

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 7

## RESPONSE TO COMMENTS DRAFT RCRA PART II PERMIT

INTERNATIONAL PAPER COMPANY  
JOPLIN, MISSOURI  
RCRA ID# MOD007129935

The United States Environmental Protection Agency (hereafter referred to as “EPA”) prepared a draft RCRA Part II Permit (“draft Part II Permit”) and proposed reissuance of a hazardous waste management permit issued to International Paper Company (IPCO) pursuant to regulations promulgated under the Resource Conservation and Recovery Act (RCRA). IPCO’s facility is located at 2609 South Rangeline Road, Joplin, Missouri, 64804, North Latitude 37° 03’42”, West Longitude 94° 28’32”.

Public Participation activities conducted for the draft Part II Permit were in accordance with 40 CFR Part 124. The Administrative Record for the EPA’s draft Part II Permit was available throughout the comment period at the Joplin Public Library, Joplin, Missouri, the Missouri Department of Natural Resources (MDNR) office in Jefferson City, Missouri, and at the EPA Region 7 Records Center in Lenexa, Kansas.

The 45-day public comment period ended September 16, 2013. Notice of the public comment period was provided to the public that included the following:

- Notification Letter, Fact Sheet and Legal Notice mailed to the IPCO hazardous waste permit mailing list (08-02-2013)
- Legal Notice published in the Joplin Globe (08-03-2013)
- Radio announcement broadcast on KQYX/AM and KBTN/FM radio stations

### **RESPONSE TO COMMENTS**

EPA received comments from one person during the comment period. The full text of the comments received is included in the administrative record and the attached letter from International Paper titled *Draft U.S. EPA Hazardous Waste Management Facility Part II Permit* dated September 13, 2013. Below is the EPA’s response.

1. **The year of the Permit effective date has been changed to 2013.**
2. **The document title has been changed from *Cleanup Action Workplan dated October 17, 2011* to *Cleanup Action Workplan-Revision 1.0 dated August 20, 2012*.**
3. ***Region VII* has been changed to *Region 7*.**

4. **The owner and operator addresses have been updated.**
5. **The word *approximately* has been added to the description regarding site acreage.**
6. **The regulation of 40 CFR §270.30(l)(5) explicitly states *14 days*. The Part II Permit has not been revised.**
7. **Both the Part I and Part II Permits apply to the entire facility. 40 CFR §270.2 definition of a Hazardous Waste Management facility; “*means all contiguous land, and structures, other appurtenances, and improvements on the land...*” The Part II Permit has not been revised.**
8. **The first paragraph has been revised to state:**

*The state of Missouri is not authorized for EPA Hazardous Waste Code F032 because the State has not adopted the pertinent Federal Registers. Waste associated with operation of the Drip Pad and the Main Treatment Area is classified as F032 in accordance with 40 CFR Part 261.31. Therefore, this Part II Permit contains regulatory requirements for the Drip Pad and the Main Treatment Area.*

9. **The document title has been changed from *Cleanup Action Workplan dated October 17, 2011* to *Cleanup Action Workplan-Revision 1.0 dated August 20, 2012*. The statement; *Therefore, the Framing Building Area is regulated under Part I of the Permit only* was not added. Both the Part I and Part II Permits apply to the entire facility; see Response to Comment 7.**
10. **The origin of the F032 waste code has been removed from Condition VIII.A.**
11. **40 CFR §264.144(b) explicitly states *30 days*. The Part II Permit has not been revised. The Part II Permit has been revised to read *Implicit Price Deflator for Gross Domestic Product* instead of *Implicit Price Deflator for Gross National Product*.**
12. **Table 2, Page 52 has not been revised. See the Response to Comment 11.**

Done at Lenexa, Kansas, this 30th day of September, 2013.

[Original signed by John Smith for]

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Becky Weber  
Director  
Air and Waste Management Division

Attachment

**Brian E. Jones, P.E.**  
Program Manager  
Environment, Health, Safety & Sustainability

**INTERNATIONAL  PAPER**

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September 13, 2013

Mr. Mike Dandurand, P.E.  
U.S. EPA Region 7  
Waste Remediation and Permitting Branch  
11201 Renner Boulevard  
Lenexa, Kansas 66219

**Re: Draft U.S. EPA Hazardous Waste Management Facility Part II Permit**  
International Paper Former Treated Wood Products Facility  
2609 South Rangeline Road, Joplin, MO  
MOD007129935

Dear Mr. Dandurand:

On August 6, 2013, International Paper Company (IPCO) received the draft (i.e., unsigned) U.S. Environmental Protection Agency (EPA) Hazardous Waste Management Facility Part II Permit (No. MOD007129935) for the IPCO former Treated Wood Products Facility in Joplin, Missouri. A review of the draft permit along with the facility's current permit was conducted. Recommendations and comments based on our review are provided herein. In addition, revisions to the draft permit are included as Attachment 1.

**1. Draft Permit, Page 2, third paragraph. "...Permit shall become effective at 12:01 a.m. on \_\_\_\_\_, 2012, and..."**

IPCO Comment: The date should be 2013. Page 2 of the draft permit has been revised accordingly.

**2. Draft Permit, Page 6. Definition of "Permit Application"**

IPCO Comment: IPCO recommends that the Cleanup Action Work Plan dated October 17, 2011 be replaced with the Cleanup Action Work Plan – Revision 1.0 dated August 20, 2012. Page 6 of the draft permit has been revised accordingly.

**3. Draft Permit, Page 7. Definition of "Regional Administrator"**

IPCO Comment: IPCO recommends that the term "Region VII" be revised to "Region 7" to be consistent with other references within the draft permit. Page 7 of the draft permit has been revised accordingly.

**4. Draft Permit, Page 8. Address for Facility owner and operator.**

IPCO Comment: The address for the owner and operator has been updated as shown on the attached revised page 8.

**5. Draft Permit, Page 8, II.A.4. Description**

IPCO Comment: IPCO recommends that the word "approximately" be added in the description regarding the site acreage. Page 8 of the draft permit has been revised accordingly.

**6. Draft Permit, Page 19, II.E.13. Reports of Compliance Schedules**

IPCO Comment: IPCO requests that Reports of compliance or noncompliance with, or any, progress reports on, interim and final requirements contained in any compliance schedule of the Part II Permit be submitted no later than thirty (30) days following each scheduled completion date rather than 14 days. Page 19 of the draft permit has been revised accordingly.

**7. Draft Permit, Page 19. Condition II.E.14. Transfer of Permits**

IPCO Comment: Because Part I of the draft permit addresses all areas of the Joplin site except the Drip Pad and Main Treatment Area, IPCO recommends Condition II.E.14. be revised to state that, "As set forth at 40 CFR §264.12(c), before transferring ownership or operation of that portion of the Facility containing the Drip Pad or Main Treatment Area, the Permittee shall notify the new owner or operator in writing..."

Should IPCO sell a portion of the property other than the Drip Pad and Main Treatment areas, it would not be necessary that the new owner or operator read the Part II Permit, understand its requirements or comply with the terms and conditions of the Part II Permit because that portion of the property is regulated under Part I of the Permit. Condition II.E.14. has been revised accordingly.

**8. Draft Permit, Page 29, Condition VII. Compliance with the Consent Agreement/Final Order**

IPCO Comment: The first paragraph of Condition VII. has been revised to state that waste associated with operation of the Framing Building Area and the Drip Pad is classified as F032 because the waste originated from operations in the Main Treatment Area. Condition VII. was also revised to state that the Part II Permit contains regulatory requirements for the Framing Building Area, Drip Pad and the Main Treatment Area.

**9. Draft Permit, Pages 29 and 30, Condition VII.A. Cleanup Action Workplan for the Framing Building**

IPCO Comment: IPCO recommends that the Cleanup Action Work Plan dated October 17, 2011 be replaced with the Cleanup Action Work Plan – Revision 1.0 dated August

September 13, 2013

20, 2012. Page 29 of the draft permit has been revised accordingly.

Condition VII.A. implies that the Framing Building Area has been removed from the Part II Permit as the CAFO conditions for this area have been met. For clarity the following sentence has been added to Condition VII.A.: "Therefore, the Framing Building area is regulated under Part I of the Permit only."

**10. Draft Permit, Page 30, Condition VIII.A. General Conditions and Unit Identification**

IPCO Comment: Condition VIII.A. has been revised to remove the origin of F032 (See Comment No. 8).

**11. Draft Permit, Page 35, Condition VIII.E.3.**

IPCO Comment: IPCO requests that the post-closure cost estimate be updated for inflation within ninety (90) days after the close of the firm's fiscal year rather than thirty (30) days.

In addition, to be consistent with Part I of the Permit and previous submittals, IPCO recommends using the inflation factor derived from the most recent Implicit Price Deflator for the Gross Domestic Product rather than the Gross National Product. Page 35, Condition VIII.E.3. has been revised accordingly.

**12. Draft Permit, Page 52, Table 2. Adjustment of the estimated cost of the work for inflation and post closure care.**

IPCO Comment: The Condition cited for the cost adjustment should be VIII.E.3. In addition, as discussed in comment No. 11, IPCO requests that the post-closure cost estimate be updated for inflation within ninety (90) days after the close of the firm's fiscal year. Table 2 has been revised accordingly.

IPCO appreciates your consideration with regard to the above comments. If you have any questions you may call Sherri Harvey with EarthCon Consultants, Inc. at (770) 973-2100 ext. 2868 or me at (901) 419-4355.

Sincerely,



Brian E. Jones

Attachments:

cc: Sherri Harvey, EarthCon  
Nathan Kraus, MDNR

**ATTACHMENT 1**

This Part II Permit is based on the assumption that the information submitted in the Permit Application is accurate and that the facility will be operated as specified in the Permit Application. Any inaccuracies found in the submitted information may be grounds for the termination, revocation and reissuance, or modification of this Part II Permit in accordance with 40 CFR §§ 270.41, 270.42, and 270.43, and for enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the Permit Application which would affect the Permittee's ability to comply with the applicable regulations or Part II Permit conditions.

The Regional Administrator of EPA, Region 7 has delegated authority to perform all actions necessary to issue, deny, modify, or revoke and reissue Permits for owners and operators of hazardous waste treatment, storage, and disposal facilities pursuant to Section 3005 of RCRA to the Director of Region 7 Air and Waste Management Division (hereafter referred to as Director) or the Director's designated representative, by delegation No. R7-8-6; January 1, 1995 and revised on September 16, 2007.

This Part II Permit is issued as of the date below. Pursuant to 40 CFR §124.15, this Part II Permit shall become effective at 12:01 a.m. on \_\_\_\_\_, 2013, and shall remain in effect for ten (10) years from the date of its issuance unless revoked and reissued under 40 CFR §270.41, terminated under 40 CFR §270.43, or continued in accordance with 40 CFR §270.51(a) or (d). This Part II Permit shall remain in effect even if the Missouri Hazardous Waste Management Permit (Part I) is terminated or expired.

Done Lenexa, Kansas, \_\_\_\_\_ this day of \_\_\_\_\_ 2013.

DRAFT

\_\_\_\_\_  
Becky Weber  
Director  
Air and Waste Management Division

"Day" or "Days" means calendar days unless otherwise specified.

"Director" means the Division Director of AWMD, his or her designee, or an authorized representative.

"Engineering Controls" means any mechanism used to contain or stabilize contamination that ensures the effectiveness of a remedial action and acts as a physical barrier between the contamination and contact with humans or the environment.

"EPA" means the United States Environmental Protection Agency.

"Facility" means International Paper Company facility located at 2609 South Rangeline Road, Joplin, Missouri 64801, T27N, R32W, Jasper County and all contiguous property at this location under the control of the Permittee.

"Hazardous Constituent" means any constituent identified in Appendix VIII of 40 CFR Part 261 or any constituent identified in Appendix IX to 40 CFR Part 264.

"Hazardous Waste" means any solid waste as defined at 42 U.S.C. §6903 (27) and 40 CFR §261.2 which also meets any of the criteria of a hazardous waste as listed in 42 U.S.C. §6903 (5) and 40 CFR §261.3.

"Inspection Schedule" shall mean any EPA approved Inspection Schedule and subsequent approved revision or modification to the Inspection Schedule.

"Institutional Controls" means administrative and/or legal mechanisms that help limit exposure to humans from contamination and/or protect the integrity of the remedy.

"Interim Measure" means those actions taken to immediately control or abate threats or potential threats to human health or the environment from releases or potential releases of hazardous waste or hazardous constituents, which can be initiated before implementation of the final corrective measures for a facility,

"Monthly" means twelve (12) times per year (once per calendar month) such that at least fifteen (15) days and no more than forty-five (45) days have elapsed since the last monthly event.

"Part II Permit" means Part II of the RCRA Permit which is issued by EPA.

"Permit Application" means the Permit Application dated March 8, 2004, as modified by Response to Comments Permit Application Amendment dated February 17, 2012; Consent Agreement Final Order dated August 3, 2004; Cleanup Action Workplan-Revision 1.0 dated August 20, 2012/October 17, 2014; Closure Plan for the Drip Pad and Main Treatment Area — Revision 2 dated January 23,

2012; Framing Building Area Cleanup Action Report dated May 15, 2013; and any subsequent revisions or modifications.

"Post-Closure Work" shall mean work required by any EPA approved post-closure plan and any subsequent EPA approved revisions or modifications to the post-closure plan.

"Quality Assurance Project Plan" means a plan of the same name prepared consistent with the EPA's document titled "EPA Requirements for Quality Assurance Project Plans (EPA QA/R-5)" and any subsequent revisions or editions.

"Quarterly" means four times per calendar year such that at least two (2) months and no more than four (4) months have elapsed since the last quarterly event.

"RCRA Corrective Action Plan" means the document of the same name dated May 1994 and given the OSWER Directive Number 9902.3-2A and EPA Document Number 520-R-94-004 and any subsequent revisions or editions.

"RCRA Facility Investigation Guidance" means the document of the same name dated May 1989 and given the OSWER Directive Number 9502.00-6D and the EPA Document Number 530/SW-89-031.

"Regional Administrator"- means the Regional Administrator of EPA, Region 7VI, or his or her designee.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes and/or hazardous constituents.

"Semi-Annually" means two times per calendar year such that at least five (5) months and no more than seven (7) months have elapsed since the last semi-annual event.

"Solid Waste Management Unit" or "SWMU" means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Stabilization" means actions to control or abate threats to human health and/or the environment from releases at RCRA facilities, and/or to prevent or minimize the further spread of contamination while long-term remedies are pursued.

"Standard Operating Procedure" or "SOP" means a document that establishes or prescribes methods to be followed in the operation of hazardous waste storage, treatment and disposal activities. All SOPs must be signed by a responsible corporate officer and include the certification in 40 CFR §270.11(d)(1). The responsible corporate officer shall be as defined in 40 CFR §270.11(a).

"Waste Analysis Plan" shall mean any EPA approved Waste Analysis Plan and subsequent approved revisions or modifications to the Waste Analysis Plan.

"Weekly" means fifty-two (52) times per calendar year such that no fewer than five (5) days and no more than ten (10) days have elapsed since the last weekly event.

## **II. GENERAL CONDITIONS**

### **II.A. FACILITY INFORMATION**

#### **II.A.1. Owner**

The facility owner is International Paper Company, 6400 Poplar Avenue, Tower H 05-132, Memphis, TN 38197, hereinafter referred to as the Permittee.

#### **II.A.2. Operator**

The facility operator is International Paper Company, 6400 Poplar Avenue, Tower H 05-132, Memphis, TN 38197, hereinafter referred to as the Permittee

#### **II.A.3. Location**

The Permittee's facility is located at 2609 South Rangeline Road, Joplin, MO 64804, T27N, R32W, Jasper County. North Latitude 37° 03'42", West Longitude 94° 28'32". A facility location map and figures showing the layout of the facility are provided in Attachment 1.

#### **II.A.4. Description**

The Permittee manages an inactive wood treating facility, approximately 98 acres in total size, located in a moderately industrialized area in the eastern portion of Joplin, Missouri. The facility contained eleven surface impoundments which have been closed under Resource Conservation and Recovery Act (RCRA) closure requirements and

**II.E.12. Monitoring Reports**

As set forth at 40 CFR §270.30(1)(4), if required, monitoring results shall be reported at the intervals specified elsewhere in this Part II Permit.

**II.E.13. Reports of Compliance Schedules**

As set forth at 40 CFR §270.30(1)(5), reports of compliance or noncompliance with, or any, progress reports on, interim and final requirements contained in any compliance schedule of this Part II Permit shall be submitted no later than thirty (~~30~~)~~fourteen~~ (~~14~~) days following each scheduled completion date.

**II.E.14. Transfer of Permits**

- a. As set forth at 40 CFR §264.12(c), before transferring ownership or operation of that portion of the Facility containing the Drip Pad or Main Treatment Area or any part of the Facility, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270 and this Part II Permit. At least ninety (90) calendar days prior to the anticipated date of transfer, the new owner and/or operator shall submit to the EPA a certification, in accordance with Part II Permit Condition II.F, that the new owner or operator has read this Part II Permit, understand its requirements and will comply with the terms and conditions herein. If the property transfer involves subdividing the property to more than one owner or operator, a map and legal description shall be provided to the Director that identifies the properties to be occupied by each new owner.
- b. As noted in the comment to 40 CFR §264.12, an owner or operator's failure to notify the new owner or operator of the requirements of this Part II Permit in no way relieves the new owner or operator of his or her obligation to comply with all applicable requirements.
- c. This Part II Permit is not transferable to any person except after notice to the Director and the Director modifies or revokes and reissues the Part II Permit in accordance with 40 CFR §270.30(1)(3), 40 CFR

within this 20 day period, the matter will be submitted to the Director for resolution. This resolution shall become part of this Part II Permit.

- B. The existence of a dispute as defined herein and EPA's consideration of such matters as placed in dispute shall not excuse, toll or suspend any obligation or deadline required pursuant to this Part II Permit, that is not the subject of dispute, during pendency of the dispute resolution process.

## **VI. FACILITY-SPECIFIC CONDITIONS**

### **LAND DISPOSAL RESTRICTIONS**

The Permittee must comply with all regulations implementing the land disposal restrictions required in 40 CFR Part 268. The Permittee also must comply with regulations implementing the land disposal restrictions that are promulgated after the effective date of this Part II Permit, as these requirements are self-implementing provisions of HSWA.

## **VII. COMPLIANCE WITH THE CONSENT AGREEMENT/FINAL ORDER**

The state of Missouri is, not authorized for EPA Hazardous Waste Code F032 because the State has not adopted the pertinent Federal Registers. Waste associated with operation of the Framing Building Area and the ~~Drip Pad~~ Main Treatment Area is classified as F032 because the waste originated from operations ~~in~~ of the Main Treatment Area ~~at~~ the Drip Pad. Therefore, this Part II Permit contains regulatory requirements for the Framing Building Area, Drip Pad and the Main Treatment Area.

International Paper Company and the U.S. EPA entered into a Consent Agreement/Final Order (CAFO) effective August 3, 2004. The requirements of this CAFO have been satisfied as required, with the exception of the Closure Plan for the Drip Pad and Main Treatment Area, and associated Reports. At the time of issuance of this Part II Permit, the Closure Plan for the Drip Pad and Main Treatment Area has not been approved.

### **VII.A. CLEANUP ACTION WORKPLAN FOR THE FRAMING BUILDING**

In accordance with Section II, Paragraph 22.b. of the August 3, 2004 CAFO; the Permittee has submitted a Cleanup Action Work Plan for the Framing Building Area. The document titled Cleanup Action Work Plan-Revision 1.0, dated ~~August 20, 2012~~ October 17, 2014, was submitted to satisfy the requirements for the Framing Building. This document requested approval to remove contaminated soils in the area of the Framing Building and dispose of the material off site at an approved facility. In

a letter dated June 17, 2013; EPA approved a Framing Building Area Cleanup Action Report dated May 15, 2013 which documented closure of the Framing Building area in accordance with the CAFO. Therefore, the Framing Building area is regulated under Part I of the Permit only.

#### **VII.B. CLEANUP ACTION WORKPLAN FOR THE DRIP PAD AND MAIN TREATMENT AREA**

In accordance with Section II, Paragraph 22.b. of the August 3, 2004 CAFO; the Permittee has submitted a Cleanup Action Work Plan for the Drip Pad and Main Treatment Area. The document titled Closure Plan for the Drip Pad and Main Treatment Area — Revision 2 (Closure Plan), dated January 23, 2012 was submitted to satisfy the requirements for the Drip Pad and Main Treatment Area. This document requested approval to demolish existing structures, replace one monitoring well, and install a protective cap. Upon EPA approval, the Permittee shall implement activities in accordance with the schedule contained in the approved Closure Plan for the Drip Pad and Main Treatment Area — Revision 2 and any subsequent EPA approved addendums or revisions.

#### **VIII. POST-CLOSURE CARE**

##### **VIII.A. GENERAL CONDITIONS AND UNIT IDENTIFICATION**

The State of Missouri is not authorized for EPA Hazardous Waste Code F032 because the State has not adopted 55 Federal Register 50450 (06 December 1990) amended at 56 Federal Register 27332 and 56 Federal Register 30192. Waste associated with operation of the Drip Pad Area and the Main Treatment Area is classified as F032 because the waste originated from operation of a Drip Pad. Therefore, this Part II Permit contains regulatory requirements for the Drip Pad Area and the Main Treatment Area.

In accordance with Section II, Paragraph 22.b. of the August 3, 2004 CAFO; the Permittee has submitted a Closure Plan. After EPA approval of the Closure Plan and acceptance of certification of closure of the Drip Pad Area and Main Treatment Area, the Permittee shall comply with the post-closure conditions as described below.

In the event that the Permittee cannot remove all hazardous constituents from the Drip Pad Area and Main Treatment Area below health based cleanup levels selected by EPA, the Permittee shall provide post-closure care in accordance with an approved Post-Closure Plan, subject to the terms and conditions of Section VIII.A through Section VIII.H, and 40 CFR §264.110. At the time of issuance of this Part II Permit a Post-Closure Plan has not been approved.

## VIII.E. COST ESTIMATE FOR FACILITY POST-CLOSURE

1. The Permittee shall submit a post-closure cost estimate within 30 days after the director approves the Post-Closure Plan required by Part II Permit Condition VIII.B.2.a. The cost estimate shall be in accordance with 40 CFR §264.144 and Part II Permit Conditions VIII.E.2 through VIII.E.7. The post-closure cost estimate is subject to review and approval pursuant to Part II Permit Condition IV.
2. The post-closure cost estimate required by Part II Permit Condition VIII.E.1, and as required by 40 CFR §264.144, must be sufficient to cover the costs, in current dollars, to conduct the post-closure work, outlined in this Part II Permit. The post-closure cost estimate shall include all costs for a rolling 30-year time period associated with all required post-closure work. The post-closure cost estimate shall be based on the costs to the Permittee of hiring a third party to conduct post-closure work at the facility as outlined in this Part II Permit. A third party is a party who is neither a parent nor a subsidiary of the owner or operator.
3. For the duration of the post-closure period, the Permittee shall adjust the EPA-approved post-closure cost estimate for inflation within sixty (60) days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 40 CFR §264.145 and Part II Permit Condition VIII.F. If using the financial test or corporate guarantee, the post-closure cost estimate shall be updated for inflation within ~~thirty (30)~~ ninety (90) days after the close of the firm's fiscal year and before the submission of updated information to the Director as specified in 40 CFR §264.145(f)(5). The annual adjustment may be made by recalculating the post-closure cost estimate in current dollars or in the case where the post-closure work to be performed has not changed by using an inflation factor derived from the most recent Implicit Price Deflator for Gross Domestic ~~National~~ Product published by the U.S. Department of Commerce in its *Survey of Current Business* as specified in 40 CFR §264.145(b)(1) and (2). The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The first adjustment is made by multiplying the EPA-approved post-closure cost estimate by the current inflation factor. Each subsequent year, the previous year's adjusted estimate shall be multiplied by the latest inflation factor.

**Table 2. Summary of possible reporting requirements pursuant to this Part II Permit.**

<b>CONDITIONAL REQUIREMENTS</b>	<b>DUE DATE</b>	<b>PART II PERMIT CONDITION</b>
Permit Appeal	Within thirty (30) days calendar days after a RCRA final Part II Permit decision has been issued	II.C.6
Reporting Planned Changes	thirty (30) calendar days advance notice of any planned alterations or additions	II.E.10
Reporting Anticipated Noncompliance	thirty (30) calendar days advance notice prior to any planned changes	II.E.11
Provisions for Part II Permit Transfer	90 calendar days prior to date of Part II Permit transfer	II.E.14
Written Notice of Noncompliance	Within 5 calendar days of Permittee's awareness of the circumstance	III.E.15.c
Written Report of Other Noncompliance	Report to EPA in writing, all other instances of RCRA noncompliance within thirty (30) days of occurrence	II.E.16
Adjustment of the estimated cost of the work for inflation and post closure care	Annually within ninetythree (9030) days after the close of the firm's fiscal year anniversary date of the Director's initial approval of such estimated cost of the work and post closure care	VIII.E.32