Appendix A

Approval Modification Classifications TSCA Approval US Ecology Nevada, Inc.

Appendix A - Approval Modification Classifications

Modifications	Class
A. General Approval Provisions	
Administrative and informational changes	1
2. Correction of typographical errors	1
3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls)	1
4. Changes in the frequency of or procedures for monitoring, reporting, sampling, or maintenance activities by US Ecology:	
a. To provide for more frequent monitoring, reporting, sampling, or maintenance	1
b. Other changes	2
5. Schedule of compliance/construction:	
a. Changes in interim compliance dates, with prior approval of U.S. EPA	1 ¹
b. Extension of final compliance date	3
6. Changes in expiration date of Approval to allow earlier termination, with prior approval of U.S. EPA	1 ¹
7. Changes in ownership or operational control of a facility	1 ¹
8. Changes to remove Approval conditions that are no longer applicable (<i>i.e.</i> , because the standards upon which they are based are no longer applicable to the facility).	1 ¹
B. General Facility Standards	
1. Changes to waste sampling or analysis methods:	
a. To conform with agency guidance or regulations	1
b. To incorporate changes associated with F039 (multi-source leachate) sampling or analysis methods	1
c. To incorporate changes associated with underlying hazardous constituents in ignitable or corrosive wastes	1 ¹
d. Other changes	2

2. Changes to analytical quality assurance/control plan:	
a. To conform with agency guidance or regulations	1
b. Other changes	2
3. Changes in procedures for maintaining the operating record	1
4. Changes in frequency or content of inspection schedules	2
5. Changes in the training plan:	
a. That affect the type or decrease the amount of training given to employees	2
b. Other changes	1
6. Contingency plan:	**
a. Changes in emergency procedures (i.e., spill or release response procedures)	2
b. Replacement with functionally equivalent equipment, upgrade, or relocate emergency equipment listed	1
c. Removal of equipment from emergency equipment list	2
d. Changes in name, address, or phone number of coordinators or other persons or agencies identified in the plan	1
7. Construction quality assurance plan:	
a. Changes that the CQA officer certifies in the operating record will provide equivalent or better certainty that the unit components meet the design specifications	1
b. Other changes	2
Note: When an Approval modification (such as introduction of a new unit) requires a change in facility plans or other general facility standards, that change shall be reviewed under the same procedures as the Approval modification.	
C. Ground-Water Protection	
1. Changes to wells:	
a. Changes in the number, location, depth, or design of up gradient or downgradient wells of the ground-water monitoring system	2
b. Replacement of an existing well that has been damaged or rendered inoperable, without change to location, design, or depth of the well	1
2. Changes in ground-water sampling or analysis procedures or monitoring schedule, with prior approval of U.S. EPA	1 ¹
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3. Changes in statistical procedure for determining whether a statistically significant change in ground-water quality between up gradient and downgradient wells has occurred, with prior approval of U.S. EPA	11
4. Changes in point of compliance	2
5. Changes in indicator parameters, hazardous constituents, or concentration limits (including ACLs):	
a. As specified in the groundwater protection standard	3
b. As specified in the detection monitoring program	2
6. Changes to a detection monitoring program, unless otherwise specified in this appendix	2
7. Compliance monitoring program:	
a. Addition of compliance monitoring program	3
b. Changes to a compliance monitoring program unless otherwise specified in this appendix	2
8. Corrective action program:	
a. Addition of a corrective action program	3
b. Changes to a corrective action program, unless otherwise specified in this appendix	2
D. Closure	
1. Changes to the closure plan:	-
a. Changes in estimate of maximum extent of operations or maximum inventory of waste on-site at any time during the active life of the facility, with prior approval of U.S. EPA	11
b. Changes in the closure schedule for any unit, changes in the final closure schedule for the facility, or extension of the closure period, with prior approval of U.S. EPA	11
c. Changes in the expected year of final closure, where other Approval conditions are not changed, with prior approval of U.S. EPA	1 ¹
d. Changes in procedures for decontamination of facility equipment or structures, with prior approval of U.S. EPA	1 ¹
e. Changes in approved closure plan resulting from unexpected events occurring during partial or final closure, unless otherwise specified in this appendix	2

2. Creation of a new landfill unit as part of closure	3
3. Addition of the following new units to be used temporarily for closure activities:	
a. Surface impoundments	. 3
b. Incinerators	3
c. Tanks or containers (other than specified below)	2
d. Tanks used for neutralization, dewatering, phase separation, or component separation, with prior approval of U.S. EPA	1 ¹
e. Staging piles	2
E. Post-Closure	
1. Changes in name, address, or phone number of contact in post-closure plan	1
2. Extension of post-closure care period	2
3. Reduction in the post-closure care period	3
4. Changes to the expected year of final closure, where other Approval conditions are not changed	1
5. Changes in post-closure plan necessitated by events occurring during the active life of the facility, including partial and final closure	2
F. Containers	
1. Modification or addition of container units:	
a. Resulting in greater than 25% increase in the facility's container storage capacity	3
b. Resulting in up to 25% increase in the facility's container storage capacity	2
2. Modification of Containers	
a. Modification of a container unit without increasing the capacity of the unit	2
b. Addition of a roof to a container unit without alteration of the containment system	1
3. Storage of different wastes in containers	
a. That require additional or different management practices from those authorized in the Approval	3
b. That do not require additional or different management practices from those authorized in the Approval	2
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G. Tanks	
1. Modification of Tanks	
a. Modification or addition of tank units resulting in greater than 25% increase in the facility's tank capacity	3
b. Modification or addition of tank units resulting in up to 25% increase in the facility's tank capacity	2
c. Addition of a new tank that will operate for more than 90 days using any of the following physical or chemical treatment technologies: neutralization, dewatering, phase separation, or component separation	2
d. After prior approval of U.S. EPA, addition of a new tank that will operate for up to 90 days using any of the following physical or chemical treatment technologies: neutralization, dewatering, phase separation, or component separation	1 ¹
2. Modification of a tank unit or secondary containment system without increasing the capacity of the unit	2
3. Replacement of a tank with a tank that meets the same design standards and has a capacity within $\pm 10\%$ of the replaced tank provided	1
-The capacity difference is no more than 1500 gallons,	
-The facility's permitted tank capacity is not increased, and	
-The replacement tank meets the same conditions in the Approval.	
4. Modification of a tank management practice	2
5. Management of different wastes in tanks:	
a. That require additional or different management practices, tank design, different fire protection specifications, or significantly different tank treatment process from that authorized in the Approval	3
b. That do not require additional or different management practices, tank design, different fire protection specifications, or significantly different tank treatment process than authorized in the Approval	2
I. Landfills	
Modification or addition of landfill units that result in increasing the facility's disposal capacity	3
2. Replacement of a landfill	3

3. Addition or modification of a liner, leachate collection system, leachate detection system, run-off control, or final cover system	3
4. Modification of a landfill unit without changing a liner, leachate collection system, leachate detection system, run-off control, or final cover system	2
5. Modification of a landfill management practice	2
6. Landfill different wastes:	
a. That require additional or different management practices, different design of the liner, leachate collection system, or leachate detection system	3
b. That do not require additional or different management practices, different design of the liner, leachate collection system, or leachate detection system	2
8. Changes in response action plan:	
a. Increase in action leakage rate	3
b. Change in a specific response reducing its frequency or effectiveness	3
c. Other changes	2

¹Class 1 modifications requiring prior U.S. EPA approval.