

Appendix A

Approval Modification Classifications

TSCA Approval

US Ecology Nevada, Inc.

Appendix A - Approval Modification Classifications

Modifications	Class
<i>A. General Approval Provisions</i>	
1. 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 Changes to remove Approval conditions that are no longer applicable (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 , because the standards upon which they are based are no longer applicable to the facility).	1 ¹
<i>B. General Facility Standards</i>	
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.	
<i>C. Ground-Water Protection</i>	
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

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	1 ¹
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
<i>D. Closure</i>	
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	1 ¹
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	1 ¹
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
<i>E. Post-Closure</i>	
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
<i>F. Containers</i>	
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

<i>G. Tanks</i>	
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>H. Landfills</i>	
1. 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.