Types of OB/OD RCRA Permit Conditions

General permit conditions applicable to all permits

- All RCRA permits generally have conditions that address the following:
  - General facility standards (e.g., waste analysis, security, inspections, training, requirements for ignitable-reactive-incompatible wastes, location standards)
  - Preparedness/prevention
  - Contingency plan and emergency procedures
  - Recordkeeping/reporting
  - Corrective action/site remediation of contaminated media

Types of OB/OD RCRA Permit Conditions

General permit conditions applicable to all permits

- General permit conditions applicable to all permits (continued)
  - Closure/post closure
  - Financial assurance
  - Use and management of tanks/containers
  - Many other requirements based on the specific operations and design of the facility

Types of OB/OD RCRA Permit Conditions

RCRA Permit Conditions Specific for Open Burn/Open Detonation

- Treatment operations such as OB/OD that do not have specific regulatory design/operation requirements must be permitted pursuant to 40 CFR 264, Subpart X requirements
- Subpart X stipulates that permits for these "miscellaneous units" must contain terms and provisions as necessary to protect human health and the environment
- This includes permit conditions that generally cover requirements applicable to:

Types of OB/OD RCRA Permit Conditions

RCRA Permit Conditions Specific for Open Burn/Open Detonation

- Treatment unit design, operation, and monitoring
- Prevention of releases to ground, surface water and air that pose unacceptable risk
- Responses to releases of hazardous waste or hazardous constituents

- OB/OD permit limits differ and are site-specific
  - However, all permits must ensure protection of human health and the environment
- The following slides list example OB/OD operating conditions from permits – each permit will not necessarily include all these requirements

OB/OD RCRA Permit Operating Conditions

Example Operating Conditions for Open Burn/Open Detonation:

- Waste restrictions (e.g. energetic/reactive waste only, on-site generated waste only)
- Daily/annual/event limits on amount OB/OD'd
  - Some have waste concentration limits
- Days/hours of operation restrictions
  - # of days per week, during daylight hours only
- Weather condition restrictions
  - Wind speed, rain forecast, lightening, etc.
  - Some prohibit operations on O_3 action days

Types of OB/OD RCRA Permit Conditions

Example Operating Conditions for Open Burn/Open Detonation:

- Fire hazard managers required on scene
- Periodic soil, groundwater monitoring
- Requirements specific to risk thresholds
  - Operations shall not cause carcinogenic risk of $1X10^{-6}$ to be exceeded at offsite locations
  - Operations shall not cause noncarcinogenic chronic hazard index of 1.0 to be exceeded at offsite locations
  - Some permits require periodic assessments of the info used to model pollutant transport and risk, including emission factors and appropriateness of risk determination assumptions

Types of OB/OD RCRA Permit Conditions

Example Operating Conditions for Open Burn/Open Detonation:

- Notification requirements, access restrictions
  - Siren, clearing nearby river of boaters, etc.
  - Signs, gates, surveillance teams
  - Public complaint procedures
- Clearing dry grass, leaves, and other combustibles
- Water run on/off controls (stormwater control)
- Pre and post burn/detonation inspections
- Spilled waste management requirements

Types of OB/OD RCRA Permit Conditions

Example Operating Conditions for Open Burn/Open Detonation:

- Example operating conditions specific to Open Detonation
  - Management/retrieval of kickout
  - Munition burial depth prior to detonation
  - Noise restrictions
  - Waste transport requirements
  - Donor charge requirements
  - Unit maintenance (e.g., wetting)
  - Minimum protective distances

Types of OB/OD RCRA Permit Conditions

Example Operating Conditions for Open Burn/Open Detonation:

- Example operating conditions specific to OB
  - Burn pad design (height, refractory design, precipitation covers, waste kept below critical height to prevent detonation)
  - Hazardous waste shall not be used as burn pan accelerants
  - Burn box shall remain closed when waste is not being burned/treated
- Some permits require periodic assessments of the availability of alternatives to OB/OD