

RCRA Permitting Process - Functions, Sub Functions, and Best Practices

Function	Sub Function	Best Practice
1.0 Notification	<p>1.1 Facility notifies agency of intent to apply for new permit</p> <p>0.2 Facility notifies agency of intent to renew permit</p> <p>1.2 Facility prepares notification form</p> <p>1.3 Facility submits notification form to agency</p> <p>1.4 Agency receives notification form</p> <p>1.4.1 Agency processes notification form</p> <p>1.5 Agency checks compliance history</p>	<p>E-mail</p> <p>-Completes fill-in forms online</p> <p>-When a user inserts data directly into the form, it automatically verifies, reformats, & calculates data as it is filled in</p> <p>-Downloads fill-in forms, saves the forms on a PC for completion at a later time</p> <p><u>Submits electronic data</u></p> <p>-Applicant must demonstrate his/her intent and authorization by entering his/her password and then pressing the submit button</p> <p>-Application displays confirmation of the data submission including the confirmation number and hash code</p> <p>-Electronic submittal results in an XML copy of record (COR). The COR contains the data, identifying tags, who submitted the data, the IP address from where it was submitted, and the confirmation number and hash code generated from the submitted data</p> <p>Submits paper copy, CD, or diskette</p> <p><u>Receipt of electronic data, the system processes the data as follows:</u></p> <p>-Checks the master file to determine if the facility is already in system, & updates the information, if appropriately</p> <p>-Performs virus check on the incoming data file</p> <p>-Runs clean-up macros to eliminate any stray codes and places data in a format for loading into the system</p> <p>-Loads data into the database when the form data is free from errors</p>
2.0 Pre-Application Meeting	<p>2.1 Facility has pre-application meeting</p> <p>2.2 Facility provides agency with meeting summary, list of attendees, and written comments</p> <p>2.3 Agency prepares public mailing list</p>	<p>Posts announcement on agency website</p> <p>-E-mail</p> <p>-Posts meeting summary and written comments on agency website</p> <p>System generates mailing list</p>

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4.0 Receiving Application	4.1 Agency receives application 4.1.1 Agency processes application 4.1.2 Agency establishes public participation schedule 4.2 Agency issues letter acknowledging receipt of application 4.3 Agency conducts completeness review 4.4 Agency determines if application is complete?	<p><u>Receipt of electronic data, the system processes the data as follows:</u></p> <ul style="list-style-type: none"> -Checks the master file to determine if the facility is already in system, & updates the information, if appropriate -Performs virus check on the incoming data file -Runs clean-up macros to eliminate any stray codes and places data in a format for loading into the system -Loads data into the database when the form data is free from errors <p><u>Receipt of paper copy application, the system processes the data as follows:</u></p> <ul style="list-style-type: none"> -Scans the application -Converts the form data to a format that can easily be directly loaded into the system -Runs clean-up macros on the data -Loads the data directly into the system <ul style="list-style-type: none"> -System generates a schedule for public participation activities <ul style="list-style-type: none"> -System automatically generates letter -Uses query language to read and extract data for incorporation into letters sent to applicants <ul style="list-style-type: none"> -Flowchart federal/state rules to aid in categorizing individual requirements (standards, monitoring, recordkeeping, and reporting) and serve as a tool for the permit writer to determine requirements based on specific sets of operating conditions for an individual unit -Incorporates the logic of the developed spreadsheets such that for each set of operating parameters submitted by the applicant, the database will automatically identify the corresponding set of requirements based on agency determinations -The spreadsheet(s) are available for viewing or printing -The database also contains a feature such that determinations made and submitted by applicants in the application and agency determinations can be compared and discrepancies identified -Once discrepancies have been resolved, data is copied to the permit area of the database

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4.0 Receiving Application (Cont'd)	4.5 Agency contacts facility for additional information	-Uses query language to read and extract data for incorporation into letters sent to applicants
	4.6 Facility submits additional information	<ul style="list-style-type: none"> -Allows the applicant to submit additional information directly into the original electronic application -Whenever the applicant logs into the system, the system displays the date and time of the most recent logons -The applicant must declare that all of those logons were his/hers or admit that they were not his/hers -If the logon was not conducted by the applicant, the account is disabled and the applicant must contact the help line
	4.7 Agency conducts technical review	<ul style="list-style-type: none"> -Permit writer evaluates each section of the application based on type and volume of HW -For example, type and volume of HW determines type of storage container and storage practices for safe storage of each category of HW
	4.8 Agency determines if application is technically acceptable?	
	4.9 Agency issues notice of completeness letter	System automatically generates letter
	4.10 Agency requests additional information	<ul style="list-style-type: none"> -System automatically generates letter -Uses query language to read and extract data for incorporation into letters sent to applicants
4.11 Facility submits additional information	<ul style="list-style-type: none"> -Allows the applicant to submit additional information directly into the original electronic application -Whenever the applicant logs into the system, the system displays the date and time of the most recent logons -The applicant must declare that all of those logons were his/hers or admit that they were not his/hers -If the logon was not conducted by the applicant, the account is disabled and the applicant must contact the help line 	

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5.0 Draft Permit	5.1 Will the agency draft a permit?	NA ¹
	5.2 Agency drafts permit	<ul style="list-style-type: none"> -Interactive Permit Builder template using flowcharting of state/federal rules (similar to 4.3) to determine both general and special terms and conditions to be contained within the permit -Uses query language to read and extract data from the application (data within the application has previously been stored within the database) -Initiates a macro on the extracted information in order to place the data in the correct permit format. -Includes an audit function that logs each change to data as the change is made -Audit function notes the user initiating the change, the date the change was made, the data that was entered, and the project in which the change was initiated
	5.3 Agency sends preliminary copy of permit to facility	E-mail, standard mail
	5.4 Agency issues notice of intent to deny permit	<ul style="list-style-type: none"> -System automatically generates letter -Uses query language to read and extract data for incorporation into letters sent to applicants

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6.0 Public Participation ²	6.1 Agency publishes public notice	-Uses query language to read and extract data for incorporation into public notice packages -Posts public notice on agency website
	6.1.1 Application available for public review	Posts application on agency website
	6.1.2 Preliminary copy of permit available for public review	Posts preliminary copy of permit on agency website
	6.1.3 Notice of intent to deny permit available for public review	Posts notice of intent to deny permit on agency website
	6.2 Public submits comments	Online submittal and receipt
	6.3 Agency receives public comments	E-mail, standard mail
	6.4 Agency reviews public comments	NA ¹
	6.5 Agency determines whether to hold a public hearing?	NA ¹
	6.5.1 Agency notifies public of meeting	Posts announcement on agency website
	6.6 Agency holds public hearing	NA ¹
	6.7 Agency reviews comments from hearing	NA ¹
	6.8 Agency responds to public comments	E-mail, standard mail
	6.8.1 Agency posts public comments and responses	Posts comments and responses on agency website

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Function	Sub Function	Best Practice
7.0 Permit Decision	7.1 Will the agency issue a final permit?	NA ¹
	7.2 Agency prepares final permit	-Interactive Permit Builder template using flowcharting of state/federal rules (similar to 4.3) to determine both general and special terms and conditions to be contained within the permit -Uses query language to read and extract data from the permit within the database -Initiates a macro on the extracted information in order to place the data in the correct permit format. -Includes an audit function that logs each change to data as the change is made -Audit function notes the user initiating the change, the date the change was made, the data that was entered, and the project in which the change was initiated
	7.3 Agency issues final permit	-E-mail or standard mail -Posts permit on agency's website
	7.4 Agency denies permit	-System automatically generates letter
	7.4.1 Agency issues denial letter	-Uses query language to read and extract data for incorporation into letters sent to applicants
	7.5 Does the public or facility file for a permit appeal?	NA ¹
	7.6 Agency processes permit appeal	NA ¹
	7.7 Agency issues final permit after permit appeal	E-mail, standard mail
7.8 Final permit remains after permit appeal	Posts permit on agency website	

1 – This is an activity or decision point that does not require a best practice

2 – Public Participation function (6.0) supports functions 2.0, 4.0, 5.0, and 7.0