

**Texas Commission on Environmental Quality
Remediation Division
Closure Report Checklist**

Title 30 of the Texas Administration Code (TAC) §335.8, establishes the obligation for persons to perform closure of waste management units (WMUs) used to store industrial solid waste or municipal hazardous waste. Closure is the act of permanently taking a WMU out of service. In order to close a WMU, a person must remove all waste from the WMU and demonstrate that a release from the WMU to the environment has not occurred. If a release has occurred, refer to 30 TAC 350 and the guidance memo, "Determining Which Releases are Subject to TRRP".

The Texas Commission on Environmental Quality (TCEQ), Remediation Division developed this checklist to assist persons in preparing a closure report for units listed on the facilities Notice of Registration (NOR). This checklist should not be used for Resource Conservation and Recovery Act (RCRA) units (permitted or interim status). Persons/Facilities that are in the TCEQ's Corrective Action (CA) or Voluntary Cleanup Program (VCP) should close/transfer all WMUs for properties which will change ownership. Persons/Facilities that are in CA or VCP which will remain active should investigate land-based WMUs for possible releases. Closure reports submitted to the Remediation Division should include the following general information:

- Owner / operator information and hard copy of the Notice of Registration (NOR),
- Location of facility (address, city),
- Description of the WMU, including NOR No., construction, condition, operational history, waste(s) managed, waste characterization results (process knowledge or analytical results), and any waste spill(s) and cleanup response(s),
- Reason for the WMU closure (for example, facility closing, TCEQ inspection),
- A map of the facility showing the WMU location,
- Description of how the WMU was closed and demonstrated to not have released to the environment,
- Color photographs with descriptions of the WMU before, during, and following closure, and a
- Description of the WMU and waste dispositions, including copies of waste manifest, if applicable.

Other supporting documentation may include completed facility inspection logs and maintenance reports.

For less-than 90-day containers, also provide a discussion that demonstrates the container(s) was empty in accordance with 40 Code of Federal Regulations §261.7.

For less-than 90-day tanks, also provide a discussion of the decontamination process including analytical results for rinsate or wipe samples.

If any samples were collected, submit the following:

- Description of sample (rinsate, soil, etc.),
- Reports of chemical analyses, chain of custody forms and QA/QC data,
- Summary table of analytical results, and a
- Map that shows the sampling locations.

For WMUs which are below ground or in direct contact with the ground surface (for example, surface impoundments, landfills, underground storage tanks, sumps) soil samples are required for release determination and closure. Closure reports submitted to the Remediation Division should include the following:

- Soil sample depths and description of soil surrounding WMU,

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- Table of analytical results. Investigation sample results should be compared to the appropriate regulatory values (e.g. residential assessment level or background),
- Map that shows borings or sampling locations demonstrating extent of COCs, if any,
- Depth and construction details of WMU, and
- Reports of chemical analyses, chain of custody forms and QA/QC data.

Additional guidance on the closure process may be found in *Closure of Waste-Management Units Subject to TRRP* (RG-366/TRRP-2A) and *TRRP Compatibility with RCRA* (RG-366/TRRP-3). These guidance documents may be obtained from the TCEQ's TRRP Guidance and Forms page at <http://www.tceq.texas.gov/remediation/trrp/guidance.html>.

When responding by mail, please submit one paper copy and one electronic copy (on USB or disc) of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted in electronic format to the local TCEQ Region Office. The information in the reference block should be included in all submittals. Note that the electronic and hard copies should be identical, complete copies. A Correspondence ID Form (TCEQ Form 20428) must accompany each document submitted to the Remediation Division and should be affixed to the front of your submittal. The Correspondence ID Form helps ensure that your documents are identified correctly and are routed to the applicable program for a timely response.