to clearly denote and identify each of the chapters and appendices.
7. Information that is referenced in the application must be specifically identified. The precise location (include the appendix, chapter, figure, map, plan, section, table and page number) of the referenced information should be provided within the context of the response. **Simply stating that the information is contained within the application is not sufficient.** The applicant's failure to provide clearly denoted descriptions, information and responses contributes to an increase in the number of inadequacies in the application. It also results in the issuance of a notice of deficiencies identifying the administrative and technical inadequacies in the permit application.
8. All drawings and maps should be properly and clearly identified. They must provide the information specifically requested by the regulations and comply with the scale requirements designated by the regulations.
9. All plans should be contained in the appendices portion of the application as separate documents. They must provide the specific information denoted by the regulations. Failure to supply the information stipulated by the regulations in the plans will result in the plan being deemed technically inadequate and the issuance of a notice of deficiencies identifying those technical inadequacies.