PUBLIC PARTICIPATION SUMMARY

for the August 2013
Energy*Solutions*' Ground Water Quality Discharge Permit
Modification
Tooele County, Utah

Introduction

This document presents public comments received by the Utah Division of Radiation Control (DRC) regarding a modification of the Energy*Solutions*' Ground Water Quality Discharge Permit (Permit), No. UGW450005, for the low-level, 11e.(2), and mixed radioactive waste disposal facility located at Clive, Utah. The recent Permit modification concerned Best Available Technology (BAT) performance standards found in the Permit and its BAT Monitoring and, Contingency Plans (Appendices J and K). The Public Comment Period for this Permit modification took place from August 1, 2013 to September 17, 2013. One set of written comments were received on September 12, 2013 from Energy*Solutions* during the comment period. A public hearing was not requested by any citizen of the state of Utah before August 16, 2013, as stipulated in the Public Notice of the Permit modification; therefore, a public hearing on this Permit modification was not conducted. The September 12, 2013 comments from Energy*Solutions* were considered in revising the requirements of the facility's Ground Water Quality Discharge Permit, and is restated below in italics. The DRC's response to the written comments follows, and is denoted with the words "DRC Response" in bold text. The complete comment document is included as Appendix A. Revisions made to Energy*Solutions*' Ground Water Quality Discharge Permit since it was issued for public comment, are shown in Appendix B.

1. Written comment from EnergySolutions, Vern C. Rogers, Environmental Manager for EnergySolutions (September 12, 2013)

Since the EnergySolutions' requests dated 8 November 2012 and 8 March 2013, EnergySolutions has removed its Railcar Rollover Facility. Except as noted in the comments below, EnergySolutions agrees with the proposed modifications.

PART I. SPECIFIC PERMIT CONDITIONS:

1) Table 5. Railcar Rollover Facility drawing references should be removed.

2) Section E. 10(e). Railcar Rollover Facility should be removed from the list of locations approved for management and storage of Class A waste received in containers.

3) Section E.l0(f). Railcar Rollover Facility should be removed from the list of

locations approved for management and storage of bulk Class A waste.
4) Section E. 17. This section should be reserved.
5) Section F. 19. This section should be reserved.
6) Section H.19. This section should be reserved.

DRC Response: These are substantive comments. The Railcar Rollover facility handled bulk waste that was received by railcar, and was constructed for the Vitro Tailings project in the 1980's, making it one of the oldest facilities at the Clive site. The DRC was aware that Energy*Solutions* intended to demolish the railcar rollover facility in 2013, and was notified in a July 2013 priorities meeting, with Energy*Solutions*, that the removal of the fabric cover at the railcar rollover facility was to begin within the next week. In a July 23, 2013 email, the DRC was informed that the railcar rollover facility was being taken out of service and that demolition activities would occur after the final required inspections. Energy*Solutions* informed the DRC in the September 12, 2013 letter, they had removed the Rail Car Rollover facility. During a September 17, 2013 Storm Water inspection at the Clive site the DRC confirmed that the facility had been removed and all BAT points of compliance were gone. Figure 1 shows the railcar rollover facility demolition site. Energy*Solutions* is required to control and prevent any alteration of the natural groundwater levels at the Clive site and will thus have to contour the site of the former Railcar Rollover facility to meet Permit requirements. Conditions in the Permit, and its Appendices J and K relating to the Railcar Rollover facility involve engineering design, waste and water management, monitoring, and reporting.

Figure 1. Old Rollover Facility Demolition Area

Modifications made to the Permit due to the removal of the Railcar Rollover facility are:

- Condition I.D.12, Table 5 contains the approved engineering design drawing for waste and wastewater related facilities. The Railcar Rollover facility had five drawings in the table describing its design, cover construction, elevations, drainage, and drain line layout. With the removal of the facility, these no longer have a purpose, and the approved engineering design drawings for the Railcar Rollover facility are removed from Table 5.

- Condition I.E.10.e stipulates waste management performance requirements for the storage of containerized waste. With removal of the Railcar Rollover facility, containerized waste can no longer be stored at the facility, so the Railcar Rollover facility is removed from this condition.

- Condition I.E.10.f deals with waste management performance requirements for bulk waste. With the removal of the Railcar Rollover facility, bulk waste can no longer be stored, so the Railcar Rollover facility is removed from this condition.

- Condition I.E.17 deals with BAT and best management practice standards for the Railcar Rollover facility. With the removal of the facility and all BAT compliance points, this condition is no longer necessary.

- Condition I.F.19 provides for BAT monitoring requirements for the Railcar Rollover facility. With the removal of the facility, monitoring is no longer required.

- Condition I.H.19 requires the submittal of BAT inspection results for the Railcar Rollover facility. With the removal of the facility, submittal of inspection results is no longer required.

<u>APPENDIX J. BAT PERFORMANCE MONITORING PLAN</u>:

1) Section 1. The following edits are suggested for the second to last paragraph in order to improve clarity:

> *"The DRC shall be provided at least 48 hours email notification of the intent to take a facility out of service. Upon request, the DRC shall be provided an opportunity to inspect the facility after it has been taken out of service. DRC will be notified by email and regularly scheduled BAT inspections will resume on the day a facility returns to service."*

2) Section 2. Remove reference to the Rail Rollover Facility in the definition of Contact Stormwater.
3) Section 4.5. This section should be deleted in-total, resulting in a need to renumber Sections 4.6 through 4.22.
4) Section 4.8. Remove reference to the Rail Rollover Facility as a wastewater collection source for the IUF Lift Station.
5) Section 4.22. Remove reference to the Rail Rollover Facility in the wastewater removal priority list.
6) Table 1. Remove reference to the Rail Rollover Facility (e.g., Facility, BAT Description, Inspection and Maintenance, Performance Criteria, and Documentation).

DRC Response: This is a substantive comment. To facilitate the lowest level of pollutants achievable at the Clive site, BAT is used in the construction of, and each facility is operated according to best management practices. The BAT Performance Monitoring Plan addresses each facility with their BAT description, and performance criteria to meet BAT and best management practices requirements. Since the Railcar Rollover facility has been dismantled, it is now removed from Appendix J (note the Railcar Rollover facility is referred to as the rail rollover facility in Appendix J). The following changes were made to Appendix J:

- Edits were made to the second to last paragraph of the introduction for clarity.
- Rail Rollover facility was removed from the definition of contact stormwater.
- The Rail Rollover facility description of operational standards is removed from the BAT performance monitoring section.
- Reference to the Rail Rollover facility is removed from the description of the intermodal unloading facility lift station.
- The Rail Rollover facility is removed from the wastewater removal propriety list in Section 4.22, Stormwater Management.
- Reference to the Rail Rollover facility is removed from Table 1.

Appendix J will now be dated September 25, 2013

<u>APPENDIX K. BAT CONTINGENCY PLAN:</u>
1) Section 4.2.1. Remove reference to the Rail Rollover Facility in the list of

facilities to be placed out of service (contained in step 2).
2) Section 4.5. This section should be deleted in-total, resulting in a need to renumber Sections 4.6 through 4.22.
3) Section 4.9.1. Remove reference to the Rail Rollover Facility

DRC Response: This is a substantive comment. The BAT Contingency Plan gives direction to Energy*Solutions* personnel as to contingency action required to maintain or regain compliance with BAT requirements of the Permit. Since the Railcar Rollover facility has been dismantled, it is now removed from Appendix K (note the Railcar Rollover facility is referred to as the rail rollover facility in Appendix K). The following changes were made to Appendix K:

- The Rail Rollover facility was removed from the list of facilities to be placed out of service if the water level is above the lowest level of the inlet pipe at the evaporation pond lift station.
- The Rail Rollover facility, section 4.5, of the contingency plan was removed.
- The Rail Rollover facility was removed from the list of facilities to be placed out of service if the water level is above the lowest level of the inlet pipe at the intermodal unloading facility lift station.

Appendix K will now be dated September 25, 2013.

Other Minor Changes to Permit

Condition I.D.12, Table 5 - In a letter dated July 25, 2013, Energy*Solutions*, requested approval of a minor modification to a Permit Table 5 drawing, titled Class A West Embankment Active Large Component Area (LCA) Plan and Details, drawing number 10014-C06. Table 5 of the Permit is for approved engineering design drawings for waste and wastewater related facilities. During an August 8, 2013 inspection of the LCA, DRC staff requested that the drawing be revised to add a note with additional details of the construction of the splash berm. On August 13, 2013, the DRC received a revised drawing, Revision 3, with the requested note. In a letter dated September 12, 2013, the DRC requested that additional information be provided. A meeting was held September 18, 2013, to discuss the latest request from DRC for additional information. A final drawing, Revision 4, was received by DRC on September 24, 2013. This drawing was approved by the DRC on October 2, 2013, and is now included in Table 5 of the permit. DRC determined that since this area is all within the restricted area, public health and safety is not impacted by this modification to the drawings.

Appendix K, Section 4.10.3,3 - Manager, Waste Disposal Operations was inadvertently left out of the statement, this is corrected now.

Conclusion

The comments discussed in this document led to additional minor modifications of Ground Water Quality Discharge Permit, No. UGW 4500005 and its Appendices J and K, beyond what was issued for public comment. These modifications of the Permit are considered to not reduce the protection of public health or the environment. The modifications are shown in the marked in underlined/strikeout format, included as Appendix B.

Appendix A

Written comment from EnergySolutions, Vern C. Rogers, Environmental Manager (September 12, 2013)

ENERGY*SOLUTIONS* "DRC-2013-003123"

September 12, 2013 CD13-0250

Mr. Rusty Lundberg
Co-Director
Utah Division of Water Quality
P.O. Box 144850
SLC, UT 84114-4850

RECEIVED
SEP 12 2013
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Subject: Comments on Proposed Modifications to Ground Water Quality Discharge Permit No. UGW450005

Dear Mr. Lundberg:

Energy*Solutions* hereby submits comments to the proposed modifications to Ground Water Quality Discharge Permit (GWQDP) No. UGW450005. Energy*Solutions* appreciates the efforts put forth by the Division in making the proposed changes.

The modifications to GWQDP No. UGW450005 have been proposed in response to Energy*Solutions*' requests dated 8 November 2012 and 8 March 2013, including specific revisions to Appendices J and K. Since these requests, Energy*Solutions* has removed its Railcar Rollover Facility. Except as noted in the comments below, Energy*Solutions* agrees with the proposed modifications.

PART I. SPECIFIC PERMIT CONDITIONS:

1) Table 5. Railcar Rollover Facility drawing references should be removed.
2) Section E.10(c). Railcar Rollover Facility should be removed from the list of locations approved for management and storage of Class A waste received in containers.
3) Section E.10(l). Railcar Rollover Facility should be removed from the list of locations approved for management and storage of bulk Class A waste.
4) Section E.17. This section should be reserved.
5) Section F.19. This section should be reserved.
6) Section H.19. This section should be reserved.

APPENDIX J. BAT PERFORMANCE MONITORING PLAN:

1) Section I. The following edits are suggested for the second to last paragraph in order to improve clarity:

"The DRC shall be provided at least 48 hours email notification of the intent to take a facility out of service. Upon request, the DRC shall be provided an opportunity to inspect the facility after it has been taken out of service. DRC will be notified by email and regularly scheduled BAT inspections will resume on the day a facility returns to service."

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www.energysolutions.com

2) Section 2. Remove reference to the Rail Rollover Facility in the definition of **Contact Stormwater.**
3) Section 4.5. This section should be deleted in-total, resulting in a need to renumber Sections 4.6 through 4.22.
4) Section 4.8. Remove reference to the Rail Rollover Facility as a wastewater collection source for the IUF Lift Station.
5) Section 4.22. Remove reference to the Rail Rollover Facility in the wastewater removal priority list.
6) Table 1. Remove reference to the Rail Rollover Facility (e.g., Facility, BAT Description, Inspection and Maintenance, Performance Criteria, and Documentation).

APPENDIX K, BAT CONTINGENCY PLAN:

1) Section 4.2.1. Remove reference to the Rail Rollover Facility in the list of facilities to be placed out of service (contained in step 2).
2) Section 4.5. This section should be deleted in-total, resulting in a need to renumber Sections 4.6 through 4.22.
3) Section 4.9.1. Remove reference to the Rail Rollover Facility in the list of facilities to be placed out of service (contained in step 3).

I appreciate the opportunity to provide comment and look forward to working with the Division in addressing these changes. Please contact me or Sean McCandless at 801-649-2000 if there are any comments or questions.

Sincerely,

Vern C. Rogers

Vern C. Rogers
Environmental Manager

cc: John Hultquist, DRC
Phil Goble, DRC
Charles Bishop, DRC

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Appendix B
Ground Water Quality Discharge Permit, No. UGW 4500005, and its Appendices J and K marked in underlined/strikout format (underlined text is to be added to, and text crossed out is to be removed from the Permit and Appendices J and K)

STATE OF UTAH
DIVISION OF WATER QUALITY
UTAH WATER QUALITY BOARD
P.O. BOX 16690
SALT LAKE CITY, UTAH 84116-0690

Ground Water Quality Discharge Permit

In compliance with the provisions of the
Utah Water Quality Act, Title 19, Chapter 5, Utah Code Annotated 1953, as amended,

EnergySolutions, LLC
423 West 300 South, Suite 200
Salt Lake City, Utah 84101

hereafter referred to as the "Permittee", is granted a Ground Water Quality Discharge Permit for a Low-Level Radioactive Waste and 11e.(2) Waste Disposal Facility in accordance with conditions set forth herein. This facility currently consists of four separate operable units: a Low-Activity Radioactive Waste (LARW) cell, an 11e.(2) cell, a Mixed Waste cell, a and a Class A West cell, which are located at approximately latitude 40^{o} 41' 18" North, longitude 113^{o} 06' 54" West.

This modified Ground Water Quality Discharge Permit amends and supersedes all other Ground Water Discharge permits for this facility issued previously.

This modified permit shall become effective on
This permit and the authorization to operate shall expire at midnight, **June 8, 2013**, the Permit is in Timely Renewal.

_____
Director
Division of Radiation Control

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PART I. SPECIFIC PERMIT CONDITIONS

A. Ground Water Classification

Based on ground water quality data submitted by the permit applicant, ground water in the vicinity of the site is defined as Class IV, saline ground water.

B. Background Ground Water Quality

1. Background Quality from Existing Monitoring Wells

Based on ground water quality samples collected through June 2006, the upper boundary of background ground water quality is defined as the mean concentration plus the second standard deviation for any contaminant in any individual well as determined by the Director.

2. Determination and Revision of Background Ground Water Quality

After submittal of additional ground water quality data, background ground water quality values may be revised by the Director.

C. Ground Water Protection Levels

1. Ground Water Protection Levels, LARW cell, and Class A West cell

Based on the types of wastes to be received for disposal in the low-activity radioactive waste (LARW) facility, which include naturally occurring radioactive materials (NORM) and Class A low-level radioactive waste (LLRW), an evaluation of indicator isotopes and their mobility, and the Ground Water Quality Standards (GWQS); ground water protection levels (GWPL) are defined as either the GWQS or the Background Concentration, whichever is greater, as listed in Tables 1A and 1B of this Permit. In all cases, ground water quality in any compliance monitoring well at the LARW cell, and Class A West cell shall comply with the GWPLs found in Table 1A, unless other GWPLs have been cited on a well and contaminant-specific basis in Table 1B, below.

2 Ground Water Protection Levels, 11e.(2) cell

Based on the types of waste to be disposed of in the 11e.(2) cell, an evaluation of the Ground Water Quality Standards; GWPLs for inorganic, dissolved metals, and organic parameters are defined as either the GWQS or the Background Concentration, whichever is greater, as listed in Tables 1C and 1D of this Permit. In all cases, ground water quality in any compliance monitoring well at the 11e.(2) cell shall comply with the GWPLs found in Table 1C, unless other GWPLs have been cited on a well and contaminant-specific basis in Table 1D, below.

3. Ground Water Protection Levels for Radiologic Parameters, Mixed Waste cell

Based on the type of waste to be disposed of in the Mixed Waste cell, which includes low-level radioactive waste, an evaluation of indicater isotopes, and the Ground Water Quality Standards (GWQS); ground water protection levels (GWPL) defined as either the GWQS or the Background Concentration, whichever is greater as listed in Table 1E and 1F of this Permit. In all cases, ground water quality in any compliance monitoring well at the Mixed Waste cell shall comply with the GWPLs found in Table 1E, unless other GWPLs have been cited on a well and radiologic parameter-specific basis in Table 1F, below.

4 Revision of Ground Water Protection Levels

After submittal of additional ground water quality data, the ground water protection levels may be revised by the Director.

Table 1A: Ground Water Protection Levels (GWPL) – Universal to All LARW, Class A West, and Evaporation Pond Wells

Parameter	GWPL [1]	Parameter	GWPL [1]
Field and Inorganic Parameters (mg/l)		*Radiologic Parameters – Alpha Emitters [9] (pCi/l)*	
Cyanide	0.2		
Fluoride	4.0	Neptunium-237 [10]	7
Total Nitrate/Nitrite (as N)	10.0	Strontium-90	42
pH (units)	6.5 – 8.5	Thorium-230	83
Dissolved Metals (mg/l)		Thorium-232	92
Antimony	0.006	Uranium-233	26
Arsenic	NA [2]	Uranium-234	26
Barium	2.0	Uranium-235	27
Beryllium [3]	0.004	Uranium-236	27
Cadmium	0.005	Uranium-238	26
Chromium	0.1		
Copper	1.3	*Radiologic Parameters – Beta/Gamma Emitters [12] (pCi/l)*	
Lead	0.015	Carbon-14	3,200
Mercury	0.002	Iodine-129 [12]	21
Molybdenum	NA [2]	Technetium-99	3,790
Nickel [3]	0.10	Tritium	60,900
Selenium	0.05		
Silver	0.1	*Combined Radiologic Parameters (pCi/l)*	
Thallium	0.002		
Uranium – total [4]	0.03	Radium-226 + Radium-228 [13]	5
Zinc	5.0		
Organic Parameters (mg/l)			
Acetone [5]	0.7	1,2-Dichloroethane	0.005

Parameter	GWPL [1]	Parameter	GWPL [1]
2-Butanone [14]	4.0	Methylene Chloride [7]	0.005
Carbon Disulfide [5]	0.7	1,1,2-Trichloroethane [8]	0.005
Chloroform [6]	0.08	Vinyl Chloride	0.002

1. All ground water protection levels (GWPLs) derived from Ground Water Quality Standards (GWQS, see UAC R317-6-2), except as noted.
2. Due to naturally elevated concentrations of arsenic and molybdenum in the Class IV saline aquifer at Clive, Utah, these constituents are poor indicators of cell leakage and therefore will not be used as compliance parameters with ground water protection levels. However, the Permittee will continue to sample, analyze, and report arsenic and molybdenum data in all compliance monitoring wells at Permit and License renewal as a best management practice.
3. Beryllium and Nickel GWQS derived from EPA drinking water Maximum Contaminant Levels (MCL), as published in the July 17, 1992 Federal Register, Vol. 57, No. 138, pp. 31776 – 31849, Table 1.
4. Total uranium GWQS of 0.03 mg/l from EPA final MCL in National Primary Drinking Water Regulations Final Rule for Radionuclides (December 7, 2000 Federal Register, Vol. 65, No. 236, p. 76708).
5. GWQS for acetone and carbon disulfide determined by DWQ staff from reference doses available in the technical literature, see August 8, 1994 DWQ Staff Report: Ground Water Quality Conditions and Proposed Revision to Ground Water Protection Levels, Envirocare of Utah Inc., Low-Level Radioactive Waste and 11e.(2) Waste Disposal Facility, near Clive, Tooele County, Utah, p. 3.
6. GWQS for chloroform derived from a 1998 EPA final drinking water MCL for total trihalomethane compounds in "Drinking Water Standards and Health Advisories", EPA 822-B-00-001, Summer 2000.
7. GWQS for methylene chloride derived from EPA drinking water MCL (ibid.).
8. GWQS for 1,1, 2-Trichloroethane from final EPA MCL in "Drinking Water Regulations and Health Advisories", EPA 822-B-96-002, October 1996.
9. All GWPL values for alpha-emitting radionuclides based on 1E-4 lifetime cancer mortality risk concentration levels provided in 1991 EPA draft MCL values for drinking water (July 18, 1991 Federal Register, Vol. 56, No. 138, pp. 33078-9, 33100-3, and Appendix C).
10. Neptunium-237, as determined by Total Radioactive Neptunium, EPA Method 907.0.
11. All GWPL values for beta/gamma emitting radionuclide parameters based on a 4 millirem/year equivalent dosage, as per 1991 EPA draft MCL values for drinking water (July 18, 1991 Federal Register, Vol. 56, No. 138, pp. 33078, 33103, and Appendix B).
12. Iodine-129, as determined by Total Radioactive Iodine, EPA Method 902.0.
13. GWQS of 5 pCi/l for combined radium-226 + radium-228 from final EPA MCL in National Primary Drinking Water Regulations Final Rule for Radionuclides (December 7, 2000 Federal Register, Vol. 65, No. 236, p. 76708).
14. GWQS for 2-Butanone (methyl ethyl ketone) derived from Life-time health advisory value in "2006 Edition of the Drinking Water Standards and Health Advisories", EPA 822-R-06-013, August 2006.

Table 1B: Ground Water Protection Level Exceptions[1] – LARW, Class A West, and Evaporation Pond Wells

Well ID	Parameter	GWPL [2]	Well ID	Parameter	GWPL [2]
Inorganic/Metal Parameters (mg/l)					
GW-94	Uranium – total	0.035	GW-105	Selenium	0.095
GW-95	Uranium – total	0.0320			
GW-100	Uranium – total	0.117	P3-95 SWC	Uranium – total	0.180
GW-24	Selenium	0.058			
Radiologic Parameters (pCi/l)					
GW-20	Ra-226+Ra-228	5.49	GW-100	Uranium-234	68.6
				Uranium-238	43.0
GW-24	Ra-226+Ra-228	5.81			
			GW-105	Ra-226+Ra-228	6.03
GW-29	Ra-226+Ra-228	5.59			
			GW-58	Uranium-234	31.2
GW-56R	Ra-226+Ra-228	5.31			
			GW-36	Uranium-234	36.4
GW-64	Ra-226+Ra-228	5.63			
			GW-112	Ra-226+Ra-228	6.72
GW-77	Ra-226+Ra-228	5.46			
			P3-95 SWC	Uranium-234	48
GW-84	Ra-226+Ra-228	6.01		Uranium-238	79
				Ra-226+Ra-228	7.63
GW-85	Ra-226+Ra-228	7.77			
			GW-66R	Ra-226 + Ra-228	5.47
GW-86	Ra-226+Ra-228	6.19			
GW-88	Ra-226+Ra-228	5.04			
GW-89	Ra-226+Ra-228	5.04			
GW-90	Ra-226+Ra-228	5.85			
GW-91	Ra-226+Ra-228	5.92			
GW-93	Ra-226+Ra-228	5.54			

1. Table 1B exceptions constitute specific wells and parameters determined to have natural background ground water quality concentrations above GWQS, or as otherwise specified below. Background concentration is defined as the mean concentration plus the second standard deviation for any contaminant in any individual well.
2. The number of significant figures used for all GWPLs determined by laboratory results previously reported by the Permittee.

Table 1C: Ground Water Protection Levels – Universal for all 11e.(2) Wells

Parameter	GWPL [1]	Parameter	GWPL [1]
Field and Inorganic Parameters [2] (mg/l)		*Organic Parameters – Specific to 11e.(2) (mg/l)*	
Cyanide	0.2	Acetone [5]	0.7
Fluoride	4.0	2-Butanone [11]	4.0
Total Nitrate/Nitrite (as N)	10.0	Carbon Disulfide [5]	0.7
pH (units)	6.5 – 8.5	Chloroform [6]	0.08
Dissolved Metals [2] (mg/l)		1,2-Dichloroethane	0.005
Antimony	0.006	Methylene Chloride [7]	0.005
Arsenic	NA [3]	Naphthalene [8]	0.02
Barium	2.0	Diethyl Phthalate [9]	5.0
Beryllium [4]	0.004	2-Methylnaphthalene [10]	0.004
Cadmium	0.005	Benzo(a)anthrancene	0.01
Chromium	0.1	Benzo(a)pyrene	0.01
Copper	1.3	Benzo(k)fluoranthene	0.01
Lead	0.015	Chlordane	0.002
Mercury	0.002	Chrysene	0.01
Molybdenum	NA [3]		
Nickel [4]	0.10		
Selenium	0.05		
Silver	0.1		
Thallium	0.002		
Uranium – total	0.03		
Zinc	5.0		
Combined Radiologic Parameters (pC/l)			
Radium-226+radium-228	5		
Radiologic Parameters (pC/l)			
Thorium-230	83		
Thorium-232	92		

1. All field, inorganic, dissolved metals, and organic indicator organic parameters and corresponding GWPLs for the 11e.(2) wells are equivalent to those for the LARW wells in Table 1A, above.
2. All ground water protection levels (GWPL) derived from Ground Water Quality Standards (GWQS, see UAC R317-6-2), except as noted.
3. Due to naturally elevated concentrations of arsenic and molybdenum in the Class IV saline aquifer at Clive, Utah, these constituents are poor indicators of cell leakage and therefore will not be used as compliance parameters with ground water protection levels. However, the Permittee will continue to sample, analyze, and report arsenic and molybdenum data in all compliance monitoring wells at Permit and License renewal as a best management practice.
4. Beryllium and Nickel GWQS derived from EPA drinking water Maximum Contaminant Levels (MCL), as published in the July 17, 1992 Federal Register, Vol. 57, No. 138, pp. 31776 – 31849, Table 1.
5. GWQS for acetone and carbon disulfide determined by DWQ staff from reference doses available in the technical literature, see August 8, 1994 DWQ Staff Report: Ground Water Quality Conditions and Proposed Revision to Ground Water Protection Levels, Envirocare of Utah Inc., Low-Level Radioactive Waste and 11e.(2) Waste Disposal Facility, near Clive, Tooele County, Utah, p. 3.
6. GWQS for chloroform derived from a 1998 EPA final drinking water MCL for total trihalomethane compounds in "Drinking Water Standards and Health Advisories", EPA 822-B-00-001, Summer 2000.
7. GWQS for methylene chloride derived from EPA drinking water MCL (ibid.).

8. Naphthalene GWQS derived from final EPA drinking water LHA (ibid.).
9. GWQS for diethyl phthalate based on draft EPA drinking water LHA (ibid.).
10. GWQS for 2-methylnaphthalene could not be located or determined, thanks to a lack of reference dosage information in the technical literature. Consequently, a detection monitoring approach has been taken and the GWPL set equal to the minimum achievable detection limit for the compound as a result of matrix interferences from high TDS content of Clive ground water. As health-based risk or other reference dosage information becomes available, the Director may modify the Permit and set a GWQS for 2-methlynaphthalene.
11. GWQS for 2-Butanone (methyl ethyl ketone) derived from Life-time health advisory value in "2006 Edition of the Drinking Water Standards and Health Advisories", EPA 822-R-06-013, August 2006

Table 1D: Ground Water Protection Level Exceptions [(1)] – 11e.(2) Wells

Well ID	Parameter	GWPL [(2)]	Well ID	Parameter	GWPL [(2)]
Inorganic/Metal Parameters (mg/l)					
GW-19A	Cadmium	0.0074	GW-27	Uranium – total	0.039
	Selenium	0.077	GW-36	Uranium – total	0.058
GW-25	Uranium – total	0.146	GW-58	Uranium – total	0.046
GW-26	Uranium – total	0.037			

1. Table 1D exceptions constitute specific wells and parameters determined to have natural background ground water quality concentrations above GWQS, or as otherwise specified below. Background concentration is defined as the mean concentration plus the second standard deviation for any contaminant in any individual well.
2. The number of significant figures used for all GWPLs determined by data evaluation and review of analytical method sensitivity.

Table 1E: Ground Water Protection Levels Universal to All Mixed Waste Wells

Parameter	GWPL	Parameter	GWPL
Dissolved Metals (mg/l)			
Uranium – total [(1)]	0.03		
Radiologic Parameters (pCi/l)			
Alpha Emitters [(2)]		*Beta/Gamma Emitters* [(4)]	
		Carbon-14	3,200
Neptunium-237 [(3)]	7	Iodine-129 [(5)]	21
Strontium-90	42	Technetium-99	3,790
Thorium-230	83	Tritium	60,900
Thorium-232	92		
Uranium-233	26		
Uranium-234	26	*Combined Radiologic Parameters (pCi/l)*	
Uranium-235	27	Radium-226 + Radium-228 [(6)]	5
Uranium-236	27		
Uranium-238	26		

1. Total uranium GWQS of 0.03 mg/l from EPA final MCL in National Primary Drinking Water Regulations Final Rule for Radionuclides (December 7, 2000 Federal Register, Vol. 65, No. 236, p. 76708).
2. All GWPL values for alpha-emitting radionuclides based on 1E-4 lifetime cancer mortality risk concentration levels provided in 1991 EPA draft MCL values for drinking water (July 18, 1991 Federal Register, Vol. 56, No. 138, pp. 33078-9, 33100-3, and Appendix C).
3. Neptunium-237, as determined by Total Radioactive Neptunium, EPA Method 907.0.
4. All GWPL values for beta/gamma emitting radionuclide parameters based on a 4 millirem/year equivalent dosage, as per 1991 EPA draft MCL values for drinking water (July 18, 1991 Federal Register, Vol. 56, No. 138, pp. 33078, 33103, and Appendix B).
5. Iodine-129, as determined by Total Radioactive Iodine, EPA Method 902.0.
6. GWQS of 5 pCi/l for combined radium-226 + radium-228 from final EPA MCL in National Primary Drinking Water Regulations Final Rule for Radionuclides (December 7, 2000 Federal Register, Vol. 65, No.236,p.76708).

Table 1F: Ground Water Protection Level Exceptions [(1)] – Mixed Waste Wells

Well ID	Parameter	GWPL [(2)]	Well ID	Parameter	GWPL [(2)]

1. Table 1F exceptions constitute specific wells and parameters determined to have natural background ground water quality concentrations above GWQS, or as otherwise specified below. Background concentration is defined as the mean concentration plus the second standard deviation for any contaminant in any individual well.
2. The number of significant figures used for all GWPLs determined by laboratory results previously reported by the Permittee.

D. Best Available Technology (BAT) Design Standard

1. Discharge Technology Performance Criteria

Best available technology for the facility will incorporate discharge technology based on the use of earthen materials in both the bottom liner and final cover. However, under no circumstances shall the facility cause ground water at the compliance monitoring wells (Part I.F.1) to exceed the ground water protection levels in Part I.C for the following minimum periods of time:

Disposal Cell	Contaminant Group	Performance Standard*
LARW, and Class A West	Heavy metals Inorganics Organics Mobile and non-mobile Radionuclides	200 years 200 years 200 years 500 years
11e.(2)	Heavy metals Inorganics Organics	200 years 200 years 200 years
Mixed Waste	Mobile and non-mobile	500 years

* Said performance standards shall be measured from the following initial startup dates: 1988 [LARW Cell], 1992 [Mixed Waste Cell], 1994 [11e.(2) Cells], and 2000 [Class A West Cell]

If after review of any environmental monitoring data collected at the facility, the Director determines that the ground water protection levels in Part I.C of the Permit may be exceeded at the compliance monitoring wells before completion of the above-minimum time periods, said potential shall constitute a violation of the Best Available Technology requirements of this Permit.

2. Authorized LARW Cell Engineering Design and Specifications

The best available technology design standard shall be defined by, and construction of the LARW facilities shall conform to the engineering plans summarized in Table 2A, below, and the specifications listed in the approved LLRW and 11e.(2) Construction Quality Assurance/Quality Control (CQA/QC) Manual (Radioactive Materials License No. 2300249 (the License), Condition 44):

For the LARW cell, this engineering design includes, but is not limited to, the following elements:

a) Cover System – shall include the following materials or as specified by the approved LLRW and 11e.(2) CQA/QC Manual (Radioactive Materials License, Condition 44), from the top down:

1) An 18-inch thick erosion barrier consisting of a 1.25-inch, or greater, average diameter rock material over the top-slope area, and a 4.5-inch, or greater average diameter rock material over the side-slope area, as specified on the approved engineering drawing number 9407-4,

2) A 6-inch thick upper filter zone consisting of sandy gravel material,

3) A 12-inch compacted thickness of sacrificial soil with a minimum Residual Moisture Content of 3.5% (by weight). Such Residual Moisture Content shall be the asymptotic value measured by ASTM Methods D-3152 and D-2325 at soil tensions above 15 bars. If the fines content (#200 sieve) of the sacrificial soil is greater than or equal to 15%, residual moisture content testing is not required,

4) A 6-inch lower filter zone consisting of sandy gravel material with a minimum permeability of 3.5 cm/sec,

5) A 2-foot thick clay radon barrier measured perpendicular to the slope. Said radon barrier will be divided into two layers:

   i. An upper layer, 1 foot thick, with a field hydraulic conductivity of 5.0E-8 cm/sec or less, and

   ii. A lower layer, 1 foot thick with a field hydraulic conductivity of 1.0E-6 cm/sec or less.

   Top slope of the embankment shall be between 2% and 4%, as specified on the approved engineering drawings, and side slopes shall be no steeper than approximately 5:1. The outside toe of the clay radon barrier/liner shall extend outward and beyond the outermost edge of the waste layer and shall merge with the bottom clay liner.

b) Waste Layer – the waste layer shall not exceed a final thickness of 43 feet above the top of the bottom clay liner.

c) Clay Bottom Liner – the bottom clay liner shall be constructed below natural grade on slopes no greater than 0.12% north to south and 0.2% east to west. Final grade and elevation for the base of the clay liner will comply with the approved engineering design (Table 2A). This liner will be constructed after excavation of the site to the total design depth, followed by placement of imported clay materials, which meet the approved specifications for material and construction. The new clay liner shall be graded to prevent the accumulation of leachate over the existing 1-foot thick clay liner. The clay liner shall be a minimum of 2 feet thick, measured perpendicular to the slope, constructed in accordance with the approved LLRW and 11e.(2) CQA/QC Plan (Radioactive Materials License, Condition 44), and have a field hydraulic conductivity of 1.0E-6 cm/sec or less.

Table 2A: Approved LARW Cell Engineering Design Drawings

Drawing	Last Revision Date	Subject
9407-2, Rev. E	July 28, 1998	LARW Disposal Cell – Cell Location and Excavation Limits
9407-4, Rev. V	February 1, 2005	LARW Disposal Cell – LARW Cell Closure
9407-4A, Rev. L	May 16, 2003	LARW Disposal Cell – LARW Cell Closure
9407-4B, Rev. J	May 16, 2003	LARW Disposal Cell – LARW Cell Closure
9407-5, Rev. I	February 4, 1999	LARW Disposal Cell – Site Layout
9407-6, Rev. E	July 28, 1998	LARW Disposal Cell – Site Layout
9407-7, Rev. A	June 27, 1994	Drainage Plan – Plan View
9407-7A, Rev. A	June 27, 1994	Drainage Plan – Details
9407-8, Rev. C	October 16, 1998	LARW Disposal Cell Wedge Expansion Cross Section
03046-VO1, Rev. 0	May 16, 2003	LARW Disposal Cell – Radon Barrier Design Sections and Details
03046A-VO1 Rev. -	August 1, 2003	LARW Disposal Cell Closure – Plan and Details
03046A-VO2 Rev. 1	August 1, 2005	LARW Disposal Cell Closure – Sections and Details

Table 2A: Approved LARW Cell Engineering Design Drawings

Drawing	Last Revision Date	Subject
03046A-VO3 Rev. -	August 1, 2003	LARW Disposal Cell – Radon Barrier Redesign Sections and Details
03046A-VO4 Rev. -	August 1, 2003	LARW Disposal Cell – Radon Barrier Redesign Sections and Details
03046A-VO5 Rev. -	August 1, 2003	LARW Disposal Cell – Radon Barrier Redesign Section and Details
L9	July 21, 1993	Fence Details

3. 11e.(2) Disposal Cell Design

The best available technology design standard shall be defined by, and construction of the 11e.(2) cell shall conform to the approved engineering design summarized in Table 2B, below, and the specifications listed in the currently approved LLRW and 11e.(2) CQA/QC Manual

Table 2B: Approved 11e.(2) Cell Engineering Design Drawings

Drawing	Last Revision Date	Subject
9420-4, Rev. F	March 4, 2002	11e.(2) Disposal Cell, Layout
9420-5, Rev. D	February 21, 2002	11e.(2) Disposal Cell, Cross Sections
9420-6, Rev. D	December 21, 2002	11e.(2) Disposal Cell, Ditch Cross Sections

Said 11e.(2) cell engineering design shall include, but is not limited to, the following elements:

a) Cover System – shall include the following materials, as described from the top down:

1) Top-slope Area – the top-slope shall consist of the following materials, from the top down:

i) Riprap Erosion Barrier – a 12-inch thick layer of rock armor material with a particle size ranging from 0.75 to 4.50 inches in diameter with an average diameter between 1.125 and 3.0 inches.

ii) Filter Zone – a single 12-inch thick layer of granular material with a particle size ranging from 0.3125 to 3.0 inches in diameter (coarse sand to fine cobble) and a minimum hydraulic conductivity of 42 cm/sec.

iii) Upper Radon Barrier – a layer of clay material at least 12 inches thick with a field hydraulic conductivity of 5.0E-8 cm/sec or less.

iv) Lower Radon Barrier – a layer of clay material at least 3 feet thick with a field hydraulic conductivity of 1.0E-6 cm/sec or less.

The minimum slope for top-slope areas shall be 2.1%.

2) Side-slope Area – the side-slope area shall consist of the following materials, from the top down:

A. Riprap Erosion Barrier – an 18-inch thick layer of rock armor material with a particle size ranging from 2.0 to 16.0 inches in diameter with an average diameter between 4.5 and 8.0 inches.

B. Filter Zone – a single 12-inch thick layer of granular material with a particle size ranging from 0.3125 to 3.0 inches in diameter (coarse sand to fine cobble) and a minimum hydraulic conductivity of 42 cm/sec.

C. Upper Radon Barrier – a layer of clay material at least 12 inches thick with a field hydraulic conductivity of 5.0E-8 cm/sec or less.

D. Lower Radon Barrier – a layer of clay material at least 2.5 feet thick with a field hydraulic conductivity of 1.0E-6 cm/sec or less.

The slope for side-slope areas shall be approximately 20%.

b) 11e.(2) Waste Layer – the 11e.(2) waste shall not exceed a final thickness of 47 feet above the bottom clay liner.

c) Bottom Clay Liner – the clay liner will be constructed only after excavation of the site to the total design depth, followed by placement of imported clay materials which meet the approved specifications for material and construction. The clay liner shall be a minimum of 2 feet thick, measured perpendicular to the slope, and have a field hydraulic conductivity of 1.0E-6 cm/sec or less.

4. Final Authorized Class A West Cell Engineering Design and Specifications

The best available technology design standard shall be defined by, and construction of the Class A West facility shall conform to the engineering plans summarized in Table 2C, below, and the specifications listed in the approved LLRW and 11e.(2) Construction Quality Assurance/Quality Control (CQA/QC) Manual (Radioactive Materials License, Condition 44):

For the Class A West cells, this engineering design includes, but is not limited to, the following elements:

a) Cover System – top-slope and side-slope areas shall include the following materials or as specified by the approved LLRW and 11e.(2) CQA/QC Manual (Radioactive Materials License, Condition 44), from the top down:

1) An 24-inch thick erosion barrier consisting of a 1.25-inch, or greater, average diameter rock material over the top-slope area, and a 4.5-inch, or greater average diameter rock material over the side-slope area, as specified on the approved engineering drawing number 10017-C04,

2) A 6-inch thick upper (Type A) filter zone consisting of sandy gravel material,

3) A 12-inch compacted thickness of sacrificial soil with a minimum Residual Moisture Content of 3.5 % (by weight). Such Residual

Moisture Content shall be the asymptotic value measured by ASTM Methods D-3152 and D-2325 at soil tensions above 15 bars, If the fines content (#200 sieve) of the sacrificial soil is greater than or equal to 15%, residual moisture content testing is not required,

4) A 6-inch lower (Type B) filter zone on the top slope and 18-inch on the side slope, consisting of sandy gravel material with a minimum permeability of 3.5 cm/sec,

5) A 2-foot thick clay radon barrier measured perpendicular to the slope. Said radon barrier will be divided into two layers:

   i. an upper layer, 1 foot thick, with a field hydraulic conductivity of 5.0E-8 cm/sec or less, and

   ii. a lower layer, 1 foot thick with a field hydraulic conductivity of 1.0E-6 cm/sec or less.

Top slope of the embankment shall be between 2% and 4%, as specified on the approved engineering drawings, and side slopes shall be no steeper than approximately 5:1. The outside toe of the clay radon barrier/liner shall extend outward and beyond the outermost edge of the waste layer and shall merge with the bottom clay liner.

b) Waste Layer – the waste layer shall not exceed a final thickness of 75.3 feet above the top of the bottom clay liner.

c) Clay Bottom Liner – the bottom clay liner shall be constructed below natural grade. Final grade and elevation for the base of the clay liner will comply with the approved engineering design (Table 2C). This liner will be constructed after excavation of the site to the total design depth, followed by placement of imported clay materials, which meet the approved specifications for material and construction. The clay liner shall be a minimum of 2 feet thick, measured perpendicular to the slope, constructed in accordance with the approved LLRW and 11e.(2) CQA/QC Manual (Radioactive Materials License, Condition 44), and have a field hydraulic conductivity of 1.0E-6 cm/sec or less.

Table 2C: Approved Class A West Cell Engineering Design Drawings

Drawing	Last Revision	Subject
Class A West Disposal Embankment		
10014-C01, Rev. 2	1/3/12	Class A West Embankment – Embankment Features and Controls
10014-C02, Rev. 2	1/3/12	Class A West Embankment – Cross Sections
10014-C03, Rev. 3	1/5/12	Class A West Embankment – Sections and Details 1 of 2
10014-C04, Rev.3	11/3/11	Class A West Embankment – Sections and Details 2 of 2
10014-C05, Rev.4	5/2/12	Class A West Embankment – Active CWF and LC Areas
10014-C06, Rev.1	5/2/12	Class A West Embankment Large Component Area Plan & Details
10014-C07, Rev.0	4/28/11	Class A West Embankment – CWF Area Plan & Details

Table 2C: Approved Class A West Cell Engineering Design Drawings

10014-C09, Rev. 1	11/4/11	Class A West Embankment – CWF Cross Sections
10014-U01, Rev.24	1/5/12	Class A West Embankment – Embankment Location Map and Buffer Zone
10014-U02, Rev. 2	1/5/12	Class A West Embankment – Environmental Monitoring

5. Disposal Cell Location Restrictions

The LARW, 11e.(2), and Class A West disposal cells shall be restricted to the following locations in Section 32, Township 1 South, Range 11 West, SLBM, as specified on the currently approved engineering plans, drawings, and the approximate Latitude and Longitude Coordinates provided in Table 3 below:

Table 3: Authorized LARW, 11e.(2), and Class A WestDisposal Cell Locations

Disposal Cell	Edge of Waste Position	Coordinates	
		Latitude	Longitude
LARW	NW Corner	40° 41' 11.382" N	113° 06' 51.318" W
	SW Corner	40° 40' 52. 908" N	113° 06' 51. 203" W
	SE Corner	40° 40' 52. 960" N	113° 06' 36. 734" W
	NE Corner	40° 41' 11.434" N	113° 06' 36. 848" W
11e.(2)	NW Corner	40° 41' 54.846" N	113° 06' 55.564" W
	SW Corner	40° 40' 55. 055" N	113° 07' 24. 761" W
	SE Corner	40° 40' 54. 845" N	113° 06' 55. 564" W
	NE Corner	40° 41'12.380" N	113° 06' 55.346" W
Class A West	NW Corner	40° 41' 39.609" N	113° 07' 24.754
	SW Corner	40° 41' 14. 230" N	113° 07' 24. 702" W
	SE Corner	40° 41' 14.191" N	113° 06' 55.369" W
	NE Corner	40° 41' 39.569" N	113° 06' 55.463" W

This description does not include the Mixed Waste facility, located east of the LARW Cell, which is authorized under a separate State-issued Part B Permit from the Utah Division of Solid and Hazardous Waste.

6. Definition of LARW Waste

For purposes of this Permit, Low-Activity Radioactive Waste (LARW) is defined as radioactive wastes, which meet the definition of Class A Low-Level Radioactive Waste (LLRW) under the Utah Radiation Control Rules, UAC R313-15-1008, or are defined as Naturally Occurring and Accelerator Produced Radioactive Materials under the Utah Radiation Control Rules, UAC R313-12-3.

7. Definition of Mobile Waste

Any waste containing any of the following isotopes shall be considered a mobile waste and subject to special provisions or requirements under this Permit: aluminum-26, berkelium-247, calcium-41, californium-249, californium-250,

carbon-14, chlorine-36, iodine-129, neptunium-237, rhenium-187, sodium-22, technetium-99, terbium-157, terbium-158, or tritium.

8. Definition of PCB/Radioactive Waste

For purposes of this Permit, PCB/Radioactive Waste to be accepted for disposal shall meet the criteria specified in R315-315-7(2)(a) or (3)(b)(i-vi) of the rules designated for disposal in a municipal or non-municipal non-hazardous landfill.

9. Definition of 11e.(2) Waste

For purposes of this Permit, 11e.(2) Waste is defined as "... tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content", as defined in Section 11e.(2) of the U.S. Atomic Energy Act of 1954, as amended.

10. Collection Lysimeters for Future Construction at the Class A West Cell

Future construction of the clay bottom liner of the Class A West Cell shall include the installation of collection lysimeters below the bottom clay liner, in accordance with the CQA Plan for Collection Lysimeter Construction currently approved by the Director and included herein as Appendix C. The Permittee shall also comply with the currently approved Operation, Maintenance and Closure Plan for Collection Lysimeters, also included herein as Appendix C. In addition, the Permittee shall comply with the following requirements:

a) Collection Lysimeter "As-Built" Report – within 30 days of completion of the construction of each lysimeter, the Permittee shall submit an "As-Built" Report for Director approval.

b) Future Collection Lysimeter Construction Notification – the Permittee shall submit a notice of construction of additional lysimeters in the Class AWest Cell. Said notice shall be submitted at least one week prior to construction in order to allow the Director to inspect lysimeter construction.

c) Future Collection Lysimeter Construction – in addition to any design or construction requirements found in the currently approved Appendix C, the Permittee shall construct all future collection lysimeters in a manner that will allow the lysimeter to be operated in compliance with all performance standards mandated by Part I.E.11 or monitoring requirements dictated by Part I.F.6 of this Permit. Any changes to the approved design or construction specifications in Appendix C shall require prior Director approval.

11. Future Modification of Disposal Cell Engineering Design or Specifications

Any change in the approved engineering design or specifications which causes a significant adverse effect to the infiltration performance of a disposal cell shall require prior submittal and Director approval of infiltration and contaminant transport analysis of the proposed change. Said changes must be submitted to the Director as a written request with the revised engineering drawings, specifications, ground water flow and contaminant transport models, or any other

documentation deemed necessary by the Director, at least 180 days prior to the effective date desired by the Permittee.

12. Final Authorized Engineering Design and Specifications for Waste and Wastewater Related Facilities

Best available technology design standards for related facilities at the disposal site shall be defined by, and construction conform to the engineering plans and specifications summarized in Table 5, below:

Table 5: Approved Engineering Design Drawings for Waste/Wastewater Related Facilities

Related Facility	Drawing No.	Last Revision	Subject / Title
Track 4 Railcar Decontamination Pad	T-100, Rev. 3	Aug. 14, 1999	Foundation
	T-101, Rev. 3	Aug. 16, 1999	Foundation Details
	9906-02, Rev. H	Feb 26, 2007	Wash Water System As-Built
	9906-02A, Rev. H	Feb. 26, 2007	Wash Water System As-Built
Class A West Containerized Waste Facility and Large Component Area Evaporation Basin	10014-C05, Rev. 6	May 10, 2013	Class A West Embankment – Active CWF & LC Areas: Area and Haul Road Layout
	10014-C06, Rev. ~~1~~4	May 2, 2012	Class A West Embankment Large Component Area Plan & Details
	10014-C07, Rev. 3	June 3, 2013	Class A West Embankment CWF Area Plan & Details
	10014-C07A, Rev. 1	May 10, 2013	Class A West Embankment Active CWF Area CWF Area Plan & Details
1995 Evaporation Pond	9718-1, Rev. C	March 13, 2007	Facility Layout
	9504-3, Rev. E	Oct. 28, 1999	Storage Pond
	9504-3A, Rev. A	Oct. 28, 1999	Leak Detection System Details, As-Built
	9504-4, Rev. E	Oct. 28, 1999	Facility Details
	9718-4, Rev. A	Aug. 17, 1998	Piping Diagrams and Pump Station
	08007-C01, Rev. 1	June 26, 2008	1995 Evaporation Pond HDPE Repairs, New 60 mil HDPE Liner
1997 Evaporation Pond	9718-1, Rev. C	March 13, 2007	Facility Layout
	9718-2, Rev. D	Feb. 25, 1999	Evaporation and Storage Pond
	9718-2a, Rev. B	Feb. 25, 1999	Leak Detection System Details, As-Built
	9718-3, Rev. -	Sept. 17, 1997	Details
	9718-4, Rev. A	Aug. 17, 1998	Piping Diagrams and Pump Station
2000 Evaporation Pond	0009-00, Rev. A	July 10, 2000	Site Plan and Facility Layout
	0009-01, Rev. E	Feb. 22, 2008	Plan View
	0009-02, Rev. A	Jan. 29, 2001	Cross Sections
	0009-03, Rev. B	Jan. 29, 2001	Details
	0009-04, Rev. A	Jan. 29, 2001	Sump/Side Slope Cross-Section
	0009-05, Rev. A	Jan. 29, 2001	Leak Detection Details
	0009-06, Rev. A	Feb. 22, 2008	Water Transfer Piping Details
Mixed Waste	9802-1, Rev. D	Dec. 22, 1999	Facility Layout

Table 5: Approved Engineering Design Drawings for Waste/Wastewater Related Facilities

Related Facility	Drawing No.	Last Revision	Subject / Title
Evaporation Pond	9802-2, Rev. F	Dec. 22, 1999	Water Storage Facility
	9802-3, Rev. D	Dec. 22, 1999	Facility Details As-Built
	9802-4, Rev. B	Dec. 4, 1998	Water Storage Facility
	9802-5, Rev. A	Dec. 22, 1999	Leak Detection System Details, As-Built
	9803-2, Rev. -	Feb. 11, 1998	Storage Pad Drain Line As-Built
Box Washing Facility	9621-1, Rev. C	July 20, 1998	Site Plan As-Built Drawing
	9621-2, Rev. B	July 20, 1998	Foundation Plan As-Built Drawing
	9621-3, Rev. B	July 20, 1998	Elevation Views As-Built Drawing
	9621-4, Rev. B	July 20, 1998	Elevation Views As-Built Drawing
	9621-5, Rev. B	July 20, 1998	Wall Detail As-Built Drawing
Intermodal Unloading Facility	9705-1, Rev. A	July 31, 1998	Plan View
	9705-2, Rev. A	July 31, 1998	Cross Section Drawings
	9813-01, Rev. B	March 13, 2007	Layout
	9813-02, Rev. A	July 31, 1998	Layout (and Details)
	0701-G03, Rev. 1	June 8, 2007	Site Layout and Facility Legend
~~Railcar Rollover Facility~~	~~0221-01~~	~~March 26, 2002~~	~~Site Layout and Drain Line~~
	~~0221-02~~	~~March 26, 2002~~	~~Fabric Cover Frame Layout~~
	~~0221-03~~	~~March 26, 2002~~	~~Rollover Cover South Elevation~~
	~~0221-04, Rev. A~~	~~April 24, 2002~~	~~Cover Run-off Collection and Drainage~~
	~~07013-C0, Rev 0~~	~~March 31, 2008~~	~~Drainage repair plan~~
Rail Digging Facility	0107-01, Rev. B	April 25, 2002	Site Layout
	0107-02, Rev. B	April 19, 2002	Digging Track Plan
	0107-03, Rev. B	April 12, 2002	Track and Pad Details
	0107-04A, Rev. A	April 25, 2002	Excavator Ramp
Container Storage Pad	9514-1, Rev. C	March 13, 2007	Plan, Sections and Details
East Truck Unloading Facility	05023-C104, Rev. 9	April 26, 2007	New Site Layout
	05023-C301, Rev. 4	Sept. 22, 2005	Cross Sections
	05023-C401, Rev. 5	Dec. 12, 2005	Truck Unloading Area Plan View
	05023-C402, Rev. 5	De. 12, 2005	Truck Unloading Dock Plan View
	05023-C403, Rev. 7	April 26, 2007	Enlarged Dock Plan View
	05023-C501, Rev. 5	Dec. 12, 2005	Truck Unloading Area Details
	05023-C502, Rev. 4	Dec. 12, 2005	Truck Dock Details
	05023-C503, Rev. 4	Dec. 12, 2005	Truck Dock Details
	05023-S1, Rev. 1	Sept. 22, 2005	Concrete Container Holding Pad Safety Protection
Shredder Facility	05056-F13, Rev._	09/30/06	Shredder Facility; Outfeed Pad Plan and Pad Details (As-Constructed)
	05056-F13A, Rev._	09/30/06	Shredder Facility; Shredder Pad Plan (As-Constructed)
	05056-F13B, Rev._	09/30/06	Shredder Facility; Shredder Pad Details (As-Constructed)
	05056-L1, Rev. 6	09/06	Shredder Facility; Site Layout Plan (As-Built)
	05056-L2, Rev. 2	08/06	Shredder Facility; Containment Pad Water Management Layout Plan
	05056-C1, Rev. 10	09/06	Shredding Facility; Operating Pad Layout (As-Built)
	05056-C6, Rev. 4	09/06	Shredding Facility; Operating Pad – Sections and Details (As-Built)
	05056-C7, Rev 7	9/17/07	Shredding Facility; Catch Basin and Manhole

Table 5: Approved Engineering Design Drawings for Waste/Wastewater Related Facilities

Related Facility	Drawing No.	Last Revision	Subject / Title
			Layouts (As-Built)
	05056-C8, Rev. 2	9/17/07	Shredding Facility; Drainage System Details
	05056-F1 thru -F14	Various	Details
Rotary Dump Facility	05006-C1, Rev. 3	Oct 6, 2006	Heater Building; Plan sheet
	05006-C2, Rev. 5	Oct 6, 2006	Rotary Dump Building; Plan Sheet
	05006-C3, Rev. 3	November 10, 2011	Wash Building; Plan Sheet
	05006-C5, Rev. 3	Oct 6, 2006	Rotary Dump Building; Section A-A
	05006-C6, Rev. 2	Oct 6, 2006	Rotary Dump Building; Section B-B
	05006-C12, Rev. 1	Oct 6, 2006	Heater Building; Drainage Details and Sections
	05006-C7, Rev. 1	Oct 6, 2006	Rotary Dump Building; Section C-C
	05006-C8, Rev. 1	Oct 6, 2006	Rail Car Wash Building; Section D-D
	05006-C9, Rev. 1	Oct 6, 2006	Wash Building, Drainage Plan Sheet
	05006-F1, Rev. 2	Oct 6, 2006	Rotary Dump Facility; Heater, Rotary and Wash Buildings foundation Plan and Details
	05006-F2, Rev. 3	Oct 6, 2006	Rotary Dump Facility; Heater Building Foundation Plan and Details
	05006-F10, Rev. 4	Oct 6, 2006	Rotary Dump Facility; Rotary Dumper Building Foundation Plan and Details
	05006-F13, Rev. 1	Oct 6, 2006	Rotary Dump Facility; Rotary Dumper Building Foundation Plan and Details
	05006-F25, Rev. 3	Oct 6, 2006	Rotary Dump Facility; Rotary Dumper Building Foundation Plan and Details
	05006-F26, Rev. 3	Oct 6, 2006	Rotary Dump Facility; Rotary Dumper Building Foundation Plan and Details
	05006-F27, Rev. 3	Oct 6, 2006	Rotary Dump Facility; Rotary Dumper Building Foundation Plan and Details
	05006-P103, Rev. 1	Sept. 20, 2007	Rotary to NW Corner Pond
	05006-V1, Rev. 2	Dec 1, 2006	Rotary Dump Facility; Water Supply and Waste Water Flow Diagram
	05006-SL100. Rev. 6	Oct 6, 2006	Rotary Dump Building; Sediment Basin Liner Plan
	05006-SL101. Rev. 6	Oct 6, 2006	Rotary Dump Building; Sediment Basin Liner Sections
	05006-SL102. Rev. 6	Oct 6, 2006	Rotary Dump Building; Sediment Basin Liner Section
	05006-F5, Rev.	November 10, 2011	Wash Building Foundation Plan and Details
	05006-F9C, Rev. 3	6/11/08	Wash Building Foundation Details
Intermodal Container Wash Building	05008-G1, Rev. 4	May 19, 2006	Intermodal Container Wash Building; Map Layout and Index
	05008-C100, Rev. 2	May 19, 2006	Intermodal Container Wash Building; Facility Location Map
	05008-C101, Rev. 4	September 26, 2006	Intermodal Container Wash Building; Plan Sheet
	05008-C102, Rev. 2	May 19, 2006	Intermodal Container Wash Building; Section A-A
	05008-C103, Rev. 3	May 19, 2006	Intermodal Container Wash Building; Section B-B
	05008-SL100, Rev. 5	August 23, 2006	Intermodal Container Wash Building;

Table 5: Approved Engineering Design Drawings for Waste/Wastewater Related Facilities

Related Facility	Drawing No.	Last Revision	Subject / Title
			Sediment Basin Liner Plan
	05008-SL101, Rev. 5	August 23, 2006	Intermodal Container Wash Building; Sediment Basin Liner Section A-A
	05008-SL102, Rev. 5	August 23, 2006	Intermodal Container Wash Building; Sediment Basin Liner Section B-B
Decontamination Access Control Building	05015-G001, Rev. 1	February 23, 2006	Access Control Building; Map Layout and Index
	05015-C100, Rev. 1	February 23, 2006	Access Control Building; Facilities Location Map
	05015-C101, Rev. 2	February 23, 2006	Access Control Building; Floor Plan
	05015-C102, Rev. 2	February 23, 2006	Access Control Building; Elevations
	05015-C103, Rev. 3	February 23, 2006	Access Control Building, Typical Sections
	05015-C104, Rev. 0	February 23, 2006	Access Control Building, Site Layout and Gray Water Tank and Pipe
	05015-S100, Rev. 2	June 30, 2006	Access Control Building, 1000 Gallon Gray Water Tank
	05015-P100, Rev. 1	February 23, 2006	Access Control Building, Plumbing Plan
	05015-P101, Rev. 1	February 23, 2006	Access Control Building, Plumbing Details
East Side Drainage and Gray Water System Modifications	06007-G1, Rev. 5	2/26/07	East Side Drainage, Map Layout and Index
	06007-G2, Rev. 4	2/26/07	East Side Drainage, Notes and Specifications
	06007-C1, Rev. 5	2/26/07	East Side Drainage, General Site Plan
	06007-C2, Rev. 5	2/26/07	East Side Drainage, Storm Water Drainage Plan
	06007-C3, Rev. 7	2/1/2010	East Side Drainage, Intermodal Container Wash Facility Gray Water System Plan
	06007-C4, Rev. 6	3/12/08	East Side Drainage, Decon Access Control Gray Water System
	06007-D1, Rev. 7	6/10/09	East Side Drainage, Section and Details
	06007-P1, Rev. 4	2/26/07	East Side Drainage, Pipelines #4 and #5 Alignments and Profiles
	06007-SL1, Rev. 3	3/14/07	East Side Drainage, Storm Water Lift Sump Plan
	06007-SL2, Rev. 3	3/14/07	East Side Drainage, Storm Water Lift Sump Section
	06007-SL3, Rev. 3	3/14/07	East Side Drainage, Storm Water Lift Sump Section
	06007-V1, Rev. 3	2/26/07	East Side Drainage, Storm Water and Waste Flow Diagram

Table 5: Approved Engineering Design Drawings for Waste/Wastewater Related Facilities

Related Facility	Drawing No.	Last Revision	Subject / Title
	06007-P2, Rev. 4	2/22/08	Pipeline 4A and 5A Extension into the 1997 Pond
Northwest Corner Evaporation Pond			
	06021-C1, Rev 5	October 19, 2011	Northwest Corner Pond; General Site Plan and Profile
	06021-C2, Rev. 8	October 19, 2011	Northwest Corner Pond; Pond Plan View
	06021-C3, Rev.5	08/29/07	Northwest Corner Pond; Sections and Details
	06021-C4, Rev. 3	08/29/07	Northwest Corner Pond; Sections and Details
	06021-C5, Rev. 3	08/29/07	Northwest Corner Pond; Sump Plan, Sections, and Details
	06021-C6, Rev. 3	08/29/07	Northwest Corner Pond; Leak Detection System Sections and Details
	06021-C7, Rev. 3	09-17-07	Northwest Corner Pond Leak Detection System Sections and Details
	06021-C10, Rev. 2	October 19, 2011	Northwest Corner Pond; Water Transfer Facility; Plan & Details
	06021-C11, Rev. 1	October 19, 2011	Northwest Corner Pond; Water Transfer Facility; Plan & Details
11e.(2) Disposal Cell Temporary Diversion Ditch	9420-7D	10/15/09	Lift Section Details
DU Storage Building	088800, sheet 1of 10	8/19/10	Anchor Bolt Plan & Details
	088800, sheet 2 of 10	8/19/10	Anchor Bolt Reactions
	088800, sheet 3 of 10	8/19/10	Rigid Frame Elevation
	088800, sheet 4 of 10	8/23/10	Roof Framing
	088800, sheet 5 of 10	8/23/10	Sidewall Framing
	088800, sheet 6 of 10	8/23/10	Sidewall Framing
	088800, sheet 7 of 10	8/19/10	Endwall Framing
	088800, sheet 8 of 10	8/19/10	Endwall Framing
	088800, sheet 9 of 10	8/19/10	Detail drawings
	088800, sheet 10 of 10	8/19/10	Detail drawings
	10008 L01	8/12/10	Building Location Map
	10008 L02	8/12/10	Building Plan & Elevations
	J10197 E1	8/24/10	Electrical Plans and Schedules
	J10197 E2	8/24/10	Electrical installation Details, Wiring Diagrams and One-Line
	J10197 E3	8/24/10	Electrical Specifications
	J10197 M1	8/24/10	Mechanical Plans and Schedules
	J10197 M3	8/24/10	Specifications
	10008 C01	9/2/10	Site Ground Plan
	10335 S1	9/2/10	Foundation Plan and Footing Schedule
	10335 S2	9/2/10	Details
	10335 S3	9/2/10	Notes
Mixed Waste Surface Impoundment	Design Drawings are listed in Attachment II-11 of the State-issued Part B Permit		

13. Authorized Mixed Waste Cell Engineering Design and Specifications

The best available technology standards for the Mixed Waste Cell shall be defined by those requirements mandated by the Utah Division of Solid and Hazardous Waste State-issued Part B Permit, issued April 4, 2003 (as amended), hereafter State-issued Part B Permit. All Mixed Waste Cell engineering design and specifications shall comply with State-issued Permit, Module V.

14. DU Storage Building

The best available technology standards for the depleted uranium (DU) Storage Building shall be defined as the complete physical control and containment of DU within the building. For the purposes of this Permit, waste materials stored in the DU Storage Building will be exclusively limited to Savannah River Site DU material (waste stream 9021-33). The DU waste, in the DU Storage Building, is not subject to the 365-day storage requirement applicable to all other containerized waste in Part I.E.10.a.6 of this Permit.

E. BAT Performance and Best Management Practice Standards

1. Waste Restrictions

a) Allowed Class A Low Level Radioactive Waste Volume - The volume of Class A Low-level Radioactive Waste disposed in the Class A West and Mixed Waste embankments as described in drawing 10014 C01, rev 2 for the Class A West embankment, and in drawing 11009 W02, rev 0 for the Mixed Waste embankment shall not exceed a total of 10.08 million cubic yards.

b) 11e.(2) Waste – any change effecting the non-radiologic content of the waste to be disposed of in the 11e.(2) Cell, including additional types or concentrations of non-radiologic contaminants, above and beyond those defined in Table 6 below, shall require prior approval from the Director, after submittal of satisfactory technical justification to demonstrate that the requirements of Part I.D.1 of this Permit will be met.

c) Solid Waste Landfill Equivalency – PCB/Radioactive Waste shall only be disposed of as designated in the State-issued Part B Permit.

d) Mixed Waste, and Class A West Cells – waste to be disposed of in the Mixed Waste, and Class A West Cells shall be limited to wastes which meet the definition of Class A Low-Level Radioactive Waste (LLRW) under the Utah Radiation Control Rules, UAC R313-15-1008, or are defined as Naturally Occurring and Accelerator Produced Radioactive Materials under the Utah Radiation Control Rules, UAC R313-

2. Prohibited Wastes

a) Hazardous Waste – the disposal of hazardous waste as defined by the Utah Hazardous Waste Management Rules (UAC R315-2-3) is prohibited in the Class A West, and 11e.(2) Disposal Cells. LLRW, or 11e.(2) waste that exceeds the regulatory concentration levels of the Toxic Characteristic Leaching Procedure (TCLP) as defined in 40 CFR Part 261 Subpart C, Table 1 is prohibited, unless specifically authorized in Part I.E.5 of this Permit; Table 6, below; or with prior written approval from the Director. Waste samples shall be collected in accordance with the currently approved Waste Characterization Plan (Radioactive Materials License, Condition 58); the Procedure for Certification of 11e.(2) Waste in the currently approved Appendix E of this Permit, and analyzed for those exclusive parameters listed in Table 6, below; or for PCB/Radioactive Waste, the currently approved State-issued Part B Permit.

Table 6: Maximum Allowable Concentrations in 11e.(2) Waste

Parameter	TCLP Leachate Regulatory Limit (mg/l)	Total Waste Concentration (mg/kg)
Volatile Organic Compounds		
Acetone	n/a	10.0
2-Butanone	200.0	10.0
Carbon Disulfide	n/a	10.0
Chloroform	6.0	10.0
1,1-Dichloroethane	0.5	10.0
Diethyl Phthalate	n/a	80.0
Methylene Chloride	n/a	70.0
2-Methylnaphthalene	n/a	80.0
Naphthalene	n/a	80.0
1,1,2-Trichloroethane	n/a	7.27
Vinyl Chloride	0.2	0.66

b) Liquid Waste – acceptance of liquids and liquid content of all wastes shall be in accordance with the Radioactive Materials License.

c) Chelating Agents – the disposal of any waste containing chelating agents shall be limited to the Mixed Waste Cell and is prohibited in the Class A West, and 11e.(2) Disposal Cells. The disposal of any waste in the Mixed Waste Cell containing chelating agents in excess of 22% by weight is prohibited.

3. Failure to Construct as per Approval

Failure to construct any portion of the facility in compliance with the approved engineering design and specifications or in a manner inconsistent with the LLRW and 11e.(2) CQA/QC Plan (Radioactive Materials License UT 2300249, Condition 44) shall be cause for the Director to require excavation of the materials and remedial construction, retrofit of the embankment or any other mitigative action to prevent the release of pollutants to soil or ground water.

4. Unsaturated Soil Moisture Content Monitoring

The Permittee shall conduct soil moisture content monitoring to verify performance of the engineered containment systems for the LARW, and 11e.(2), Disposal Cells in accordance with the requirements of Part 1.H.17 of this Permit and Radioactive Material License Condition 28. This monitoring shall consist of instrumentation, as approved by the Director, installed in the Cover Test Cell.

The Permittee shall maintain and replace all soil moisture instrumentation as directed by the Director.

The Director reserves the right to require similar soil moisture content monitoring in the radon barrier at the 11e.(2) Cell. The Permittee shall install and make operational any soil moisture instrumentation in compliance with the schedule to be determined by the Director.

5. Allowable Heavy Metal Waste Concentration Limits

Waste containing any of the following non-radionuclide metals: Arsenic, Barium, Cadmium, Chromium, Copper, Lead, Mercury, Selenium, Silver, and Zinc can be disposed of in the Class A West, or 11e.(2) Cells at any concentrations.

6. Open Cell Time Limitation

For each open portion of any disposal cell, final cover construction shall be completed in accordance with the approved engineering plans and specifications (Part I.D.2 and 4) and the approved Construction Quality Assurance / Quality Control Manual requirements under the Radioactive Materials License on or before the end of 18 years after the date of initial placement of the first lift of any LLRW waste in that portion of the open cell. Final cover construction shall include but is not limited to completion of the following:

a. Riprap Layer
b. Type A Filter Layer
c. Sacrificial Soil Layer
d. Type B Filter Layer
e. Upper Radon Barrier Layer
f. Lower Radon Barrier Layer
g. Temporary cover layer
h. Settlement stand installation and all monitoring necessary to demonstrate waste platform is stable and ready for final cover construction.

Any modification of this 18 -year limitation shall require submittal of detailed justification including but not limited to ground water flow and contaminant transport modeling of open cell conditions or other technical information as necessary, and prior Director approval. Said modeling report or other studies must be submitted in their entirety to the Director 180 days prior to the expiration date of the respective 18-year open cell time limit. Failure to secure Director approval

prior to expiration of the 18 -year deadline shall not be cause for the Permittee to postpone construction of the cover of any cell in accordance with the currently approved engineering design and specifications in Part I.D.2 or 4 of this Permit.

7. General Stormwater Management Requirements

The Permittee shall contain all stormwater runoff at the Class A West, and 11e.(2) Disposal Cells which has contacted the waste (i.e., contact stormwater). The Permittee shall not begin pumpage or removal of stormwater that falls inside the restricted area that has not contacted the waste (i.e., non-contact stormwater) before beginning removal of contact stormwater. This includes runoff from waste disposed in excavated, below grade areas of the Class A West, and 11e.(2) Disposal Cells, additionally, and:

a) Within 24 hours of discovery of an accumulation of contact stormwater, the Permittee shall immediately begin pumpage and removal of said stormwater in accordance with the stormwater management schedule listed in Appendix J, BAT Performance Monitoring Plan.

b) The Permittee shall pump and remove contact stormwater in an uninterrupted manner until it is completely removed from said location. The Permittee may utilize equipment, which cannot be used at higher priority locations, at lower priority locations in accordance with stormwater management in Appendix J, BAT Performance Monitoring Plan. All contact stormwater accumulated and pumped shall be disposed of in the evaporation ponds only as explicitly approved by the Director. However, contact stormwater from the Class A West, and 11e.(2) disposal cells may be used for minimal engineering and dust control purposes on the waste in the Class A West disposal celland for dust suppression activities at the Shredder Facility.

c) Class A West Containerized Waste Facility and Large Component Evaporation Basin – precipitation that falls on the Class A West Containerized Waste Facility and Large Component Area shall be allowed to accumulate in an engineered evaporation basin constructed in accordance with the following conditions:

1) The evaporation basin shall be constructed in accordance with the design specifications in engineering drawings listed in Table 5 for the Class A West Embankment and the requirements of the currently approved LLRW and 11e.(2) CQA/QC Manual (Work Element – General Requirements, specification "Runoff Control During Project" and Work Element – "Clay Liner Placement").

2) Fluid head in the evaporation basin shall not exceed a 1-foot level above the lowest point of the evaporation basin protective cover. The occurrence of fluid levels above this 1-foot maximum allowable head limit shall constitute a violation of this Permit.

3) The Permittee shall ensure that the physical integrity of the clay liner is not compromised by desiccation or freeze/thaw cycles by implementing

quality assurance/quality control requirements in the currently approved LLRW and 11e.(2) CQA/QC Manual (Work Element - Clay Liner Placement, specification "Liner Drying Prevention"). This requirement is met by completing an annual survey of the evaporation basin's surface to ensure that at least six inches of compacted clay is present above the top of the clay liner. This survey is to be completed no later than May 1 of each year.

8. 11e.(2) Waste Management Requirements

The Permittee shall manage the 11e.(2) Waste and related activities at the facility in accordance with all applicable requirements of the currently approved Radioactive Materials License, No. UT2300478, for the following activities and procedures:

a) Spill response and prevention

b) Runon and runoff containment

c) Decontamination of vehicles, equipment, and containers

d) Unloading procedures

e) Waste storage time limits

f) Stormwater/wastewater collection and disposal

g) Leaking waste shipments

In addition, the Permittee shall manage 11e.(2) waste storage and handling in compliance with the containment and spill prevention requirements of Part I.E.10.a of this Permit.

9. 11e.(2) Waste Storage

Storage of 11e.(2) waste at the facility shall be explicitly limited to areas within the confines of the 11e.(2) Disposal Cell having completed and approved clay liner.

10. LLRW Waste Management Performance Requirements

The Permittee shall operate and maintain all facilities in compliance with the following performance requirements:

a) Contaminant Containment and Spill Prevention – the Permittee shall manage all site operations to:

1) Prevent contact of wastes with the ground surface.

2) Prevent spills of wastes or liquids contained therein from any contact with the ground surface or ground water.

3) Prevent contact of surface water or stormwater run-on with the waste.

4) Control any runoff, which may have contacted the waste from subsequent contact with the ground surface or ground water by means

of approved engineering containment. Any accumulations of such contact runoff or leachates shall be removed and managed in accordance with Part I.E.7 of this Permit.

5) Prevent wind dispersal of wastes.

6) Minimize the time any waste is held in temporary storage without disposal in a disposal cell or embankment. In no case shall any waste be in temporary storage beyond 365 days after the date of waste entry into the controlled area. Once the waste is removed from temporary storage and is in a disposal cell, the 365 day restriction is no longer relevant.

7) Identify all wastes held in storage by use of clear and legible placards, signs, or labels which identify the generator, waste stream number and dates that said waste or waste container both entered the controlled area and was placed into temporary storage.

8) Maintain all waste containers in a closed, strong tight and watertight condition.

9) All containers in storage shall be inspected as required in the currently approved Appendix J of this Permit.

10) Waste in bags shall be managed as bulk waste.

b) Containerized Waste Storage Pad and Other Waste Storage Areas – the Permittee shall operate and maintain waste containers, the asphalt surface of the Containerized Waste Storage Pad, and other storage surfaces used as a waste storage area, so as to prevent the discharge of stormwater or leachate to subsurface soils or ground water, by completing the following actions, as applicable:

1) Repair or otherwise seal and render impermeable any and all cracks, ruptures, damage, or porous areas found in the asphalt surface or other storage surfaces as soon as possible after discovery, in accordance with the currently approved Appendix K of this Permit.

2) Fill any areas of subsidence and return the asphalt surface or other storage surfaces to its original design grade, permeability, and appearance, in order to prevent the impoundment of any storm water or leachate on the pad as soon as possible after discovery, in accordance with the currently approved Appendix K of this Permit.

3) Prevent contact of waste with precipitation or stormwater by maintaining all containers in a closed and watertight condition.

4) Manage leaking containers in accordance with the Waste Characterization Plan and Radioactive Materials License.

5) Adequately operate and maintain any stormwater collection sump, pump, and pipeage to ensure containment and conveyance of stormwaters to the approved evaporation ponds.

c) Prohibition and Restrictions for Dry Active Waste (DAW) Storage – DAW is defined as contaminated materials without soil-like texture or characteristics that has a dry weight density of 70 pounds per cubic foot or less (e.g., contaminated paper, plastic, personal protective equipment, cloth, or other similar soft-type debris). Open-air storage of DAW is prohibited at the facility. All temporary storage of DWA shall be conducted either inside buildings or in watertight containers at the Containerized Waste Storage Pad or other approved storage areas. DAW located within a disposal cell must be covered at the end of the working day with soil or soil-like waste material to prevent wind dispersal.

d) Intermodal Unloading Facility – the Permittee shall operate and maintain the LLRW Intermodal Unloading Facility to provide free draining conditions on both the unloading pad and in the stormwater drainage pipeline system.

e) Containerized Waste Management – the following locations are approved for management and storage of Class A waste received in containers (does NOT include waste received for disposal in the Containerized Class A West Facility):

- Containerized Waste Storage Pad
- Intermodal Unloading Facility
- ~~Railcar Rollover Facility~~
- East Truck Unloading Facility
- Decontamination Facilities (Box Wash, Rail Car Wash Track #2 and #4)
- Class A West Disposal Cell
- Shredder Facility
- Rotary Dump Facility

f) Bulk Waste Management – the following locations are approved for management and storage of bulk Class A waste:

- Intermodal Unloading Facility
- ~~Railcar Rollover Facility~~
- East Truck Unloading Facility (raised dock area excluded)
- Decontamination Facilities (Box Wash, Rail Car Wash Track #2 and #4)
- Class A West Disposal Cell
- Rail Digging Facility (bulk waste transfer only, waste storage prohibited)
- Shredder Facility in accordance with the State-issued Part B Permit and the TSCA Coordinated Approval

- Rotary Dump Facility

11. LARW, and Class A West Cell Collection Lysimeters: Operation, Maintenance and Annual Inspection

The Permittee shall operate and maintain all collection lysimeters in compliance with the currently approved Appendix C of this Permit. Said operation shall include at least an annual video log inspection of each collection lysimeter constructed at the LARW, and Class A West Cells. Each video inspection shall log the entire length of the drainage pipe to ensure proper operation and free drainage of each collection lysimeter. Failure to satisfactorily complete an annual video log inspection or a determination that free draining conditions no longer exist in a collection lysimeter shall constitute failure to maintain best available technology pursuant to Part I.G.4 of this Permit. Such failures shall be reported to the Director in accordance with the requirements of Part I.H.8 of this Permit.

12. Stormwater Drainage Works Performance Criteria

All stormwater drainage works constructed and operated at the LARW, Class A West, and 11e.(2) facilities shall perform in accordance with the following criteria:

a) Seepage Control to Prevent Ground Water Mounding – all drainage works at the facility shall be constructed of either low-permeability clay liner materials or of an impermeable man-made conveyance in order to control and prevent any alteration of local natural ground water hydraulic gradients or velocities. This infiltration control shall address seepage during periods of storm water storage in the drainage system.

b) Free Drainage – all stormwater drainage works shall be free draining and under gravity conditions shall convey stormwater from the contributing facilities to an off-site location, except as follows:

1. The stormwater culvert at the southeast margin of the 11e.(2) cell, as found on the Permittee's engineering drawing 9420-7D as listed in Table 5 of this Permit. Said construction includes an engineered catch basin and lift station.

c) Temporary Stormwater Drainage Works – plans and specifications for any temporary stormwater drainage works shall be submitted for Director review and approval prior to installation. As-Built reports shall be submitted for Director approval within 30 days following installation. Prior to site closure, the Permittee shall remove all temporary stormwater drainage works (e.g., drainage grates, piping, ditches, etc. not approved under Part I.D.4) as part of the site Decontamination and Decommissioning Plan required under Radioactive Material License, Condition 74.

13. Reserved

14. Wastewater Management Requirements

The Permittee shall operate and maintain all wastewater storage, treatment, and disposal facilities in accordance with Best Available Technology requirements approved by the Director, as follows:

a) 1995, 1997, 2000, Mixed Waste, and Northwest Corner Evaporation Ponds – the Permittee shall operate and maintain the 1995, 1997, 2000 , and Northwest Corner evaporation ponds and the Mixed Waste evaporation pond to prevent release of fluids to subsurface soils or groundwater, in accordance with the following requirements:

1) Leak Detection System Pumping and Monitoring Equipment Continuous Operation – the Permittee shall provide continuous operation of the leak detection system pumping and monitoring equipment, including, but not limited to, the submersible pump, pump controller, head/pressure transducer, and flow meter equipment approved by the Director. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery shall constitute failure of Best Available Technology and a violation of this Permit.

2) Maximum Allowable Daily Leakage Volumes – the Permittee shall, in accordance with the currently approved Appendix J of this Permit, measure the volume of all fluids pumped from the respective leak detection systems of the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds. Under no circumstance shall the leak detection system flow volume, as determined pursuant to Part I.F.13.a.3, exceed the following limits:

i.	1995 Evaporation Pond:	162 gallons/day
ii.	1997 Evaporation Pond:	171 gallons/day
iii.	Mixed Waste Evaporation Pond:	171 gallons/day
iv.	2000 Evaporation Pond:	382 gallons/day
v.	Northwest Corner Evaporation Pond:	326 gallons/day

Leak detection system flow volumes in excess of these limits shall constitute failure of Best Available Technology and a violation of this Permit.

3) Maximum Allowable Head – the Permittee shall measure fluid head in the respective leak detection sumps of the 1995, 1997, 2000, the Mixed Waste, and Northwest Corner evaporation ponds by use of pressure transducer equipment approved by the Director. Under no circumstance shall fluid head in the leak detection system sump exceed a 1-foot level above the lowest point in the lower flexible membrane liner. The occurrence of leak detection system fluid levels above this 1-foot limit

shall constitute failure of Best Available Technology and a violation of this Permit.

4) 2-foot Minimum Vertical Freeboard Criteria – the Permittee shall operate and maintain at least 24 inches of vertical freeboard in the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds to ensure total containment of fluids. This vertical distance shall be determined by use of a gauging station approved by the Director. If at any time the Permittee operates the pond with less than 24 inches of vertical freeboard, such operation shall constitute failure of Best Available Technology and a violation of this Permit.

5) Ancillary equipment intended to facilitate evaporation shall be constructed and operated in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

b) Box-Washing Facility – the Permittee shall operate and maintain the Box-Washing Facility to ensure:

1) Free draining conditions exist across the floor to the wastewater collection sumps.

2) The integrity of the concrete working surface to prevent discharge.

3) Water level is maintained below the collection sump grate.

4) Maintenance of a freeboard in each concrete wastewater storage tank (at or below three fourths full).

c) Rail Car Wash Facility – the Permittee shall operate and maintain the Rail Car Wash Facility on Track No. 4 in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

d) Clive facility - All contact water (stormwater or operational) shall not leave the restricted area within Section 32.

e) Mixed Waste Surface Impoundment - Pursuant to Part I.E.16 of this Permit the Permittee shall operate and maintain the Mixed Waste Surface Impoundment in accordance with the State-issued Part B Permit.

15. Filter Construction Settlement Performance Standards

Cover system filter placement shall begin only after the Permittee demonstrates that 95% of the maximum consolidation has been achieved at the upper surface of the radon barrier. Any filter construction undertaken without this demonstration and prior Director approval shall constitute a violation of this Permit.

16. Mixed Waste Cell BAT Performance and Best Management Practice Standards

Performance and best management practice standards for waste storage, and stormwater and wastewater storage, treatment, and disposal at the Mixed Waste Cell shall be defined by requirements mandated by the State-issued Part B Permit.

~~17. Railcar Rollover Facility BAT Performance and Best Management Practice Standards~~

~~The Permittee shall operate and maintain the railcar rollover facility to ensure the physical integrity of the asphalt ramps and concrete bays to prevent discharge to the subsurface. In accordance with the currently approved Appendix J of this Permit, inspections shall be documented to ensure compliance with the stormwater management requirements in Part I.E.7 of this Permit.~~

~~17. On an annual basis, during the second quarter of each year, the Permittee shall remove all waste from the facility, pressure wash all surfaces to remove all foreign material, and inspect the entire concrete bay and asphalt ramps of the rollover facility. The Permittee shall repair or otherwise seal and render impermeable any and all cracks, ruptures, damage, or porous areas prior to resuming use of the facility. The Permittee shall submit a written notice of inspection to the Director at least one week prior to the annual inspection to allow the Director the opportunity to have a DRC representative present.~~

17. Reserved

18. Evaluation of Effect of Proposed Pumping Well(s)

The Permittee will evaluate the effect of any proposed pumping well, at the facility, on the local ground water flow field and ground water monitoring. This evaluation will be undertaken with the use of analytical or numeric ground water flow models, which conform to the guidance provided to the Permittee by the Bureau of Radiation Control in the November 26, 1990 Notice of Deficiency, Comment WPC-1 K. The Permittee will submit the results of this evaluation and receive Director approval before any construction of the withdrawal well.

19. Management of 2000 Evaporation Pond Waste Material

The Permittee shall dispose of all waste material generated during the everyday use and operation of the pond in the Class A West Cell only. Waste material includes, but is not limited to: sludge, soil contaminated from spills or releases, miscellaneous debris, and material or equipment repaired or replaced such as synthetic liner, pumps, piping, cables, floats, etc. All material associated with the final demolition of the pond, including underlying contaminated soil, must be disposed of in the Class A West Cell and is expressly prohibited from disposal in the 11e.(2) cell.

20. Shredder Facility

The Permittee shall operate and maintain the Shredder Facility:

a) In accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

b) To ensure the physical integrity of all concrete surfaces to prevent discharge to subsurface soils or ground water.

c) On an annual basis during the second quarter of each year, the Permittee shall remove all waste from the Shredder Facility, pressure wash all surfaces to remove all foreign material, and inspect all concrete surfaces. The Permittee shall repair or otherwise seal and render impermeable any and all cracks, ruptures, damage, or porous areas prior to resuming use of the facility. At least one week prior to the annual inspection the Permittee will submit written notice to allow the Director the opportunity to have a DRC representative present.

d) To ensure free draining conditions exist over the entire concrete pad to each of the seven catch basins, and to ensure the water level in each catch basin is below its respective grate.

e) To ensure wastewater level in Manhole #1 is maintained at or below the invert to the outlet pipe, and free draining conditions exist in the conveyance pipe to the Rotary Dump Sediment Basin.

21. Rotary Dump Facility

The Permittee shall operate and maintain the Rotary Dump Facility:

a) In accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

b) To ensure the physical integrity of all concrete surfaces to prevent discharge to subsurface soils or ground water.

c) On an annual basis during the second quarter of each year, the Permittee shall remove all waste from the Rotary Dump Facility and pressure wash all surfaces to remove all foreign material, and inspect all surface areas of the concrete access drives and concrete floor of the Rotary Dump Building. The Permittee shall repair or otherwise seal and render impermeable any and all cracks, ruptures, damage, or porous areas prior to resuming use of the facility. At least one week prior to the annual inspection, the Permittee shall submit written notice to allow the Director the opportunity to have a DRC representative present.

d) To ensure that free draining conditions exist in all wastewater transfer pipes without release or discharge to subsurface soils or ground water.

e) To ensure the leak detection annulus of the sediment basin is free of fluids.

f) To ensure the water level in the sediment basin is below the level of the grate covering the pump sump.

g) The dual-walled pipe used to transfer fluids from the sediment basin is free draining, and the leak detection annulus within the secondary pipe is free of fluids.

22. Intermodal Container Wash Building

The Permittee shall operate and maintain the Intermodal Container Wash Building:

a) In accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

b) To ensure free draining conditions exist:

i. Within each wash bay and trench drain to the sediment basin, and

ii. From each boot wash station to the sediment basin.

c) To ensure the integrity of all concrete surfaces to prevent discharge of waste water to subsurface soils or ground water.

d) To ensure the sediment basin provides a total containment system and does not cause a direct or in-direct discharge to subsurface soils or ground water.

e) To ensure the water level in the sediment basin is always maintained below the grate located over the pump sump.

f) To ensure the leak detection annulus of the sediment basin is free of liquids.

g) To ensure the dual-walled pipe used to transfer fluids from the sediment basin is free draining, and the leak detection annulus within the secondary pipe is free of fluids.

23. Decontamination Access Control Building

The Permittee shall operate and maintain the Decontamination Access Control Building:

a) In accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

b) To ensure free draining conditions exist from the bootwash and all graywater lines (i.e., eyewash, emergency shower, respirator wash sink, etc.) to the underground wastewater collection tank located outside the southeast corner of the building.

c) To ensure the dual-walled leak detection annulus of the wastewater collection tank is maintained free of fluids.

d) To ensure the fluid level in the wastewater collection tank is maintained below the invert of the inlet pipe.

e) To ensure the dual-walled piping from the wastewater collection tank to the 1997 Evaporation Pond via the East Side Drainage System is free draining and the leak detection annulus within the secondary pipe remains free of fluids.

24. East Side Drainage Project

The Permittee shall operate and maintain the East Side Drainage Project:

a) In accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively, of the Permit.

b) To ensure the leak detection annulus of the dual-walled piping system is always maintained free of fluids, including the drip pans found inside manholes #1 and #2.

c) To ensure the fluid level in the 11 stormwater catch basins is always maintained below the level of their respective outlet pipes.

d) To ensure the stormwater, graywater, and wastewater piping throughout the entire East Side Drainage Project remains free draining at all times.

e) To ensure the fluid level in the stormwater lift sump is always maintained below the level of the inlet piping.

25. Horizontal Hydraulic Gradient Performance Standard

The Permittee shall operate the facility to prevent the shallow aquifer horizontal hydraulic gradient, based on fresh water equivalent ground water elevations, of any sub area, from exceeding the cell-specific Horizontal Hydraulic Gradient Limits specified in Part I.H.2.(d) of this Permit. Said performance standard for horizontal hydraulic gradient at the LARW Cell shall become effective after 1.5 years from the effective date of this Permit Modification.

The Permittee shall operate and maintain the stormwater culvert, catch basin, and lift station at the southeast margin of the 11e.(2) cell to transfer stormwater in an un-interrupted manner to the Southwest Pond, in accordance with a currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively, of this Permit.

26. Vertical Hydraulic Gradient Performance Standard

The Permittee shall maintain a neutral or upward hydraulic gradient in all nested or paired monitoring wells at the facility required by Part I.H.2[c] of this Permit. Said neutral hydraulic gradient is defined as equal freshwater elevation in both wells of the pair, pursuant to Part I.H.2(a) of this Permit. Upward hydraulic gradient is defined as a condition where the deeper well of the pair exhibits a higher or greater freshwater elevation than the shallow well. For well pair GW-19A and GW-19B, this performance standard shall become effective after completion of the shallow aquifer de-watering required by Part I.I.2 of this Permit.

27. DU Storage Building Performance Standard

The Permittee shall operate and maintain the DU Storage Building:

a) In accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan, Appendices J and K, referenced in Part I.I.5 of this Permit.

b) To maintain the building floor at the approved design grade, and in a sound, undamaged, water tight physical condition.

c) To prevent physical contact of any DU waste material or liquids therein with the building's asphalt floor.

d) To ensure the physical integrity of the building's asphalt floor to contain and control any waste leakage due to container damage, degradation or spills.

e) To prevent any physical contact of any precipitation, run-on, or other water with the DU waste.

f) To ensure the physical integrity of the walls and roof of the building to prevent the contact of precipitation with the DU containers and waste therein.

g) To maintain all DU containers in a closed, strong tight and water tight condition.

h) To prevent the occurrence or presence of any water on the building floor at any time.

F. Compliance Monitoring

1. Compliance Monitoring Wells

Ground water monitoring wells used as compliance monitoring points shall meet the following requirements:

a) LARW, Class A West, and 11e.(2) Compliance Monitoring Wells – the following wells shall be sampled and analyzed for purposes of compliance monitoring

1) LARW Cell – existing wells GW-128, GW-16R, GW-20, GW-22, GW-23, GW-24, GW-29, GW-56R, GW-64, GW-77, GW-103, GW-104, and GW-105.

2) 11e.(2) Cell – existing wells GW-19A, GW-20, GW-24, GW-25, GW-26, GW-27, GW-28, GW-29, GW-36, GW-37*, GW-38R*, GW-57, GW-58, GW-60, GW-63, GW-126, GW-127 and piezometer PZ-1*. * Wells 37, 38R, and piezometer PZ-1 shall be monitored only for ground water elevations.

3) Class A West Cell – existing wells GW-88, GW-89, GW-90, GW-91, GW-92, GW-93, GW-25, GW-94, GW-26, GW-95, GW-27, GW-99, GW-100, GW-101, GW-102 GW-106, GW-107, GW-108, GW-142, GW-143, GW-144, GW-145, GW-146, GW147, GW-148, GW-149, and GW-150.

b) Mixed Waste Cell Compliance Monitoring Wells (radiologic contaminants only) – the following wells shall be sampled and analyzed for purposes of compliance monitoring: GW-133, GW-134, GW-135, GW-136, I-1-30, GW-151, GW-152, GW-153, GW-154, and I-3-30*.

* Well I-3-30 shall be monitored only for ground water elevations.

c) Evaporation Pond Monitoring Wells – monitoring wells P3-95 NECR, P3-95 SWC, and P3-97 NECR shall be sampled and analyzed for purposes of compliance monitoring for the 1995 and 1997 Ponds, well GW-66R shall be sampled and analyzed for purposes of compliance monitoring for the Mixed Waste Pond, and wells GW-19A, GW-36, and GW-58 shall be sampled and analyzed for purposes of compliance monitoring for the 2000 Evaporation Pond in addition to the 11e.(2) cell. Monitoring well GW-129 shall be sampled and analyzed for purposes of compliance monitoring for the Northwest Corner Evaporation Pond.

d) Deep Aquifer Monitoring Wells– the Permittee shall monitor heads in all deep aquifer monitoring wells, including, but not limited to monitoring wells I-1-100, GW-19B, GW-27D, GW-148D, and GW-153D.

e) Well Construction Criteria – any ground water monitoring well used as a compliance monitoring point shall be:

1) Located hydrologically downgradient of waste disposal,

2) Completed exclusively in the uppermost aquifer,

3) Located as close as practicable to the waste and no more than 90 feet from edge of waste,

4) Constructed in conformance to guidelines found in the EPA RCRA Ground Water Monitoring Technical Enforcement Guidance Document, 1986, OSWER-9950.1.

f) Well Network Early Warning Requirement – any network of ground water monitoring wells used as points of compliance shall be adequately constructed, both in location and spacing, to provide early warning of a contaminant release from a waste embankment before the contaminant leaves the embankment's 100-foot wide buffer zone, as defined in Table 7, below. For purposes of this Permit, early warning shall be provided by a compliance monitoring well network with an inter-well spacing distance to be approved by the Director.

g) Buffer-Zone Requirements– waste disposal is prohibited inside the buffer zone, as described in Tables 3 and 7 of this Permit.

Table 7: Buffer Zone Boundary Locations

Disposal Cell	Edge of Buffer Zone Position	Coordinates	
		Latitude	Longitude
LARW	NW Corner	40° 41' 12.366" N	113° 06' 52.622" W
	SW Corner	40° 40' 51.915" N	113° 06' 52.494" W
	SE Corner	40° 40' 51.976" N	113° 06' 35.429" W
	NE Corner	40° 41' 12.427" N	113° 06' 35.556" W
Class A West	NW Corner	40° 41' 40.599" N	113° 07' 26.054" W
	SW Corner	40° 41' 13. 245" N	113° 07' 25. 996" W
	SE Corner	40° 41' 13.201" N	113° 06' 54.167" W
	NE Corner	40° 41' 40.556" N	113° 06' 54.165" W
11e.(2)	NW Corner	40° 41' 13.587" N	113°0 7' 25.832" W
	SW Corner	40° 40' 54.077" N	113° 07' 26.070" W
	SE Corner	40° 40' 53.849" N	113° 06' 54.279" W
	NE Corner	40° 41' 13.359" N	113° 06' 54.037" W

h) Protection of Monitoring Network – all compliance monitoring wells must be protected from damage due to surface vehicular traffic or contamination due

to surface spills. All monitoring wells shall be maintained in full operational condition for the life of this Permit.

The criteria for determining full operational condition are:

1) Accessibility – each well must be accessible for sampling and shall not be located in an area of standing water.

2) Casing Measuring Point – each well shall have a permanent surveyed reference point such as the top of the protective casing.

3) Physical Integrity – any physical disturbance to any well, which may alter the surveyed water level measuring point, is prohibited. In addition, all wells shall have an adequate surface seal around the well casing to prevent surface or storm water from entering the well.

4) Chemical Integrity – all well and sampling materials shall be constructed of inert materials to prevent the introduction of contaminants from leaching or corrosion.

5) Silt Content – if the measured water column of any well is less than 90% of the theoretical water column, the monitoring well shall be redeveloped prior to sampling.

Any well that becomes damaged beyond repair or is rendered unusable for any reason will be replaced by the Permittee within 90 days or as directed by the Director.

i) Notification of Ground-water Monitoring Event

At least 30 calendar days prior to the annual Ground Water Monitoring Event, required under Part I.H.1, the Permittee will submit a written notice and schedule, with approximate dates wells will be sampled, to the Director. This allows the DRC the opportunity to collect duplicate or split ground-water samples from the same wells at the same time as the Permittee's staff during a regularly scheduled sampling event for independent laboratory analysis.

2. <u>BAT Compliance Monitoring Points</u>

The Permittee shall inspect, sample, analyze, or otherwise monitor other points of compliance in order to confirm compliance with this Permit. These points or instruments shall include:

a) East Truck Unloading Area – including monitoring of free draining conditions to the stormwater collection troughs, water level in the collection troughs, and physical condition/integrity of all exposed asphalt and concrete surfaces.

b) LARW, and Class A West Cell Collection Lysimeters – all collection lysimeters constructed at the LARW, and Class A West Cells in accordance with the requirements of Part I.D.10 of this Permit.

c) LARW Containerized Waste Storage Pad – including monitoring of water in the stormwater collection sump and physical condition of containers on the pad.

d) 1995, 1997, 2000, Mixed Waste, and Northwest Corner Evaporation ponds – including monitoring of: 1) vertical freeboard at the water level gauging stations approved by the Director, 2) operational status and required BAT performance parameters of all leak detection pump-back system equipment, including but not limited to, leak detection system pump, head pressure transducer, and flow meters required by Part I.E.14 of this Permit and approved by the Director.

e) Intermodal Unloading Facility – including monitoring of free draining conditions at both the unloading pad and throughout the length of the contact stormwater drainage discharge pipeline that discharges to the 1995 and 1997 evaporation ponds.

f) Box-Washing Facility – including monitoring of free draining conditions, physical condition and integrity of concrete floor and floor sumps, sump pump in floor sump is operational, free drainage is maintained through the pipeline discharging wastewater into the concrete holding tanks, and water level in concrete holding tanks is maintained at or below three-quarters full.

g) Track No. 4 and Track No. 2 Rail Car Wash Facilities – including monitoring of free draining conditions and physical condition and integrity of rail bay concrete floor, floor sumps, conveyance pipe, Collected Water Receiver Tank, Filtered Water Storage Tank, and concrete secondary containment vault.

h) Rail Digging Facility – including monitoring of free draining conditions to the concrete collection basins and throughout the drainage system after the collection basins, and physical integrity of the asphalt and concrete surfaces.

i) Shredder Facility – including monitoring to determine:

   1) Free draining conditions throughout the concrete surfaces to the seven catch basins,

   2) Physical integrity of all concrete surfaces,

   3) Water level at each catch basin and manhole, and

   4) Free draining conditions of all wastewater transfer piping.

j) Rotary Dump Facility – including monitoring to determine:

   1) Free draining conditions, physical condition, and integrity of all concrete surfaces,

   2) Presence or absence of fluids in the Sediment Basin leak detection annulus,

   3) Water level in the sediment basin,

   4) Free draining conditions in all wastewater transfer piping, and

5) Presence or absence of fluids in the leak detection annulus within the secondary pipe of all dual-walled wastewater transfer piping systems.

k) Intermodal Container Wash Building – including monitoring to determine:

1) Free draining conditions, physical condition, and integrity of concrete floor and floor trenches,

2) Presence or absence of fluids in the sediment basin leak detection annulus,

3) Fluid level in the sediment basin, and

4) Presence or absence of fluids in the leak detection annulus within the secondary pipe of all dual-walled wastewater transfer piping systems.

l) Decontamination Access Control Building – including monitoring to determine:

1) Free draining conditions in all wastewater transfer piping,

2) Presence or absence of fluids in the gray water collection tank leak detection annulus,

3) Water level in the gray water collection tank, and

4) Presence or absence of fluids in the leak detection annulus within the secondary pipe of all dual-walled wastewater transfer piping systems.

East Side Drainage Project - including monitoring to determine the presence or absence of fluids in the leak detection annulus within the secondary piping of all dual-wall wastewater transfer systems. All dual-walled pressurized pipe connected to the East Side Drainage Project, that does not gravity drain to a leak detection port, including both primary and secondary piping, shall be pressure tested annually in accordance with the currently approved BAT Performance Monitoring Plan in Appendix J of this Permit.

3. Future Modification of Compliance Monitoring Systems or Equipment

If at any time the Director determines that additional systems, mechanisms or instruments are necessary to monitor ground water quality or Best Available Technology compliance at the facility, the Permittee shall submit within 30 days of receipt of notification, a plan and compliance schedule to modify the compliance monitoring equipment, for Director approval. Any failure to construct the required compliance monitoring system or equipment in accordance with the approved plan and schedule shall constitute a violation of this Permit.

4. Compliance Monitoring Period

Monitoring shall commence upon issuance of this Permit, or upon:

a) Completion of each collection lysimeter in accordance with Part I.D. 10 of this Permit and

b) Completion of the soil moisture instrumentation required by Part I.E.4.

Thereafter, compliance monitoring shall continue through the life of the Permit.

5. Monitoring Requirements and Frequency

Measurements or analysis done for monitoring will be conducted in compliance with the requirements below, and reported to the Director as per the requirements of Part I.H.

a) Water Level Measurements – water level measurements shall be made monthly in each monitoring well and piezometer listed in Part I.F.1. Measurements made in conjunction with annual ground water sampling shall be completed prior to any collection of ground water samples in accordance with the currently approved Water Monitoring Quality Assurance Plan in Appendix B of this Permit. These measurements will be made from a permanent single reference point clearly demarcated on the top of the well or surface casing. Measurements will be made to the nearest 0.01 feet.

b) Specific Gravity Measurements – ground water-specific gravity measurements shall be made annually in each monitoring well and piezometer in conjunction with each annual ground water quality sampling event.

c) Ground Water and Pore Water Quality Sampling and Analysis – except for arsenic and molybdenum, grab samples of ground water from compliance monitoring wells and pore water from lysimeters (as available) will be collected for chemical analysis on an annual basis, in conformance with Part II.A and B and the currently approved Water Monitoring Quality Assurance Plan in Appendix B of this Permit.

1) Ground/Pore Water Analytical Methods – methods used to analyze ground water samples must comply with the following:

vi. Are methods cited in UAC R317-6-6.3A(13) or have been approved by the Director in the currently approved Water Monitoring Quality Assurance Plan, Appendix B of this Permit, and

vii. Have detection limits which do not exceed the Ground Water Quality Standards or Protection Levels listed in Tables 1A and 1C of this Permit.

2) Analysis Parameters – the following analyses will be conducted on all samples collected for ground water monitoring:

i. Field Parameters – dissolved oxygen, pH, temperature, specific gravity, and specific conductance.

ii Laboratory Parameters – including:

- General Inorganic Parameters: Chloride, Sulfate, Carbonate, Bicarbonate, Sodium, Potassium, Magnesium, Calcium, bromide, iron, and total anions and cations
- General Radiologic Parameters: potassium-40, gross beta
- All Protection Level Parameters – individual analysis for all parameters found in Part I.C, Tables 1A, 1B, 1C, 1D, 1E, and 1F of this Permit

3) Arsenic and Molybdenum – arsenic and molybdenum samples will be collected for chemical analysis at the time of Permit renewal and reported with the application for Permit Renewal.

6. Collection Lysimeter Sampling

Collection lysimeter sampling shall be conducted in compliance with the currently approved Water Monitoring Quality Assurance Plan approved by the Director, as provided in Appendix B of this Permit. Sample analysis shall conform to the requirements of Part I.F.5(c) of this Permit.

Water quality samples shall be collected within 24 hours of initial discovery of fluid. The priority of sample parameters shall conform to the currently approved Appendix C of this Permit, with special emphasis on selection of mobile and predominant contaminants found within the capture area of the lysimeter.

7. Modification of Monitoring or Analysis Parameters

If at any time the Director determines the monitoring or analysis parameters to be inadequate, the Permittee shall modify all required monitoring parameters immediately after receipt of written notification from the Director. Upon any change in the currently approved waste parameters defined in Conditions 6, 7, and 8 of the Utah Radioactive Material License UT 2300249, the Permittee shall revise the currently approved Water Monitoring Quality Assurance Plan in Appendix B.

8. Waste Characterization Monitoring

a) Class A Waste – all Class A waste received by the Permittee shall be fully characterized to determine its chemical and radiological constituents and the presence and concentration of any chelating agents both before shipment and emplacement for disposal, in accordance with the requirements of the currently approved Waste Characterization Plan in the Radioactive Material License UT 2300249, Condition 58 and for PCB/Radioactive Waste, in the currently approved State-issued Part B Permit. Said waste characterization shall include sampling and analysis of all contaminants authorized by Part I.E.1 and of those prohibited by Part I.E.2 of this Permit.

b) 11e.(2) Waste – all 11e(2) Waste received by the Permittee shall be fully characterized both before shipment and after arrival at the facility to identify any new non-radiologic contaminants not authorized by this Permit

by Parts I.E.2 and I.E.5. Said waste characterization shall include sampling and analysis of all non-radiologic contaminants prohibited by Part I.E.2 of this Permit.

The Permittee shall maintain records of all Class A, and 11e.(2) Waste sampling and analysis on site.

9. Waste Liquid Content Monitoring

All wastes received shall be tested for liquids in accordance with the currently approved LLRW Waste Characterization Plan in the Radioactive Material License, Condition 58. In accordance with UAC R313-15-1008(2)(a)(iv), solid waste received for disposal shall contain as little free-standing and non-corrosive liquid as reasonably achievable, but shall contain no more free liquids than 1% of the volume of the waste. In the event that solid waste is received or observed to contain free liquids in excess of 1% by volume, the Licensee/Permittee shall immediately notify the Division of Radiation Control that the shipment(s) failed the requirements for acceptance.

10. Post-Closure Monitoring

Post-closure monitoring shall conform to the requirements of the currently approved Post-Closure Monitoring Plan in Appendix F of this Permit.

11. On-Site Meteorological Monitoring

The Permittee shall provide continuous monitoring of the following minimum meteorological parameters, in accordance with the currently approved Weather Station Monitoring Plan found in Appendix G of this Permit:

a) Wind direction and speed

b) Temperature

c) Daily Precipitation

d) Pan evaporation

The Permittee shall maintain records of this monitoring on site. The Permittee shall submit an annual meteorological report for the facility in compliance with the requirements of Part I.H.10 of this Permit.

12. Containerized Waste Storage Areas: Leakage/Spill Monitoring and BAT Status

The Permittee shall conduct inspections of the containerized waste storage areas in order to remediate any container leakage or spillage in accordance with the currently approved BAT Performance Monitoring Plan in Appendix J of this Permit. Said inspections shall also evaluate compliance with the Best Available Technology requirements of Part I.E.10 of this Permit. The Permittee shall maintain a written record of these inspections on site. All daily inspection records shall comply with the requirements of Part II.G of this Permit.

13. Evaporation Ponds Monitoring

a) 1995, 1997, 2000, Mixed Waste, and Northwest Corner Evaporation Pond Daily Monitoring – the Permittee shall conduct inspections in accordance with the currently approved Appendix J of this Permit, of the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds to determine compliance with the Best Available Technology requirements of Part I.E.14.a of this Permit, including:

1) Visual observation of pond water level, relative to pond spillway centerline, to evaluate pond freeboard compliance against BAT performance criteria.

2) Determination of operational status of leak detection system pump, pump controller, head/pressure transducer, and flow meter equipment.

3) Measurement of daily leak detection system flow volume. For BAT compliance monitoring purposes for the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds, the Permittee shall calculate an average daily leakage volume across a consecutive 7-day period. The Permittee shall perform this calculation, for each evaporation pond, weekly.

4) Measurement of daily leak detection system head. For BAT compliance monitoring purposes for the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds, the Permittee shall determine the maximum head limit to be measured by the approved head/pressure transducer construction that complies with the 1-foot BAT head performance standard of Part I.E.14.a.3. On a daily basis, the Permittee shall compare the daily measured head against the maximum head limit for each evaporation pond.

The Permittee shall maintain written records of the findings of these daily inspections on site. All daily inspection records shall comply with the requirements of Part II.G of this Permit.

b) 1995, 1997, 2000, Mixed Waste, and Northwest Corner Evaporation Pond Leak Detection System Pump Tests – the Permittee shall conduct a pump test of the evaporation pond's leak detection sump within 5 days of discovery that the average daily leak detection system flow volume (Part 1.F.2.d) exceeds the following limits:

1)	1995 Evaporation Pond:	155 gallons/day
2)	1997 Evaporation Pond:	160 gallons/day
3)	Mixed Waste Evaporation Pond:	160 gallons/day
4)	2000 Evaporation Pond:	355 gallons/day
5)	Northwest Corner Evaporation Pond:	300 gallons/day

Said pump test shall comply with the currently approved BAT Contingency Plan in Appendix K of this Permit.

c) Annual Monitoring – on an annual basis, the Permittee shall:

1) Collect water quality samples from fluids stored in the approved evaporation ponds.

2) Analyze said water samples for all ground water quality protection level parameters defined in Part I.F.5.c.2, above, including a complete gamma spectroscopic analysis.

Sampling and analyses at all evaporation ponds shall comply with the currently approved Water Monitoring Quality Assurance Plan in Appendix B of this Permit.

d) Annual Pump Inspection – on an annual basis, the Permittee shall remove the submersible pump from the leak detection system of the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds and check both the winding resistance and insulation resistance. If either the winding resistance or insulation resistance is outside of the manufacturer specifications, the pump will be replaced and/or repaired with a pump that satisfies all manufacturer specifications within 24 hours. Within 30 days of completing the annual pump inspection, a bor-o-scope video inspection shall be performed to ensure the pump was correctly reinstalled.

14. Confined Aquifer Head Monitoring

The Permittee shall conduct monthly monitoring of water levels and annual specific gravity measurements in all wells completed in the deep confined aquifer, including, but not limited to: I-1-100, GW-153D, GW-19B, GW-148D, and GW-27D. Annual water levels and specific gravity measurements shall be made in conjunction with the annual ground water quality sampling event.

15. Mixed Waste Leachate Monitoring

On an annual basis, the Permittee shall collect representative samples of leachate from the Mixed Waste Cell leachate collection system (upper leachate collection access pipe) and analyze for radioactive contaminants. If no leachate is present during the annual sampling event, no sample is required. Said radioactive contaminants shall include:

a) All Ground Water Protection Level Parameters found in Tables 1E and 1F of this Permit

b) A complete gamma spectroscopic analysis to determine all other gamma-emitting radioisotopes that may be present

16. Intermodal Unloading Facility Monitoring

The Permittee shall conduct monitoring, in accordance with the currently approved Appendix J of this Permit, of the Intermodal Unloading Facility to determine and ensure free draining conditions exist both on the unloading pad and

across the contact stormwater drainage pipeline that discharges to the 1995 and 1997 evaporation ponds. The Permittee shall maintain written records of the findings of these daily inspections on site. All daily inspection records shall comply with the requirements of Part II.G of this Permit.

17. Box-Washing Facility Monitoring

The Permittee shall conduct monitoring, in accordance with the currently approved Appendix J of this Permit, of the Box-Washing facility to demonstrate compliance with the Best Available Technology requirements of Part I.E.14.b of this Permit, including:

a) Free draining conditions

b) Physical integrity of concrete surfaces

c) Wastewater catch basin (sump) water level

d) Water level in wastewater storage tanks

e) Absence of discharge to the ground or ground water

The Permittee shall maintain written records of the findings of these daily inspections on site. All daily inspection records shall comply with the requirements of Part II.G of this Permit.

18. Rail Car Wash Facility Monitoring

The Permittee shall conduct monitoring of the Track No. 4 facility to demonstrate compliance with the Best Available Technology requirements of Part I.E.14.d of this Permit in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit.

The Permittee shall maintain written records of the findings of these daily inspections on site. All daily inspection records shall comply with the requirements of Part II.G of this Permit.

~~19.~~ Reserved ~~Railcar Rollover Facility Monitoring~~

19. ~~The Permittee shall conduct monitoring of the Railcar Rollover Facility to demonstrate compliance with the BAT Performance and Best Management Practice Standards of Parts I.E.7 and I.E.17 of the Permit in accordance with the currently approved BAT Performance Monitoring Plan and Contingency Plan in Appendices J and K, respectively, of this Permit.~~

20. Open Cell Time Limit Monitoring

The Permittee shall demonstrate compliance with the open cell time limitation requirements of Part I.E.6 of this Permit by observing and recording the following dates of completion for each working area in the Class A West cell:

a) Initial placement of waste on the first lift on the clay liner

b) Completion of construction of the clay radon barrier

The Permittee shall maintain written records of this monitoring on site. All monitoring records shall comply with the requirements of Part II.G of this Permit.

21. Reserved

22. BAT Performance Monitoring Plan

The Permittee shall demonstrate compliance with the BAT requirements and performance standards and Best Management Practices in Parts I.D and I.E of this Permit by implementing the most current BAT Performance Monitoring Plan approved by the Director and provided in Appendix J of this Permit.

23. BAT Contingency Plan

In the event that BAT failure occurs at any facility, the Permittee shall implement the most current BAT Contingency Plan approved by the Director and provided in Appendix K of this Permit to regain the BAT requirements and performance standards and Best Management Practices specified in Parts I.D and I.E of this Permit.

24. Stormwater Monitoring

The Permittee shall demonstrate compliance with stormwater removal requirements of Part I.E.7 of this Permit by maintaining daily written records for stormwater management activities:

a) Date, time, and location of discovery of stormwater accumulation

b) Date and time when stormwater removal activities were initiated at each location

c) Date and time when stormwater removal was completed at each location

d) First and last name(s) of all personnel involved with stormwater removal activities

e) Unique identity of locations of where stormwater was removed

f) Type of stormwater removed: contact or non-contact stormwater

g) Identify equipment used to remove contact and non-contact stormwater

h) Volumes of stormwater removed at each location

i) Location(s) where stormwater was disposed

25. Shredder Facility

The Permittee shall conduct monitoring of the Shredder Facility to demonstrate compliance with the Best Available Technology requirements of Part I.E.20 of this Permit in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K of this Permit, respectively, including:

a) Free draining conditions

b) Physical integrity of concrete surfaces

c) Absence of discharge to the ground or ground water

The Permittee shall maintain written records of the findings of these inspections on site. All inspection records shall comply with the requirements of Part II.G of this Permit.

26. Rotary Dump Facility

The Permittee shall conduct monitoring of the Rotary Dump Facility to demonstrate compliance with the Best Available Technology requirements of Part I.E.21 of this Permit in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K of this Permit, respectively, including:

a) Free draining conditions

b) Physical integrity of concrete surfaces

c) Water level in Sediment Basin sump

d) Presence of fluids in the Sediment Basin leak detection system

e) Absence of discharge to the ground or ground water

f) Absence of fluid in annular space between the primary and secondary pipes of the leak detection system for pressurized pipes

The Permittee shall maintain written records of the findings of these inspections on site. All inspection records shall comply with the requirements of Part II.G of this Permit.

27. Intermodal Container Wash Building

The Permittee shall conduct monitoring of the Intermodal Container Wash Building to demonstrate compliance with the Best Available Technology requirements of Part I.E.22 of this Permit in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit, including:

a) Free draining conditions,

b) Physical integrity of concrete surfaces,

c) Water level in Settlement Basin,

d) Presence of fluids in the settlement basin leak detection system, and

e) Absence of discharge to the ground or ground water.

The Permittee shall maintain written records of the findings of these inspections on site. All inspection records shall comply with the requirements of Part II.G of this Permit.

28. Decontamination Access Control Building

The Permittee shall conduct monitoring of the Decontamination Access Control Building to demonstrate compliance with the Best Available Technology

requirements of Part I.E.23 of this Permit in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit, including:

a) Free draining conditions in all wastewater transfer piping,

b) Water level in the gray water collection tank,

c) Presence of fluids in the gray water collection tank leak detection annulus, and

d) Absence of discharge to the ground or ground water.

The Permittee shall maintain written records of the findings of these inspections on site. All inspection records shall comply with the requirements of Part II.G of this Permit.

29. East Side Drainage Project

The Permittee shall conduct monitoring of the East Side Drainage Project to demonstrate compliance with the Best Available Technology requirements of Part I.E.24 of this Permit in accordance with the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan in Appendices J and K, respectively of this Permit, including:

a) Free draining conditions in all wastewater transfer piping

b) Absence of fluids in the leak detection annulus within the secondary pipe of the dual-walled piping system, and

c) Absence of discharge to the ground or ground water.

30. DU Storage Building Monitoring

The Permittee shall conduct visual monitoring, in accordance with the currently approved Appendix J of this Permit,of the DU Storage Building to determine compliance with the BAT performance standards defined in Part I.E.27. This shall include, but is not limited to:

a) Verification of the physical integrity of the building floor, walls, and roof.
b) Determination of physical integrity of each DU waste container.
c) Verification of the lack of any water in the building.

In addition, if the Permittee discovers any failure of a waste container, or the DU Storage Building to meet the requirements in Parts I.E.27 or I.F.30, of this Permit, the Permittee shall:

a) Complete all corrective actions needed to repair and abate the problem within 24-hours of discovery, and

b) Determine the root cause of the problem(s) and complete all necessary action to prevent future occurrences of said problem(s) within 5 calendar days of said discovery. The Permittee shall maintain written records of all visual findings and corrective actions of this weekly inspection on site. All weekly inspection and corrective action records shall comply with the requirements of Part II.G of this Permit.

G. Non-Compliance Status. Ground Water Monitoring and Best Available Technology

1. Noncompliance with the Ground Water Protection Levels

Noncompliance with the ground water protection levels in Part I.C, Tables 1A, 1B, 1C, 1D, 1E, and 1F as applied to the compliance monitoring wells defined in Part I.F.1 of this Permit shall be defined as follows:

a) Monitoring for probable out-of-compliance shall be defined as any one sample in excess of the protection level in Tables 1A, 1B, 1C, 1D, 1E, or 1F of this Permit for any parameter from the same compliance monitoring well.

b) Out-of-Compliance Status –defined as two (2) consecutive samples in excess of the protection level in Tables 1A, 1B, 1C, 1D, 1E, or 1F of this Permit for any parameter from the same compliance monitoring well.

c) Other Methods to Determine Ground Water Quality Compliance Status – at the discretion of the Director, other methods may be employed to determine the compliance status of the facility with respect to ground water quality data, including:

1) Trend and/or Spatial Analysis – analysis of any contaminant concentration trend through time in a single compliance monitoring point, and /or spatial analysis of the same from any group of compliance monitoring points.
2) EPA RCRA Statistical Methods – other applicable statistical methods may be used to determine out-of-compliance status, as defined in the EPA document "Statistical Analysis of Ground Water Monitoring Data at RCRA Facilities", February 1989, or as amended.

2. Requirements for Ground Water Monitoring for Probable Out-of-Compliance Status

The Permittee shall evaluate the results of each round of ground water sampling and analysis to determine existence of probable out-of-compliance status as defined in Part I.G.1(a) of this Permit. Upon any determination that probable out-of-compliance status exists, the Permittee shall:

a) Notify the Director of the probable out-of-compliance (POOC) status within 30 days of the initial detection.

b) Immediately implement a schedule of quarterly ground water sampling and analysis for the well(s)/parameter(s) of concern, consistent with the requirements Part I.F.5(b) and the currently approved Water Monitoring Quality Assurance Plan, Appendix B of this Permit. This quarterly sampling will continue until the compliance status can be determined by the Director.

3. Requirements for Ground Water Out-of-Compliance Status

a) Notification and Accelerated Monitoring – the Permittee shall evaluate the results of each round of ground water sampling and analysis to determine existence of out-of-compliance status as defined in Part I.G.1(b) of this Permit. Upon any determination that an out-of-compliance status exists the Permittee shall:

1) Verbally notify the Director of the out-of-compliance status within 24 hours, and provide written notice within 5 days of the detection and

2) Immediately implement an accelerated schedule of monthly ground water monitoring of the monitoring wells of concern for the parameters in question. This monitoring shall continue for at least 2 months or until the facility is brought into compliance, as determined by the Director. At the discretion of the Director, the Permittee may be required to sample and analyze for additional inorganic, organic, or radiochemical parameters in order to determine the compliance status of the facility.

b) Source and Contamination Assessment Study Plan – within 30 days of the verbal notice to the Director required in Part I.G.3(a) of this Permit, the Permittee shall submit for Director approval an assessment study plan and compliance schedule for:

1) Assessment of the source or cause of the contamination and determination of steps necessary to correct the source.

2) Assessment of the extent of the ground water contamination and any potential dispersion.

3) Evaluation of potential remedial actions to restore and maintain ground water quality and ensure that the ground water standards will not be exceeded at the compliance monitoring wells, and best available technology will be reestablished.

c) Contingency Plan – in the event that Out-of-Compliance status is determined as per Part I.G.1(b) or (c), and upon written notification from the Director, the Permittee shall immediately implement the currently approved Contingency Plan in Appendix A of this Permit.

4. Definition and Requirements for Failure to Maintain Best Available Technology

a) Definition of Failure to Maintain Best Available Technology (BAT) Requirements – any violation of the BAT Design Standards in Part I.D, including design, design specifications, or construction requirements shall constitute failure to meet the best available technology requirements of this Permit. Any violation of the BAT Performance Standards in Parts I.D.1 or I.E shall also constitute failure to meet the best available technology requirements of this Permit

b) Requirements for Failure to Maintain Best Available Technology – in the event that the Permittee fails to maintain best available technology in accordance with Parts I.D and I.E, above, the Permittee shall:

1) Notify the Director verbally within 24 hours of discovery of the BAT failure, and provide written notice within 5 days of discovery.

2) Submit within 5 days of discovery a complete written description of:

i. The cause of the BAT failure,

ii. Any measures taken by the Permittee to mitigate the BAT failure,

iii. Time frame of the discovery of the BAT failure and any mitigation measures were implemented, and

iv. Evidence to demonstrate that any discharge or potential discharge caused by the BAT failure did not and will not result in a violation of UAC 19-5-107.

c) BAT Contingency Plan – in the event that Out-of-Compliance status is determined as per Part I.G.4(a) or by implementation of the currently approved BAT Performance Monitoring Plan in Appendix J of this Permit, the Permittee shall immediately implement the currently approved BAT Contingency Plan in Appendix K of this Permit.

5. Affirmative Defense Relevant to Best Available Technology Failures

In the event that a compliance action is initiated against the Permittee for violation of Permit conditions relating to best available technology, the Permittee may affirmatively defend against that action by demonstrating the following:

a) The Permittee submitted notification according to UAC R317-6-6.13,

b) The failure was not intentional or caused by the Permittee's negligence, either in action or in failure to act,

c) The Permittee has taken adequate measures to meet permit conditions in a timely manner or has submitted to the Director, for Director approval, an adequate plan and schedule for meeting permit conditions, and

d) The provisions of UAC 19-5-107 have not been violated.

H. Reporting Requirements

Notwithstanding any other environmental monitoring and reporting required by the Radioactive Material License, the Permittee shall submit the following reporting information.

1. Ground-Water Monitoring

Monitoring required in Part I.F of this Permit, shall be reported according to the following schedule, unless modified by the Director:

a) Routine Annual Monitoring

Time Period	Report Due By
January 1 thru December 31	March 1

b) Accelerated Monitoring

Monitoring required in Part I.G.2 and Part I.G.3 of this Permit, shall be reported on a semi-annual schedule according to the following schedule, unless modified by the Director:

Time Period	Report Due By
1st (January thru June)	September 1
2nd (July thru December)	March 1

The Permittee shall include within the written report a summary table of wells, sampling dates, analytes, and any other constructive information concerning all wells in accelerated monitoring. A more detailed discussion of each analyte and associated well will also be provided in the report.

2. Water Level Measurements

The Permittee shall comply with the following ground water level reporting requirements:

a) General Requirements – monthly water level measurements from all ground water monitoring wells will be reported annually in both measured depth to ground water and saline ground water elevations above mean sea level. In addition, annual freshwater equivalent head elevations will be reported for each well and will be derived from annual ground water specific gravity measurements made in that well during each annual sampling event.

b) Maps and Diagrams Format – distribution of freshwater equivalent head shall be summarized on an annual basis in the form of monthly potentiometric maps of the uppermost aquifer for each water level measurement event, and shall be submitted with the annual monitoring report required by Part I.H.1

c) Vertical Hydraulic Gradient Reporting – on a monthly basis the Permittee shall calculate and provide summaries of head data for each intermediate /

shallow aquifer nested well group, including but not limited to: I-1-30 / I-1-100, GW-153 / GW153D, GW-19A / GW-19B, GW-27/GW-27D, and GW-148/GW-148D. Said summaries shall include measured water level depth, calculations of ground water level elevations, both saline and fresh water equivalents, in both the shallow and confined aquifers for each water level measurement event and include calculations of both the saline and fresh water equivalent vertical gradients (ft/ft) for each nested well group. These summaries shall be submitted with the annual monitoring report as required by Part I.H.1.

d) Horizontal Hydraulic Gradient Reporting – on a monthly basis the Permittee shall calculate the following and provide within the annual monitoring report as required by Part I.H.1:

1) A site-wide summary of maximum, minimum, and average horizontal hydraulic gradient for all wells located in Section 32 based on saline and fresh water equivalent ground water elevations and

2) Individual disposal cell summary of maximum, minimum, and average horizontal hydraulic gradient based on saline and fresh water equivalent ground water elevations for the Class A West LARW, 11e.(2), and Mixed Waste disposal facilities. Determination of these individual hydraulic gradients shall be made after division of each disposal cell into smaller sub-areas for purposes of hydraulic gradient comparisons through time, as approved by the Director. On an individual cell basis, the Permittee shall identify the cell sub-areas where the monthly maximum, minimum, and average hydraulic gradients occurred, as summarized in the August 31, 2004 letter response from Envirocare of Utah Inc. to DRC comments regarding the 2003 2nd Semi-Annual Ground Water Report.

In the event that the average fresh water equivalent horizontal hydraulic gradient of any sub-area exceeds the cell-specific Permit limit listed below, the Permittee shall report and identify the sub-area in which the exceeded limit occurred within the annual ground water monitoring report required by Part I.H.1 of this Permit.

Disposal Cell	Fresh Water Equivalent Horizontal Hydraulic Gradient Limit
Class A West	1.00E-3
LARW	9.67E-4
Mixed Waste	9.67E-4
11e.(2)	3.29E-3

3. Ground Water and Pore Water Quality Sampling

Reporting will include:

a) Field Data Sheets – or copies thereof, including the field measurements, required in Part I.F.5(c)(2) of this Permit, and other pertinent field data, such as:

1) Ground Water Monitoring – well name/number, date and time, names of sampling crew, type of sampling pump or bail, measured casing volume, volume of water purged before sampling, volume of water collected for analysis.

b) Results of Ground Water, Pore Water, and Surface Water Analysis – including date sampled, date received; and the results of analysis for each parameter, including: value or concentration, units of measurement, reporting limit (minimum detection limit for the examination), analytical method, the date of the analysis, counting error for each radiochemical analysis, and total anions and cations for each inorganic analysis.

c) Quality Assurance Evaluation – with every sampling report the Permittee shall include a quality assurance evaluation of the reported ground water and pore water data. Said report shall evaluate the sample collection techniques, sample handling and preservation, and analytical methods used in sampling with the objective of verifying the accuracy of the compliance monitoring results.

d) Electronic Data Files and Format – in addition to written results required for every sampling report, the Permittee shall provide an electronic copy of all laboratory results for ground water, pore water, and surface water quality sampling. Said electronic files shall consist of a Comma Separated Values (CSV) file format, or as otherwise approved by the Director.

4. Spill Reporting

The Permittee shall report as per UAC 19-5-114, any spill or leakage of waste or waste liquids which come in contact with native soil or ground water in compliance with Part II.I of this Permit. For spills of solid waste greater than 100 kg, the spill must be reported to the Division of Radiation Control within 7 calendar days of discovery.

5. Post-Closure Monitoring

Reporting of post-closure monitoring shall comply with the requirements of the currently approved Post-Closure Monitoring Plan in Appendix F of this Permit.

6. Annual "As-Built" Report

The Permittee shall submit an annual "As-Built" Report to document interim construction of the Class A West, and 11e.(2) Disposal cells in compliance with the currently approved design and specifications and LLRW and 11e.(2) Construction Quality Assurance/Quality Control Manual (Radioactive Materials License, Condition 44). These reports will be submitted for the Director's approval on or before December 1of each calendar year, and will be prepared in accordance with the LLRW and 11e.(2) Construction Quality Assurance/Quality Control Manual.

7. Waste Characterization Reporting

In the event that a new contaminant is detected in any waste at the facility, which has not been authorized by Part I.E.1, or if concentrations of approved contaminants are detected above the limits established in Part I.E.2 of this Permit, the Permittee shall notify the Director in writing within 7 calendar days from the date of discovery.

8. Collection Lysimeter Reporting

The Permittee shall provide a verbal report to the Director within 24 hours of discovery of the presence of any fluid in the standpipe of the collection lysimeters. The Permittee shall provide a written report of the incident to the Director within 7 calendar days of discovery. The Permittee shall provide a report of the annual video log survey of the lysimeter's drainpipe, as required by the currently approved Appendix C of this Permit, on or before December 31 of each calendar year.

9. Reporting of Mechanical Problems or Discharge System Failures

The Permittee shall verbally notify the Director within 24 hours of initial discovery of any mechanical or discharge system failure that could affect the chemical characteristics or volume of the discharge. The Permittee shall submit a written report of the failure within 7 calendar days of said failure.

10. Meteorological Reporting

On or before March 1 of each calendar year, the Permittee shall submit an annual meteorological report for the previous meteorological year (January 1 to December 31) for Director approval.

The objective of this report shall be to show that the meteorological assumptions made in the infiltration and unsaturated zone modeling used to support issuance of the Permit were conservative or representative of the actual conditions at the site. In addition, and in conjunction with an application for permit renewal, 180 days before expiration of the Permit, the Permittee shall submit a summary report of all meteorological data collected since issuance of the last Permit (minimum of 4 years of data). Said report shall compare the data observed against regional normal values, as available, and provide summary statistics of all meteorological data collected.

11. Containerized Waste Storage Area Reporting

The Permittee shall report the following events in accordance with the requirements of Part I.E.10:

a) Failure of sump pump or other equipment to provide removal of stormwater and free and uninterrupted drainage of the pad, and

b) Any container spill or leakage that may have caused a release to the subsurface soils or ground water via cracks or other damage to the asphalt surface.

12. Evaporation Ponds Reporting

a) Annual Water Quality Sampling –annual water quality samples collected and analyzed shall be reported in conjunction with the ground water quality monitoring report required by Part I.H.1 of this Permit.

b) 1995, 1997, 2000, Mixed Waste, and Northwest Corner Evaporation Pond Daily Monitoring – the Permittee shall report results of daily monitoring for the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds as follows:

1) BAT Failure Reporting – the Permittee shall report the following monitoring requirements pursuant to Part I.G.4.b:

a) Failure to maintain the 24-inch vertical freeboard requirement of Part I.E.14.a.4,

b) Failure of operational status for leak detection system pump, pump controller, head/pressure transducer, and/or flow meter equipment, pursuant to Part I.E.14.a.1,

c) Daily average leak detection pumpage volumes in excess of the volume monitoring thresholds established in Part I.F.14.b, or the BAT performance standards listed in Part I.E.14.a.2, and

d) Daily leak detection sump head values in excess of the BAT performance standards established pursuant to Part I.E.14.a.3.

2) Leak Detection System Pump Test Reporting – within 15 calendar days of completion of any leak detection system pump test required by Part I.F.13.b of this Permit, the Permittee shall submit a written report for Director approval to document equipment, methods, and results of said pump test.

c) Annual Pump Inspection – results of the annual pump inspection and bor-o-scope video inspection conducted in accordance with Part I.F.13.d shall be submitted for the Director's approval as part of the 1st Semi-annual BAT Monitoring Report.

13. Annual Ground Water Usage Report

On or before March 1 of each calendar year the Permittee shall survey and report the location of all ground water withdrawals within at least a 1-mile radius of the facility boundary. The purpose of this report will be to locate all points near the facility where ground water is pumped or otherwise removed for any consumptive use, including domestic, agricultural, or industrial purposes. This report shall include a survey of water right appropriations found in the area of interest, identify the owners thereof, and disclose the physical location and depths of all such ground water withdrawals.

14. Reserved

15. Mixed Waste Cell Leachate Reporting

The Permittee shall report the results of Mixed Waste Leachate water quality sampling and analysis required by Part I.F.15 of this Permit with the annual ground water monitoring reports required by Parts I.H.1 and I.H.3.

16. BAT Non-Compliance Reporting Requirements

For all facilities subject to requirements under the currently approved BAT Performance Monitoring Plan and BAT Contingency Plan (Appendix J and K, respectively) the Permittee shall provide verbal notification to the Director of any BAT failures that are not corrected within 24 hours. All such verbal notifications shall be followed-up with a written notification within 7 calendar days.

17. Annual Cover Test Cell Report

On or before March 1 of each calendar year the Permittee shall submit an annual report for Director approval. The annual report shall detail the Permittee's progress in implementing the corrective action plan required under Radioactive Material License Condition 28, provide the data collected in the past year, analyze the data, and interpret the meaning of the data relative to the overall objective of the corrective action plan.

18. Reserved

~~19.~~ Reserved ~~Railcar Rollover Facility Reporting~~

~~The Permittee shall submit the inspection results required in Part I.E.7c.2 with each Semi-annual BAT Monitoring Report. The annual inspection and repair activities required under Part I.E.17 shall be submitted with the First Semi-annual BAT Monitoring Report of each calendar year. The annual inspection report shall document all inspection and repair activities including photographs of the condition of the surfaces both before and after repairs.~~

20. BAT Semi-annual Monitoring Report

The Permittee shall submit a semi-annual BAT monitoring report to document compliance with the BAT performance standards mandated by Part I.E of this Permit. The report shall provide results, calculations, and evaluations of BAT monitoring data required in Part I.F of this Permit, including but not limited to the following:

a) 1995, 1997, 2000, Mixed Waste, and Northwest Corner Evaporation Ponds – the Semi-annual BAT monitoring report shall:

1) Include a quality assurance evaluation of all daily leak detection system flow volume and head data collected,

2) Include results of daily flow and head monitoring of the leak detection sump at each pond,

3) Include results of weekly calculation of daily average flow volumes from the leak detection sump at each pond, pursuant to Part I.F.13.a.3 of this Permit,

4) Evaluate any apparent trends in daily flow and head monitoring with respect to the pond's ability to comply with the BAT performance standards mandated by Part I.E.14 of this Permit.

b) Stormwater Management – the BAT Semi-annual report shall include daily stormwater monitoring records generated pursuant to Part I.F.24.

c) Reporting Schedule – the BAT Semi-annual Monitoring Report shall be submitted for Director approval in accordance with the following schedule:

Half	Report Due On
1st (January –June)	September 1
2nd (July-December)	March 1

*The Second Half Report shall include results of the required annual pressure tests for dual-walled pipe as identified in Part I.F.2.m.

21. Manifest Radioisotope Inventory Report

180 days prior to Permit expiration, the Permittee shall submit for Director approval a summary report of activities for radioisotopes including, but not limited to Aluminum-26, Berkelium-247, Calcium-41, Californium 250, Chlorine-36, Rhenium-187, Terbium-157, and Terbium-158; as listed in the current Radioactive Materials License (UT#2300249) Condition 29.E. Said report will be generated from the Clive facility Manifest Inventory (Permittee's EWIS database). The report shall provide a comprehensive, inclusive, and systematic evaluation of all manifest inventory data available for these radioisotopes disposed at the LARW, Class A West, 11e.(2), Mixed Waste, and any other embankment (excluding the Vitro Embankment) at the Clive facility. The report shall consist of a table of these and all other radioisotopes, which have been disposed at the Permittee's Clive facility to date, and will include, but is not limited to: (1) total of individual radioisotopes activity (mCi), (2) radioisotope half-life (years, days, minutes, etc.), (3) distributions coefficients for each radioisotope (L/kg), and (4) the current overall average activity concentration of each radioisotope, determined by dividing each isotope's total individual inventoried activity disposed by the mass of the current waste (pCi/.gm) found in all embankments listed at the facility.

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22. Comprehensive Ground Water Quality Evaluation Report

180 days prior to Permit expiration, the Permittee shall submit for Director approval a comprehensive ground water quality evaluation report for the site. In submittal of this report, the Permittee shall present a complete and thorough evaluation of all ground water and vadose zone water quality data available for

the LARW, Class A West, 11e.(2), and Mixed Waste facilities. Said report shall be similar to the September 1, 2004 Comprehensive Ground Water Quality Evaluation Report and shall include but not be limited to:

a) Graphs of temporal concentration trends for all compliance monitoring parameters and wells across the entire period of record, and an evaluation of parameter temporal relationships,

b) Number of water quality data available for each compliance parameter for each well,

c) Statistical tests of normality for each compliance parameter water quality data population, including univariate tests or equivalent,

d) Calculation of mean concentration and standard deviation on direct concentration values; for water quality parameter populations that fail the normality test, provide mean concentrations and standard deviations on transformed values that are normally distributed,

e) Calculation of mean concentration plus the second standard deviation for comparison with existing ground water protection levels to identify parameters that warrant an evaluation for ground water protection level adjustments based on natural variations in background concentrations, and

f) Isoconcentration maps of spatial concentration trends across Section 32 and an evaluation of facies and spatial relationships of water quality parameters that warrant an evaluation for ground water protection level adjustments based on section e) above.

23. Reserved

24. Revised Hydrogeologic Report

180 days prior to Permit expiration, the Permittee shall submit for Director approval a revised hydrogeologic report for the disposal facility and surrounding area. In submittal of this report the Permittee shall provide a comprehensive and thorough description of hydrogeologic conditions at the facility current through the time of report submittal. This report will include, but is not limited to an evaluation of:

a) Ground-water hydraulics, including ground-water flow directions, velocities, and hydraulic gradients, in both the horizontal and vertical directions, and will include equipotential maps, cross-sections, and related calculations, and

b) An updated evaluation and reinterpretation of the site hydrogeology using all available data including new or additional data acquired since Executive Secretary approval of the last revised hydrogeologic report dated September 1, 2004.

I. Compliance Schedule

1. Ground Water Institutional Control Plan

The Permittee shall submit a ground water institutional control plan for Director approval at the time the site Decontamination and Decommissioning Plan required under Radioactive Materials License Condition 74 is submitted. In submittal of this plan the Permittee shall eliminate future inadvertent intrusion into potentially contaminated ground water at the disposal facilities and subsequent routes of exposure to the public and the environment. Said plan shall include at least one of the options listed in the July 27, 1998 Utah Division of Radiation Control Request for Information.

2. Groundwater Mound Dewatering Near Wells GW-19A/GW-19B

On or before January 15, 2010, the Permittee will submit a plan and schedule for Director review and approval for long-term pumping of the shallow aquifer at or near monitoring well GW-19A. The purpose of this pumping is to eliminate any downward hydraulic gradient from the shallow to the intermediate aquifer at or near well GW-19A. If after review of the plan and schedule, the Director determines that additional information is required, the Permittee shall provide all requested information and resolve all issues identified within a timeframe agreed to by the Director and the Permittee. Within 60 days of Director approval of said plan and schedule, the Permittee shall implement the approved plan and schedule.

3. Background Ground Water Quality Report for the new Mixed Waste Compliance Wells.

The Permittee shall submit for Director approval four quarters of sampling, for all Mixed Waster parameters listed in Table 1E of this Permit, for new Mixed Waste embankment wells:

GW-151 GW-152 GW-153 GW-154

to evaluate which parameters, if any, require additional data so that it can be included in the Ground Water Protection Level Exceptions for Mixed Waste, Table 1F. This report shall include the wells and parameters needing additional evaluation. The Director does not anticipate the background concentrations for any parameter listed in Table 1E to be greater than their respective ground water protection levels. As a result, compliance monitoring for these parameters will commence in the new Mixed Waste Embankment wells with the Permittee's completion of the four quarters of sampling. With the completion of this quarterly sampling if any parameters in any well requires additional evaluation, with which to calculate background values for inclusion in the Mixed Waste Exceptions Table, Table 1E, a minimum of an additional four quarters of sampling will commence, to build a data population. The Permittee will than submit a background ground water quality report for the Mixed Waste embankment parameters and compliance monitoring well to be listed in Table 1E of this Permit .

This report shall include inter-well descriptive statistics for each Parameter, and well in question, such as:

a. Graphs of temporal concentration trends in each well for each monitoring constituent with an evaluation of seasonal and analytical variations,

b. Normality testing along with a discussion of those data points, if any, that are outliers and justification of why the outliers should or should not be removed from the population prior to performing statistical calculations,

c. Calculation of mean concentration and standard deviation for each constituent in each well, and

d. Calculation of mean concentration plus two (2) standard deviations for each constituent in each well.

After review and approval of this report, the Director may reopen this Permit and revise the ground water protection levels for the Mixed Waste embankment compliance wells. Compliance monitoring will continue in compliance monitoring wells GW-130, GW-131, and GW-132 until their abandonment.

4. Background Ground Water Quality Report for the new Class A West Compliance Wells.

The Permittee shall submit for Director approval four quarters of sampling, for all Class A West parameters listed in Table 1A of this Permit, for new Class A West embankment wells:

GW-142, GW-143, GW-144, GW-145, GW-146, GW-147, GW-148, GW149, and GW-150

to evaluate which parameters, if any, require additional data so that it can be included in the Ground Water Protection Level Exceptions for Class A West, Table 1B. This report shall include the four quarters of sampling data for all wells, and more detail on wells and parameters needing additional evaluation. The Director does not anticipate the concentrations of any parameter listed in Table 1A to be greater than their respective ground water protection levels. As a result, compliance monitoring for these parameters will commence in the new Class A West Embankment wells with the Permittee's completion of the four quarters of sampling. With the completion of this quarterly sampling if any parameters in any well requires additional evaluation, with which to calculate background values for inclusion in the Class A West Exceptions Table, Table 1B, a minimum of an additional four quarters of sampling will commence, to build a data population. The Permittee will than submit a background ground water quality report for the Class A West embankment parameters and compliance monitoring well to be listed in Table 1B of this Permit .

This report shall include inter-well descriptive statistics for each Parameter, and well in question, such as:

a. Graphs of temporal concentration trends in each well for each monitoring constituent with an evaluation of seasonal and analytical variations,

b. Normality testing along with a discussion of those data points, if any, that are outliers and justification of why the outliers should or should not be removed from the population prior to performing statistical calculations,

c. Calculation of mean concentration and standard deviation for each constituent in each well, and

d. Calculation of mean concentration plus two (2) standard deviations for each constituent in each well.

After review and approval of this report, the Director may reopen this Permit and revise the ground water protection levels for the Class A West embankment compliance wells. Compliance monitoring will continue in compliance monitoring wells GW-81, GW-82, GW-83, GW-84, GW-85, GW-86 until their abandonment, and in compliance monitoring wells GW-109, GW-110, GW-111, GW-112, GW-137, GW-138, GW-139, GW-140, and GW-141 until the new Class A West embankment wells are installed, and their abandonment.

PART II. MONITORING, RECORDING AND REPORTING REQUIREMENTS

A. Representative Sampling

Samples taken in compliance with the monitoring requirements established under Part I shall be representative of the monitored activity. Failure by the Permittee to conduct all ground water and pore water sampling in compliance with the currently approved Water Monitoring Quality Assurance Plan in Appendix B of this Permit shall be considered a failure to monitor and may subject the Permittee to enforcement action.

B. Analytical Procedures

Water sample analysis must be conducted according to test procedures specified under UAC R317-6-6.3(L), unless other test procedures have been specified in this Permit. All sample analysis shall be performed by laboratories certified by the State Health Laboratory, or otherwise after prior written approval by the Director.

C. Penalties for Tampering

The Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this Permit shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than six months per violation, or by both.

D. Reporting of Monitoring Results

Monitoring results obtained during each reporting period specified in the Permit, shall be submitted to the Director, at the following address:

Utah Department of Environmental Quality
Division of Radiation Control
195 North 1950 West
P.O. Box 144850
Salt Lake City, Utah 84114-4850
Attention: Ground Water Quality Program

E. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any Compliance Schedule of this Permit shall be submitted no later than 14 days following each schedule date.

F. Additional Monitoring by the Permittee

If the Permittee monitors any pollutant more frequently than required by this Permit, using approved test procedures as specified in this Permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted. Such increased frequency shall also be indicated.

G. Records Contents

Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements,
2. The individual(s) who performed the sampling or measurements,

3. The date(s) and time(s) analyses were performed,
4. The individual(s) who performed the analyses,
5. The analytical techniques or methods used, and
6. The results of such analyses.

H. Retention of Records

The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and copies of all reports required by this Permit, and records of all data used to complete the application for this Permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

I. Twenty-Four Hour Notice of Noncompliance Reporting

1. The Permittee shall verbally report any noncompliance which may endanger public health or the environment as soon as possible, but no later than 24 hours from the time the Permittee first became aware of the circumstances. The report shall be made to the Utah Department of Environmental Quality 24-hour number, (801) 536-4123, or to the Division of Water Quality, Ground Water Protection Section at (801) 538-6146, during normal business hours (8:00 am – 5:00 pm Mountain Time).
2. A written submission shall also be provided to the Director within 5 days of the time that the Permittee becomes aware of the circumstances. The written submission shall contain:
   a) A description of the noncompliance and its cause,
   b) The period of noncompliance, including exact dates and times,
   c) The estimated time noncompliance is expected to continue if it has not been corrected, and
   d) Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
3. Reports shall be submitted to the addresses in Part II.D, Reporting of Monitoring Results.

J. Other Noncompliance Reporting

Instances of noncompliance not required to be reported within 24 hours shall be reported at the time that monitoring reports for Part II.D are submitted.

K. Inspection and Entry

The Permittee shall allow the Director or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the Permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

4. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by the Act, any substances or parameters at any location.

L. Monitoring Well "As-Built" Reports

In the event that additional ground water monitoring wells are required by the Director, diagrams and description describing the final completion of the monitoring wells shall be submitted within 60 days of construction of each well. These reports will include:

1. Casing: depth, diameter, type of material, type of joints.
2. Screen: length, depth interval, diameter, material type, slot size.
3. Sand Pack: depth interval, material type and grain size.
4. Annular Seals: depth interval, material type.
5. Surface Casing(s) and Cap: depth, diameter, material type.
6. Survey Coordinates and Elevation: ground surface and elevation of water level measuring point in feet above mean sea level, measured to 0.01 of a foot. Said coordinates and elevation shall be conducted and certified by a Utah Licensed Land Surveyor.
7. Results of slug tests to determine local aquifer permeability in the vicinity of the well. Said tests shall conform with ASTM Method 4044-91. Test results and data analysis thereof shall be submitted for Director approval.

M. Plugging and Abandonment Reports

Within 30 days of completion of plugging and abandonment of any environmental measurement system or instrument, including but not limited to ground water monitoring wells, piezometers, soil tensiometers or moisture instrumentation, or any other stationary device to make environmental measurements, the Permittee shall submit an "As-Plugged" report for Director approval. Failure to comply with any condition of said approval shall constitute a violation of this Permit.

PART III. COMPLIANCE RESPONSIBILITIES

A. Duty to Comply

The Permittee must comply with all conditions of this Permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. The Permittee shall give advance notice to the Director of the Water Quality Board of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

B. Penalties for Violations of Permit Conditions

The Act provides that any person who violates a permit condition implementing provisions of the Act is subject to a civil penalty not to exceed $10,000 per day of such violation. Any person who willfully or negligently violates permit conditions is subject to a fine not exceeding $25,000 per day of violation. Any person convicted under Section 19-5-115(2) of the Act a second time shall be punished by a fine not exceeding $50,000 per day. Nothing in this Permit shall be construed to relieve the Permittee of the civil or criminal penalties for noncompliance.

C. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

D. Duty to Mitigate

The Permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this Permit which has a reasonable likelihood of adversely affecting human health or the environment.

E. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Failure to maintain all treatment and control systems in fully functional operating order or condition at the facility is a violation of this Permit. Proper operation and maintenance also includes adequate laboratory controls and quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of the Permit.

PART IV. GENERAL REQUIREMENTS

A. Prior Approval

Pursuant to UAC R317-6-6.1.A, the Permittee may not construct, install, or operate waste or wastewater storage, treatment, or disposal facilities, or any other facility that discharges or may discharge pollutants that may move directly or indirectly into ground water without a ground water discharge permit from the Director. Pursuant to UAC R317-6-6.3.J, the Permittee shall submit engineering plans, specifications, and plans for operation and maintenance of a proposed facility prior to Director approval.

B. Planned Changes

The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required when the alteration or addition could significantly change the nature of the facility or increase the quantity of pollutants discharged.

C. Modification of Approved Engineering Design, Specifications, or Construction

Any modification to the approved engineering design, specifications, or construction of the facility cited in this Permit shall require prior Director approval. Said facilities shall include, but are not limited to:

1. Waste and Wastewater Disposal and Containment Facilities – including all related engineering containment such as liner, cover, and drainage systems,
2. Waste and Wastewater Handling and Storage Facilities – used to handle, manage or store wastes prior to permanent disposal,
3. Decontamination Facilities – used to decontaminate equipment used in the transportation or disposal of waste, and
4. Environmental Monitoring Systems and Equipment – including ground water monitoring wells, piezometers, meteorological monitoring equipment, soil moisture and lysimeter instrumentation, or any other permanent system, mechanism, or instrument to make environmental measurements required by this Permit.

D. Anticipated Noncompliance

The Permittee shall give advance notice of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

E. Permit Actions

This Permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

F. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee must apply for and obtain a permit renewal or extension. The application should be submitted at least 180 days before the expiration date of this Permit.

G. Duty to Provide Information

The Permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit.

H. Other Information

When the Permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or any report to the Director, it shall promptly submit such facts or information.

I. Signatory Requirements

All applications, reports or information submitted to the Director shall be signed and certified.

1) All permit applications shall be signed as follows:

   a) For a corporation: by a responsible corporate officer.

   b) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively.

   c) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

2) All reports required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

   a) The authorization is made in writing by a person described above and submitted to the Director, and,

   b) The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)

3) Changes to Authorization. If an authorization under Part IV.I.2 is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Part IV.I.2 must submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

4) Certification. Any person signing a document under this section shall make the following certification: "I certify under penalty of law that this document and all

5) Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

J. Penalties for Falsification of Reports

The Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this Permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

K. Availability of Reports

Except for data determined to be confidential by the Permittee, all reports prepared in accordance with the terms of this Permit shall be available for public inspection at the offices of the Director. As required by the Act, permit applications, permits, effluent data, and ground water quality data shall not be considered confidential.

L. Property Rights

The issuance of this Permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

M. Severability

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

N. Transfers

This Permit may be automatically transferred to a new Permittee if:

1. The current Permittee notifies the Director at least 30 days in advance of the proposed transfer date;

2. The notice includes a written agreement between the existing and new Permittee containing a specific date for transfer of permit responsibility, coverage, and liability between them; and,The Director does not notify the existing Permittee and the proposed new Permittee of his or her intent to modify, or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement mentioned in paragraph 2 above.

O. State Laws

Nothing in this Permit shall be construed to preclude the institution of any legal action or relieve the Permittee from any responsibilities, liabilities, penalties established pursuant to any applicable state law or regulation under authority preserved by Section 19-5-117 of the Act.

P. Reopener Provision

This Permit may be reopened and modified, following proper administrative procedures, to include the appropriate limitations and compliance schedule, if necessary, if one or more of the following events occur:

1. If new ground water standards are adopted by the Board, the Permit may be reopened and modified to extend the terms of the Permit or to include pollutants covered by new standards. The Permittee may apply for a variance under the conditions outlined in R317-6.4(D)
2. Changes have been determined in background ground water quality.
3. Determination by the Director that changes are necessary in either the Permit or the facility to protect human health or the environment.

APPENDIX A:

Contingency Plan
for
Exceedances of Ground Water Protection Levels

SUBMITTED: August 5, 1991

APPROVED: September 24, 1991

RETITLED: June 30, 1999

APPENDIX B:

Water Monitoring Quality Assurance Plan

APPROVED: December 5, 1991

LATEST REVISION: August 30, 2011

APPENDIX C:

Construction Quality Assurance Plan
for
Collection Lysimeter Construction
and Operation, Maintenance, and Closure Plans
for
Collection Lysimeters and Related Approvals

SUBMITTED: September 16, 1992 and October 21, 1992, respectively
APPROVED: September 21, 1992 and November 27, 1992, respectively
REVISED: June 27, 2011

APPENDIX D:

Reserved

APPENDIX E:

Procedure
for
Certification of 11e.(2) Material

REVISED: March 1994

APPENDIX F:

Post-Closure Monitoring Plan for LARW and 11e.(2) Disposal Cells

APPROVED: September 13, 1994

REVISED: January 18, 2000

APPENDIX G:

Weather Station Monitoring Plan

APPROVED: September 14, 1994

REVISED: October 31, 2008

APPENDIX H:

Reserved

APPENDIX I:

Reserved

APPENDIX J:

Best Available Technology (BAT) Performance Monitoring Plan

LATEST REVISION: ~~June 13, 2013~~September 25, 2013

APPENDIX K:

Best Available Technology (BAT) Contingency Plan

LATEST REVISION: ~~June 13, 2013~~September 25, 2013

Permit No. UGW450005

APPENDIX J

Groundwater Quality Discharge Permit BAT Performance Monitoring Plan

Table of Contents

1 INTRODUCTION

Energy*Solutions*, LLC (Energy*Solutions)* has been granted a Groundwater Quality Discharge Permit, (GWQDP) Permit No. UGW450005 hereinafter called the Permit, by the State of Utah. The Permit specifies the construction, operation, and monitoring requirements for all Energy*Solutions* facilities that have a potential of discharging pollutants that may move directly or indirectly into groundwater. To cause the maximum reduction of pollutants achievable, the Permit specifies that "Best Available Technology" (BAT) be used in the construction of all facilities and that facilities be operated according to "Best Management Practices".

The Permit lists individual facilities that have BAT criteria associated with them. This BAT monitoring plan addresses the facilities and their BAT description and performance criteria (Table 1).

The Permit requires that Energy*Solutions* develop and follow a monitoring, inspection and maintenance plan for permitted facilities. BAT inspections are required to be performed daily for those BAT Compliance Monitoring Points noted on Form 1; weekly for those BAT Compliance Monitoring Points noted on Form 2; and monthly for those BAT Compliance Monitoring Points noted on Form 3. Additional, daily inspections for those BAT Compliance Monitoring Points noted on Form 1a are required after precipitation events of greater than 0.1 inch, until such time that all stormwater accumulation has been removed as required by Part I.E.7 of the Permit; and on Form 1b when managing PCB wastes at the shredder facility.

BAT inspections may be suspended at a facility that has been taken out of service for repairs, or due to lack of operational need to use the facility provided there has been no waste handling or washing/decontamination activity for 48 hours prior to the facility being taken out of service. A "out of service" facility must be secured and inaccessible in such a manner so as to minimize any potential threat to ground water while out of service. Any facility taken out of service is not permitted for waste storage or management and shall remain in a dry and secure condition, while out of service, wherein BAT inspections are no longer applicable. The DRC shall be provided at least 48 hour~~s~~ email notification previous to ~~of the intent to take~~ a facility being taken out of service. Upon request, ~~and provided~~ the DRC shall be provided an opportunity to inspect the facility after it has been taken out of service. The DRC will be notified by email, and ~~Additionally,~~ regularly schedule BAT inspections will resume on the day a facility returns to service~~and DRC will be notified by email when a facility returns to service~~.

If failure of BAT occurs at any facility, the BAT Contingency Plan located at Appendix K to the GWQDP shall be implemented.

2 DEFINITIONS

Access Pipe:
A pipe placed to provide access for the monitoring of leak detection system BAT performance criteria.

Allowable leakage rate:
Volume of fluid allowed to enter into leak detection systems through the upper flexible membrane liner of the evaporation ponds, averaged over a seven-day period. Volumes up to the allowable leakage rate do not constitute a failure of BAT.

Best Available Technology (BAT):
The application of design, equipment, work practice, operation standard or combination thereof, at a facility to effect the maximum reduction of a pollutant achievable by available processes and methods taking into account energy, public health, environmental and economic impacts and other costs.

BAT Compliance Monitoring Points:
Designated points of inspection, sampling, analysis, and monitoring to confirm compliance with the Permit.

Bor-o-scope:
Specialized equipment used to perform video inspection of the entire length of the drainage pipe of each collection lysimeter and inspection of other BAT piping as needed.

BAT Contingency Plan (Appendix K to the GWQDP):
Plan for regaining and maintaining compliance with Permit limits and for reestablishing compliance with best available technology. This plan will be implemented if any of the BAT Performance Criteria specified in this plan are not met.

Contact Stormwater:
Stormwater that has contacted waste, such as storm water within the Disposal Cells, ~~Rail Rollover Facility~~, Rotary Dump Facility, or Intermodal Unloading Facility (IUF).

Container Storage Compliance:
In accordance with Part I.E.10.a of the Permit, containers in storage at facilities other than the Class A West or 11e.(2) disposal cell shall be managed to prevent the contact of waste with the ground surface and meet the following criteria:

- Closed, strong tight container
- Labeled with generator, waste stream number, and date received
- Stored no more than 365 days before being taken to the disposal cell

Daily Inspection:
For purposes of this plan, daily inspections are required any day that waste or water management activities occur. The daily inspection is not required on weekends or holidays if water and waste management activities are not being conducted. Waste management activities include shipment receipt, unloading, waste placement, or decontamination facility operation. Daily inspection items are defined on Table 1 and Forms 1, 1a, and 1b.

Daily when stormwater is present inspection:
For the purpose of this plan inspected on days when there is storm water accumulation on site

Dry and Secure:

A facility will be dry and secure when all water has been removed from a facility, all water access to the facility is denied, and the facility is locked down and cannot be accessed/occupied without the consent of the Manger, Waste Disposal Operations.

Exposed Pad:
The surface of pad or concrete surface not covered with containers or process material.

Freeboard:
The vertical distance between the spillway elevation of fluid containment system and the water elevation.

Free Drainage:
The drainage of water from one designated area to another, including sloped surfaces and pipelines, in such a manner that water is not blocked or dammed by foreign material including sediment, debris, and other items not approved in the design and construction of a facility. Free drainage includes the movement of water aided by mechanical means such as sumps, pipelines, etc. Free drainage shall be maintained at all facilities as addressed in this plan.

Gravity Flow:
The free movement of water from a higher elevation to a lower elevation for water transfer to designated areas of the facility.

Head/pressure transducer:
An instrument used to detect, measure, and report the water level in a monitoring well or detection sump system.

Leak Detection System:
An engineered system designed to detect leaks in a low-permeability liner and capable of collecting and removing fluid present in the leak detection sump.

Leak Detection Sump:
A sump constructed between an upper and lower low-permeability liner that provides a collection point for detecting, measuring, and removing fluids that have leaked through the upper liner. When fluid is detected in the sump, it is an indication that the upper liner may be leaking.

Monthly Inspection:
Monthly BAT inspections as defined in Table 1 and Form 3 are required to be performed once per month, whether the facility is in operation or not.

Non-contact Stormwater:

Stormwater that has not contacted waste that is within the restricted area.

Pad Integrity:
The physical integrity of a pad structure including but not limited to: the presence of cracks, ruptures, damaged or porous areas, areas of subsidence or thinning.

Pump-back system:
An automatic system that provides for the removal of liquids from the leak detection system and reconveyance of the liquids to the associated evaporation pond.

Pump controller:
An instrument that controls the activation and deactivation of the submersible pump.

Pump-down test:
A test that determines the accuracy of the leak detection system.

Submersible pump:
A pump specially designed and engineered for being submersed in water.

Surface Integrity Discrepancy:
Includes the cleanliness of the pad and either: 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width), or 2) any significant deterioration or damage of the pad surface.

Transfer Sump:
A collection sump that is used to pump water from one point to another at the facility.

Weekly Inspection:
Weekly BAT inspections as defined in Table 1 and Form 2 are required to be performed once per week, whether the facility is in operation or not.

Weir:
A wall located in a settlement basin designed to control water flow to maximize sediment collection in the basin.

Weir Notch:
A notch located on a weir that allows water to flow from the settlement basin to an area in which water is collected for pumping.

3 RESPONSIBILITIES

The **Quality Assurance Manager (QAM)** or designee is responsible for performing surveillance and/or audit activities to verify implementation and compliance with the requirements of this plan and review of all designated forms as part of the quality assurance

review for accuracy and completeness. The QAM is also responsible for providing required verbal notifications to regulatory agencies and the Manager, Compliance and Permitting.

The **Manager, Waste Disposal Operations or designee** is responsible for maintaining assigned facilities in compliance with BAT requirements of the Clive site at all times. The Manager, Waste Disposal Operations (or designee) shall immediately notify the QAM when any BAT Failure occurs.

The **Radiation Safety Officer (RSO)** or designee is responsible for performing evaluations of any existing threat or potential threat to public health and the environment.

The **Facility Operator or BAT Inspector** performs the routine inspections and provides notification to the Manager, Waste Disposal Operations and Quality Assurance Manager, of any BAT non-compliance. The Facility Operator or BAT Inspector has the authority to initiate repairs when needed.

The **Site Hydrogeologist** or designee is responsible for performing collection lysimeter measurements and determining compliance.

The **Manager, Compliance and Permitting** or designee is responsible for determining sampling parameters for free liquid if present in the collection lysimeters, reviewing all groundwater sampling data, and reviewing video inspection of the lysimeters. The Manager, Compliance and Permitting is responsible for providing required written notification to the regulatory agencies.

The **Manager, Engineering and Maintenance** or designee is responsible for scheduling and oversight of pump down testing if required; and performing preventative maintenance on facility equipment in accordance to the manufacturer specifications and guidelines, and ensuring that spare sump pump and replacement parts (including batteries for portable measuring devices, etc.) are on site at all times for required repairs.

4 BAT PERFORMANCE MONITORING

Energy*Solutions* is responsible for implementing Best Available Technology, summarized in Table 1, BAT Monitoring and Performance Criteria Chart, to prevent discharge of fluids from the following facilities to subsurface soils or groundwater. Table 1 provides a description of BAT for each facility, inspection requirements and frequency, performance criteria, and where each inspection requirement is documented. Compliance with the performance standard(s) will be evaluated by performing and documenting inspections, performing equipment maintenance and repairs as required, and by implementing corrective actions.

4.1 1995, 1997, 2000, Northwest Corner, and Mixed Waste Evaporation Ponds

Each Evaporation Pond is equipped with a leak detection and pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

In accordance with Part I.E.16 of the Permit, BAT for Mixed Waste facilities other than the Mixed Waste Evaporation Pond is defined by requirements of the State-issued Part B Permit. Accordingly, the Mixed Waste Evaporation Pond inspection is required only on days that Mixed Waste Facility daily inspections are required under the State-issued Part B Permit.

4.2 1995/1997 Evaporation Pond Lift Station

The 1995/1997 Evaporation Pond Lift Station is designed and constructed to transfer wastewater from the IUF Lift Station and the Containerized Waste Storage Pad into either the 1995 Evaporation Pond or the 1997 Evaporation Pond.

4.3 2000 Evaporation Pond Transfer Pad

The 2000 Evaporation Pond Transfer Pad is designed and constructed with gravity flow to provide free drainage of water from the transfer pad to the collection

4.4 Northwest Corner Evaporation Pond Transfer Facility

The Northwest corner Evaporation Pond Transfer Facility was constructed and designed for trucks to collect and discharge water on a containment surface. The concrete pad slopes towards the pond and an HDPE apron/rub sheet attaches to the edge of the concrete pad. The rub sheet extends down the slope of the pond providing for water transfer over rub sheets thereby, reducing any negative effects on the pond liner.

~~*4.5 Rail Rollover Facility*~~

~~The Rail Rollover Facility is designed and constructed to aid in the unloading of waste from railcars. The BAT operation standard at the Rail Rollover Facility is to prevent stormwater from contacting waste. The Rail Rollover Facility is equipped with a concrete berm directing water flow to a concrete trough, a settling basin, and a collection sump. The berm has been constructed to channel surface flow of stormwater away from the rollover pit to a trough. Water free drains from the trough through the settling basin and into the sump. Water is transferred from the sump via double piping (pipe in pipe) to the manhole near the former Rail Wash Facility on Track 2, with further free drainage to the 1995 and 1997 Evaporation Ponds by way of the IUF Lift Station. The piping from the sump to the manhole is sloped so that if a leak should develop in the internal pipe, water will flow back to the sump in the external pipe.~~

~~The Rollover Facility is taken out of service and inspected annually during the second quarter, to ensure integrity of the asphalt ramps and the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.~~

~~4.6~~4.5 *Containerized Waste Storage Pad*

The Containerized Waste Storage Pad is designed and constructed with gravity flow to providing drainage of stormwater to the Pond Lift Station.

~~4.7~~4.6 *Intermodal Unloading Facility (IUF)*

The IUF is designed with gravity flow to the IUF Lift Station collection manhole. A sump pump is located within the manhole and pumps to a drain line to the 1995/1997 Pond Lift Station.

The IUF is inspected annually during the second quarter to ensure integrity of the concrete surfaces. The inspection may occur one bay at a time. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the affected bay. The results of the bay inspections are documented in an engineer's report. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.

~~4.8~~4.7 *Intermodal Unloading Facility Lift Station*

The IUF Lift Station is designed and constructed to collect wastewater from the Rail Wash Facility on Track No. 2, the IUF, and the Railcar Digging Facility~~, and the Rail Rollover Facility~~ for transfer via gravity flow to the 1995/1997 pond lift station. An alarm will activate when the water level within the lift station rises above the lowest level of the inlet pipe.

~~4.9~~4.8 *LARW Box-Washing Facility*

The LARW Box-Washing Facility is designed and constructed to provide free drainage of washwater from the wash pad to the floor sumps and through the wastewater drainage pipeline to the concrete holding tanks. The former drain line from the facility to the 1995/1997 pond lift station has been capped and the drain line abandoned. The cap placed over the outlet from the facility is inspected for integrity.

~~4.10~~4.9 Rail Wash Facility on Track No. 4

The Rail Wash Facility on Track No. 4 is designed and constructed to provide free drainage of washwater from the rail wash floor and concrete trench to the floor sumps and through the piping that discharges to the collection tank(s) of the adjacent equipment/mechanics building. The rail wash facility floor is inspected to ensure total containment of water and that there is no direct or indirect discharge to subsurface soils or groundwater. The facility also includes an adjacent equipment/mechanics building that contains the collection tank(s) for the washing operations.

~~4.11~~4.10 Rail Digging Facility

The Rail Digging Facility located between Track No. 3 and Track No. 4 is designed and constructed to provide free drainage of stormwater from the asphalt containment pad and ramps to three concrete collection basins, for a total of 4 sumps requiring inspection. Water from the collection basin drains to a settling basin. Water continues to drain through piping to the digging facility manhole, continuing on to the IUF Lift Station. The Rail Digging Facility is designed for digging waste from rail cars and transferring it to hauling equipment. No waste storage will occur.

~~4.12~~4.11 East Truck Unloading Area

The East Truck Unloading Area includes the Container Holding Pads, Unloading Dock with Ramp and Unloading Area asphalt surfaces. The facility is designed with gravity flow to direct stormwater accumulated on the asphalt surfaces away from the concrete container holding pads. The concrete container holding pads are designed with gravity flow to direct water that accumulates on the concrete surface to collection troughs.

Overnight storage is prohibited at the dock and on asphalt surfaces within the facility. Storage and sampling are restricted to the concrete holding pads. Containers may be placed temporarily on the asphalt surface to facilitate transfer. Temporary is defined as the current acceptance date on the Bates Label. Therefore, this prohibits overnight storage.

~~4.13~~4.12 Decontamination Access Control Building

The Decontamination Access Control Building is designed and constructed to provide personnel access to the Restricted Area. The design provides for free drainage from the facility to the wastewater collection tank buried outside the southwest corner of the building.

~~4.14~~4.13 Intermodal Container Wash Building

The Intermodal Container Wash Building is used for the decontamination of containers. It was designed with a leak detection system and constructed in order to provide for the free drainage of washwater from the bootwash, and washbays to the sediment basin.

~~4.15~~4.14 *Shredder Facility*

The Shredder Facility is used to size-reduce debris wastes prior to disposal. It is designed to provide free drainage to seven catchbasins, which then drain to the sump in the Rotary Dump Facility before being pumped to the Northwest Corner Evaporation Pond. Because the seven catchbasins are located at least 3.5 feet lower in elevation than the top of Manhole 1, used to pump water to the tanks, inspecting each catchbasin also functions as an inspection for functionality of the submersible pump in Manhole 1. When PCB-Containing waste is stored on the Shredder Pad, additional inspection criteria will be followed in accordance with the TSCA Approval for Shredding Polychlorinated Biphenyl (PCB) Wastes.

An alternate wastewater management system provides for the removal of water from manhole 1 via the use of a submersible pump and pipeline to water storage tanks located on the concrete pad. This system will be used during the shredding of PCB waste and optionally when the drainage system to the Rotary Dump Facility or Northwest Corner Evaporation Pond is out of service. When in use, the alternate wastewater management system and associated valves will be inspected to ensure that the associated valves are in the proper position, the pipeline is not leaking, and the high water level alarms are not activated.

The Shredder Facility is taken out of service and inspected annually during the second quarter, to ensure integrity of the concrete surfaces and to ensure that system valves are operating as designed. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report. Additional reporting may be required in accordance with the TSCA Approval for Shredding Polychlorinated Biphenyl (PCB) Wastes.

~~4.16~~4.15 *Rotary Dump Facility*

The Rotary Dump Facility is designed and constructed for the thawing, emptying, and washing of railcars. It includes 4 sub-facilities. The Rotary Dump Facility is taken out of service and all areas are inspected annually during the second quarter, to ensure integrity of the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the next Semi-annual BAT Monitoring Report.

~~4.16.1~~4.15.1 **Thaw Building**

The railcars enter the Thaw Building where wall and floor heaters provide heat as necessary to thaw the material for dumping. The rail in the thaw building is underlain with a flexible membrane liner covered with a granular surface. If any liquid is generated, the liquid drains into the granular surface, and is captured by the flexible membrane liner. The liquid then gravity

drains via perforated pipe installed above the flexible membrane liner to a collection pipe. The collection pipe located under the granular surface is covered with geotextile material to prevent intrusion from material that may block the pipe. The wastewater free drains via a four-inch PVC pipe that discharges to the west side of the Rotary Building floor. The pipe from the Thaw Building is located one foot off of the Rotary Building floor.

~~4.16.2~~4.15.2 Rotary Building

The Rotary Building is designed for the dumping of waste from railcars onto the Rotary Building Floor. While dumping is in process, water cannons may be used to remove excess material from the railcar. The Rotary Building floor is sloped for free drainage of wastewater to the sediment basin. Wastewater within the sediment basin is pumped via the use of a submersible pump and pipeline to the Northwest Corner Evaporation Pond or wastewater storage tanks at the Alternate Wastewater Management Area. Routing of wastewater at the facility is controlled by locking valves. When the valve in the pipeline to the pond is in the "Closed" position and the valve in the pipeline to the tanks is in the "Open" position, the wastewater is transferred to the Alternate Wastewater Management Area. Notification to the Director is required. When the locking valve in the pipeline to the tanks is in the Closed" position and the valve in the pipeline to the pond is in the "Open" position, the wastewater is pumped to the Northwest Corner Evaporation Pond. The pipeline to the Northwest Corner Evaporation Pond is dual walled from the point where it exits the building to the discharge point in the pond.

~~4.16.3~~4.15.3 Wash Building

The Wash Building is designed for the decontamination of railcars. Non-contaminated water is provided via four 2,500 gallon water storage tanks. Water used in the decontamination process gravity drains via two trenches to a drain pipe. Water from the drain pipe gravity drains to the sediment tank located on the floor of the rotary dump building. The sediment tank is designed with an overflow that drains from the sediment tank onto the Rotary Building floor surface to the sediment basin. Water within the sediment tank supplies the water cannons within the Rotary Building.

~~4.16.4~~4.15.4 Alternate Wastewater Management Area

The wastewater from the sediment basin is transferred via submersible pump and pipeline to two wastewater storage tanks or to the Northwest Corner Evaporation Pond. A locking valve in the pipeline to the Alternate Wastewater Management Area (tanks) is opened and a locking valve in the pipeline to the pond is closed when the tanks are placed in service. Notification to the Director is provided when the Alternate Wastewater Management Area is placed in service. Each tank is equipped with a float switch that triggers activation of a visual alarm when the water level reaches two feet from the top of the tank. The pipeline transfers wastewater to both tanks. Reuse of the wastewater from these storage tanks at the wash building is prohibited. The tanks are located on a concrete surface.

~~4.17~~4.16 *East Side Drainage System*

The East Side Drainage System is comprised of two separate drainage systems; one for wastewater from decontamination facilities, and one for stormwater. A process flow diagram of the system is provided as Figure 1.

The wastewater system is designed as follows: wastewater is pumped from the Decontamination Access Control Building, the Intermodal Container Wash Building, and the Rail Wash Facility on Track No. 4 within a dual walled pipe system to the 1997 Pond.

The Decontamination Access Control Building Tank, Intermodal Container Wash Building, and the Rail Wash Facility on Track No. 4 are each equipped with shut-off (isolation) valves. These valves when closed will isolate the respective facilities thereby preventing the flow of additional wastewater via the pipelines to the 1997 Pond. This allows for the isolation of facilities and, upon notification to the DRC, manual removal of wastewater for continued operation if a BAT failure or maintenance outage exists at another facility connected to the drainage system or during scheduled maintenance or inspection of the drainage system.

~~4.17.1~~4.16.1 Decontamination Access Control Building Wastewater Flow and Monitoring

Wastewater from the Decontamination Access Control Building drains to a double-walled collection tank outside of the building. A moisture leak detection sensor is located between the walls (annular) of the tank to detect moisture or leakage from the primary wall of the tank. A strobe alarm is located on the outside of the building adjacent to the tank that is activated by the sensor in the tank annular space. A second leak detection sensor is located within the containment pipe to detect a leak in the carrier pipe, which also activates the strobe alarm mounted on the outside of the building adjacent to the tank. A high water level float alarm set so as to maintain the water level in the tank below the level of the inlet pipe activates strobe alarms located inside the building above the boot wash and the respirator wash sink. An isolation valve (P1-V01) is located at the collection tank of the Decontamination Access Control Building. This isolation valve when closed will prevent additional wastewater from transfer to the Rail Wash Facility on Track No. 4.

~~4.17.2~~4.16.2 Rail Wash Facility on Track No. 4 Wastewater Flow and Monitoring

Wastewater is pumped from the collection tank at the Decontamination Access Control Building to the Rail Wash Facility on Track No. 4 through a dual wall pipe designated as Pipeline No.1. The inside pipe of the dual wall system is designated as the carrier pipe and the outer pipe is designated as the containment pipe. Pipeline No. 1 discharges into the wash water collection tank at the Rail Wash Facility on Track No. 4. Wastewater from the Rail Wash Facility on Track No. 4 collection tank is pumped through a dual wall pipe (Pipeline No. 2) to Manhole No. 1. An isolation valve (P2-V01), is located at the collection tank at the Rail Wash Facility on Track No. 4. This isolation valve when closed will prevent additional wastewater transfer via Pipeline No. 2 to Manhole 1.

~~4.17.3~~4.16.3 Intermodal Container Wash Building Wastewater Flow and Monitoring

Wastewater from the Intermodal Container Wash Building sump is pumped to Manhole No. 1 through a dual wall pipeline designated pipeline No. 3 where it connects (via manifold) with Pipeline No. 4. An isolation valve (P3-V01) is located at the sedimentation sump in the Intermodal Container Wash Building. This isolation valve will prevent additional wastewater from transfer via Pipeline No. 3 to Manhole No. 1 when closed.

~~4.17.4~~4.16.4 Manhole No. 1 Wastewater Flow and Monitoring

Manhole No. 1 is a dry manhole (receives no storm or wastewater) that provides access to a manifold system connecting pipelines No. 2, 3, and 4. Manhole No. 1 is located in close proximity to the Rail Wash Facility on Track No. 2 near the SW corner of the building. Within Manhole 1, dual wall pipelines No. 2 and No. 3 are joined with a manifold and exit the manhole as dual wall Pipeline No. 4. routed to the 1997 Pond. Check valves prevent water from backflowing into Pipelines No. 2 and No. 3. Wastewater flows from Manhole No. 1 to Manhole No. 2 via Pipeline No. 4 then to the 1997 Pond via the dual wall pipe designated as Pipeline No. 4a. A leak detection sensor and drip leg (2 total) is installed in each containment pipe of Pipelines No. 2 and No. 3 at Manhole No. 1 to detect leakage from the carrier pipes. The sensors activate a strobe alarm mounted to the exterior of the adjacent Track 4 Rail Wash Building. In addition, a sight canister is installed on each drip leg to collect any water, for visual detection, that may flow from the drip leg.

~~4.17.5~~4.16.5 Manhole No. 2 Wastewater Flow and Monitoring

Pipeline 4 carries wastewater to Manhole 2 located north of the 1997 Pond. Pipeline 5 carries stormwater from the stormwater collection/transfer sump to Manhole No. 2. Pipelines No. 4a and No. 5a carry wastewater and stormwater from Manhole 2 to the 1997 Pond. The carrier pipelines pass through Manhole 2, keeping Manhole 2 dry and the water streams separate. A leak detection sensor and drip leg (4 total) is installed in each containment pipe of Pipelines No. 4, No. 4a, No. 5 and No. 5a at Manhole No. 2 to detect leakage from the carrier pipes. The sensors activate a strobe alarm mounted on a post adjacent to Manhole 2. In addition, a sight canister is installed on each drip leg to collect any water, for visual detection, that may flow from the drip leg.

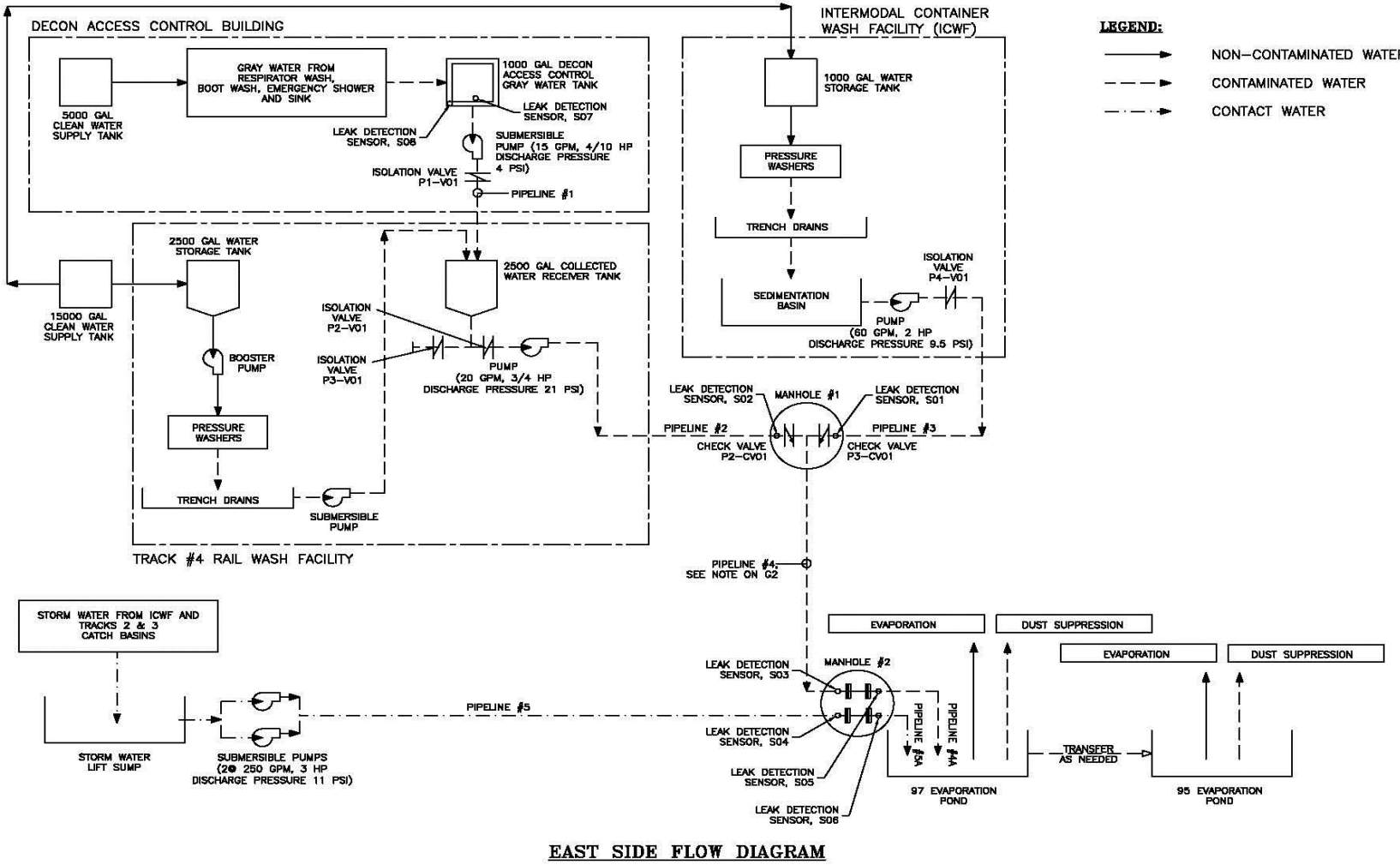
~~4.17.6~~4.16.6 Stormwater Lift Sump Flow and Monitoring

Stormwater is collected by the catchbasins located south of the Intermodal Container Wash Building, north and south of theIUF, and between Tracks 2 and 3 and routed to the stormwater lift sump. The collected water is pumped from the sump and routed to the 1997 Pond through Pipeline No. 5.

A high water level float alarm is installed in the stormwater lift sump to indicate high water conditions within the sump due to system failure. The alarm activates a strobe alarm mounted to a post adjacent to the sump. If the high water level alarm is activated at the stormwater lift sump, ponding will occur at the catchbasins before water will overtop the stormwater lift sump. The alarm is inspected during the second week of each month.

~~4.17.7~~4.16.7 Annual Pipe Pressure Testing

All carrier pipes (Pipelines No. 1, No. 2, No. 3, No. 4, No. 4a, No. 5 and No. 5a) within the East Side Drainage System will be pressure tested annually during the third quarter of the calendar year to ensure integrity. The Time-Pressure Drop method described in ASTM F1417 shall be used to determine the test criteria. In addition, the leak detection probes (8 total) will also be inspected and tested annually at the same time as the pipe pressure testing. The testing shall be conducted under the direction of a certified Professional Engineer qualified to perform pipe integrity testing. Notification of shut down of the system for testing purposes will be provided at least 48 hours prior to the Director. A written report including test results will be maintained in the operating record.



EAST SIDE FLOW DIAGRAM

FIGURE 1 – EAST SIDE FLOW DIAGRAM

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~~4.18~~4.17 *South Ditch*

The Vitro drainage ditch culvert replacement (hereafter referred to as the South Ditch) was constructed to reduce a potential source of groundwater mounding near well GW-60. Since the ditch does not entirely free drain, the ditch contains a sump to lift remaining water from the ditch to the Southwest Corner Pond. The Southwest Corner Pond is a non-contact water collection and storage pond outside the restricted area and is not subject to the Ground Water Quality Discharge Permit. The pump may be removed from the sump during freezing weather. When the pump is removed, manual water removal will begin within the same working day after water is discovered to be above the sump grate.

~~4.19~~4.18 *LLRW Operations Building*

Wastewater from the restricted area of the LLRW Operations Building drains to a 2,500 gallon double-walled collection tank outside of the building. A moisture leak detection sensor is located at the bottom of the tank between the walls (annular space) of the tank to detect moisture or leakage from the primary wall of the tank. A strobe alarm located adjacent to the tank is activated by the sensor in the tank annular space. A high level float alarm (orange strobe) is set to indicate when the tank is three-quarters full (approximately 625 gallons remaining capacity). A high-high-level float alarm (red strobe) is set just below the maximum capacity of the tank (approximately 125 gallons remaining capacity). The bootwash and sample prep room floor drains are the lowest elevation floor drains in the building, and therefore will provide the earliest indication if the tank is overfilled.

~~4.20~~4.19 *SRS DU Storage Building*

The SRS DU Storage Building is designed to protect SRS DU waste from the elements. The storage building is a steel building on concrete foundation with an asphalt floor.

~~4.21~~4.20 *Evaporation Pond Ancillary Equipment to Facilitate Evaporation*

Ancillary equipment intended to facilitate evaporation at all Evaporation Ponds will be constructed of UV resistant, PVC piping that is set a minimum of 2 feet from the top of berm. The inlet pipe is located over a rub sheet to protect the liner. Water is conveyed to the piping and fed back into the pond.

24 hours prior to use of ancillary equipment at an approved evaporation pond, verbal or email notification will be provided to DRC in order to provide opportunity for inspection.

Any proposed change in a test design or construction of ancillary equipment at an evaporation pond must adhere to the following BAT principles:

- Equipment that conveys contact wastewater (such as pumps, pipe, hoses, etc.) and is not located directly on the pond liner shall be placed inside a watertight secondary containment system that drains into the pond.
- Equipment that is placed onto or over the pond liner shall be placed so that the integrity of the pond liner is protected; i.e., placed on rub sheets or otherwise arranged to minimize the potential for the pond liner to be damaged.
- Spillage of contact wastewater outside of the pond or secondary containment or damage to the pond liner shall be responded to in accordance with the BAT Contingency Plan.

~~4.22~~4.21 *Stormwater Management*

The Clive facility is inspected daily for the accumulation of stormwater. Water management personnel collect and transfer stormwater from within the restricted area to the evaporation ponds. Collected stormwater and water contained within the evaporation ponds may also be used for minimal engineering and dust control purposes at the Class A West embankment and for dust suppression activities at the Shredder Facility. The management of stormwater at the facility shall occur according to the following requirements:

Stormwater runoff at the Class A West, and 11e.(2) Disposal Cells which has contacted the waste (i.e. contact stormwater), shall be contained. The priority schedule listed below shall be followed for removal of stormwater that falls inside the restricted area. This includes runoff from waste disposed in excavated, below grade areas of the Disposal Cells.

Within 24 hours of discovery of any accumulation of contact stormwater, removal of said wastewater shall commence. Wastewater removal shall occur in accordance with the priority list below.

1) Contact stormwater inside the footprint of the Class AWest, and 11e.(2) Disposal Cells
2) Contact stormwater at the ~~Rail Rollover and~~ Rotary Dump Facility
3) Contact stormwater at the IUF
4) Contact wastewater at any facility (e.g. BAT Failures, facility maintenance, etc.)
5) Non-contact stormwater within the restricted area

If water removal equipment is not effective for use at higher priority water accumulation areas, said equipment may be used at the next lower priority location where it will be effective provided that higher priority collection is not interrupted. This is defined as a bypass of priority collection (e.g., if water removal equipment cannot navigate the terrain in the embankments, it can be used to remove water from a priority two location, if necessary; or if a pump is not usable to transfer water at a priority one location and cannot be used at a priority two location, it can be used at the priority three location, or the next lower priority, where it will be effective).

If conditions improve so that water removal equipment can now access or be used at the previous higher priority inaccessible area, the water removal equipment will return to the high priority area immediately.

Within 24 hours the Manager, Compliance and Permitting or designee shall provide notification and justification to the Director whenever equipment bypasses a higher priority for use at a lower priority location.

Approval must be obtained from the Director to interrupt (stop) collection from a higher priority location for the purpose of collecting water from a lower priority location.

If stormwater removal at a lower priority location interrupts listed higher priority collection without required approvals, contingency actions shall be performed in accordance with the BAT Contingency Plan.

5 QUALITY ASSURANCE/QUALITY CONTROL

The Quality Assurance Manager or designee will conduct surveillance activities to ensure the requirements of the BAT Performance Monitoring Plan have been implemented, as required. Surveillance activities will be performed in accordance with the currently approved Quality Assurance Program Document. The Quality Assurance Manager or designee will also review inspection forms for accuracy and completeness.

The Manager, Waste Disposal Operations or designee will conduct a monthly assessment of the daily and weekly inspections to ensure inspection activities are performed in accordance with this plan. Assessments will be conducted in accordance with currently approved procedures in accordance with ES-QA-PR-002, Quality Assurance Surveillances. The applicable site director or designee will also perform reviews of inspection forms for accuracy and completeness.

ENERGYSOLUTIONS

TABLE 1

BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
1995, 1997, 2000, Northwest Corner, and Mixed Waste Evaporation Ponds	Freeboard between pond water level and spillway elevation, measured vertically	Daily – visual inspection	Minimum of 24 inches of freeboard.	Form 1 (Form 4 for MW Pond)
	Leak detection system and monitoring equipment including: leak detection system pump, head pressure transducer, and flow meters	Daily – Record water flow meter reading. Daily – Record fluid head reading from pressure transducer. Weekly – Calculate seven-day average flow rate.	Pressure transducer ≤ 1.0 foot. Flow rate initial action levels for each evaporation Pond: 1995 Pond – 155 gal/day 1997 Pond – 160 gal/day 2000 Pond – 355 gal/day NW Pond – 300 gal/day MW Pond – 160 gal/day	Form 1(Form 4 for MW Pond) Form 2
	Leak detection system pump	Annual – inspection and maintenance.	Procedure CL-EN-PR-023, *Annual Evaporation Pond Pump Inspection*	Procedure CL-EN-PR-023, form CL-EN-PR-023 F1
	Pump functionality and return pipe integrity	Monthly – inspect piping from leak detection system to pond through the manual removal of water.	Pump operational; no leakage from piping	Form 3
1995/1997 Evaporation Pond Lift Station	Water level within the lift station	Daily – Inspect for visual alarm activation. Monthly – Confirm alarm function	Water level not to exceed the lowest level of the inlet pipe (set point for alarm) Alarm trips manually	Form 1 Form 3

TABLE 1
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
2000 Evaporation Pond Water Transfer Pad	Gravity flow from the pad to the collection sump.	Daily when stormwater present – free drainage; sump water level Weekly – Surface integrity	Free drainage; water below grate of sump See definition "Surface Integrity Discrepancy"	Form 1a Form 2
Northwest Corner Evaporation Pond Transfer Facility	Concrete pad with HDPE apron for water transfer and collection.	Monthly – Surface integrity; inspect pad apron for signs of cracks, tears, or holes	No holes, cracks, or tears at the seam between the concrete apron and HDPE liner. See definition "Surface IntegrityDiscrepancy"	Form 3
~~Rail Rollover Facility~~	~~Minimize stormwater contact with waste~~	~~Daily- free drainage;~~ ~~Daily when stormwater present – free drainage; sump water level; sump pump;~~ ~~Weekly – Surface integrity, sump pump;~~ ~~Annual – Clean entire surface for detailed surface integrity inspection~~	~~Free drainage; no ponding of water within covered area; water below grate of sump; sump pump operational; repair of concrete and asphalt surfaces~~ ~~See definitions "Free Drainage", and"Surface Integrity Discrepancy"~~	~~Form 1~~ ~~Form 1a~~ ~~Form 2~~ ~~Engineer's report of annual inspection~~

TABLE 1
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Containerized Waste Storage Pad	Minimize stormwater from contacting waste	Daily when stormwater present – free drainage; sump water level; cleanliness of pad surface Weekly – Surface integrity; container storage compliance cleanliness of pad surface	Free drainage; water below grate of sump See definitions "Surface Integrity Discrepancy" and "Container Storage Compliance"	Form 1a Form 2
Intermodal Unloading Facility (IUF)	Minimize stormwater contact with waste	Daily - free draining conditions for unloading pad and stormwater drainage pipeline system. Daily when stormwater present – free drainage; sump water level, and cleanliness of pad surface Weekly – Surface integrity; container storage compliance, and cleanliness of pad surface Annual – Clean entire surface for detailed surface integrity inspection (see section 4.7)	Free drainage; water below grate of sump See definitions "Surface Integrity Discrepancy" and "Container Storage Compliance"	Form 1 Form 1a Form 2 Engineer's report of annual inspection
IUF Lift Station	Contain contact water within facility	Daily – Inspect for visual alarm activation. Monthly – Alarm function	Water level not to exceed the lowest level of the inlet pipe (set point for alarm) Alarm trips manually	Form 1 Form 3

TABLE 1
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
LARW Box Washing Facility	Contain contact water within facility	Daily-Sump water level; free drainage; holding tank water level. Weekly – surface integrity; pipeline cap;	Sump water level below grate; free drainage; tank water level ≤ ¾ full; see definition "Surface Integrity Discrepancy"; pipeline cap intact;	Form 1 Form 2
Rail Wash Facility on Track No. 4	Contain contact water within facility	Daily-Sump water level; free drainage (including concrete trench); and water level in collection and storage tanks. Weekly – surface integrity, sump pump operational; inspection of collection and storage tanks. Monthly – Alarm function	Sump water level below grate; free drainage; see definition "Surface Integrity Discrepancy" Alarm trips manually	Form 1 Form 2 Form 3
Rail Digging Facility	Minimize stormwater contact with waste	Daily- cleanliness of asphalt and concrete surface. Daily when stormwater present – free drainage; sump water level. Weekly – Surface integrity	Free drainage; water below grate of sump (4) See definition "Surface Integrity Discrepancy"	Form 1 Form 1a Form 2

TABLE 1

BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
East Truck Unloading Area and Container Holding Pads	Minimize stormwater contacting waste	Daily when stormwater present – free drainage; collection trough water level Weekly – Surface integrity; container storage compliance	Free drainage; water level ≤ ¾ full See definitions "Surface Integrity Discrepancy" and "Container Storage Compliance"	Form 1a Form 2
Decontamination Access Control Building	Contain contact water within facility	Weekly – Free drainage to the wastewater collection tank; level of wastewater in the tank; leak detection system check Monthly – Alarm function	Free drainage; water level not to exceed the lowest level of the inlet pipe (set point for alarm); no fluid in drip leg 7 Alarm trips manually	Form 2 Form 3
Intermodal Container Wash Building	Contain contact water within facility	Daily-Sediment basin water level; free drainage; Weekly – surface integrity; leak detection system	Sump water level below grate; free drainage from bootwashes to troughs, from washbays to troughs through to the sediment basin; see definition "Surface Integrity Discrepancy"; no fluids in leak detection system	Form 1 Form 2

TABLE 1
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Shredder Facility	Minimize stormwater contact with waste	Daily- free drainage. Daily when stormwater present – free drainage; sump water level; water level of catchbasins Weekly – surface integrity Annual – Clean entire surface for detailed surface integrity inspection	Free drainage to catchbasins; water below grate of sump (7) Shredded material removed from the outfeed pad by the end of shift. See definition "Surface Integrity Discrepancy"	Form 1 Form 1a Form 2 Engineer's report of annual inspection
Shredder Facility Alternate Wastewater Management System	Minimize stormwater contact with waste	Daily when in use – free drainage; pipeline integrity; high water level alarm; surface integrity Monthly – Alarm function	Free drainage; water below grate of sump (7); pipeline not leaking; high level alarm off; see definition "Surface Integrity Discrepancy" Alarm trips manually	Form 1b Form 3
Rotary Dump Facility – Thaw Building	Minimize stormwater contact with waste and contain contact water within all facilities. Consists of the Thaw, Rotary, and Wash buildings. Contain contact water within facility	Weekly – free drainage (within Thaw Building and at discharge pipe); surface integrity	Free drainage; discharge pipe not blocked; see definition "Surface Integrity	Form 2

TABLE 1
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rotary Dump Facility – Rotary Building	Contain contact water within facility	Daily– free drainage; sediment basin water level Weekly – surface integrity; leak detection system Annual – Clean entire surface for detailed surface integrity inspection (includes Thaw Building and Wash Building concrete surfaces)	Free drainage; water below grate of sediment basin See definition "Surface Integrity Discrepancy"; no fluids in leak detection system	Form 1 Form 2 Engineer's report of annual inspection
Rotary Dump Facility – Wash Building	Contain contact water within facility	Daily-free drainage; water in trenches below grates. Weekly – surface integrity (including east curb and seals around stairway footing)	Free drainage; see definition "Surface Integrity	Form 1 Form 2
Rotary Dump Facility – Alternate Wastewater Management Area	Contain contact water within facility	When in use, Daily inspection for leakage in the pipeline from sediment basin to wastewater storage tanks; activation of visual alarms at wastewater storage tanks Weekly – free drainage; pipeline integrity; high water level alarm; surface integrity Monthly – Alarm function	Free drainage;; pipeline not leaking; high level alarm off; see definition "Surface Integrity Discrepancy" Alarm trips manually	Form 1 Form 2 Form 3

TABLE 1
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
East Side Drainage System	Contain contact water within system	Daily – Manhole 1, 2, and stormwater lift station alarms Weekly – Monthly – Leak detection system check ; Alarm function Annual – Pressure test	Alarms off No fluid in drip legs 1-2 (manhole 1) or 3-6 (manhole 2) Alarm trips manually See section 4.17.7	Form 1 Form 3 Engineer's report of annual inspection
South Ditch	Reduce a potential source of groundwater recharge via timely transfer of water to Southwest Corner Pond	Daily when stormwater present – pump operating Monthly – Alarm function	Pump operates while water in sump or manual removal Alarm trips manually	Form 1a Form 3
LLRW Operations Building	Contain contact water within facility	Daily – Alarm status Monthly – Free drainage to the wastewater collection tank; Annual - Alarm function	Alarms off Bootwash and sample prep room floor drains free drain Alarm trips manually	Form 1 Form 3Engineer's report of annual inspection
SRS DU Storage Building	Prevent stormwater from contacting waste	Daily when stormwater present – Surface integrity; container storage compliance; check for presence of water. Monthly – Surface intergrity; container storage compliance, check for presence of water	See definitions "Surface Integrity Discrepancy" and "Container Storage Compliance"; remove any water observed	Form 1a Form 3

TABLE 1

BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Evaporation Pond Ancillary Equipment to Facilitate Evaporation	Contain contact water within the pond	Daily – pond liner integrity; system containment	Maintenance of pond liner integrity and prevention of spillage outside of pond or secondary containment.	Form 1

APPENDIX K

Groundwater Quality Discharge Permit
BAT Contingency Plan

1 INTRODUCTION

Energy*Solutions*, LLC (Energy*Solutions*) has been granted a Groundwater Quality Discharge Permit, (GWQDP) Permit No. UGW450005 hereinafter called the Permit by the State of Utah. The Permit specifies the construction, operation, and monitoring requirements for all facilities at the Clive site that have a potential of discharging pollutants that may move directly or indirectly into groundwater. To cause the maximum reduction of pollutants achievable, the Permit specifies that "Best Available Technology" (BAT) be used in the construction of all facilities and that facilities be operated according to "Best Management Practices". To demonstrate compliance with BAT requirements and performance standards, Energy*Solutions* shall implement a BAT Performance Monitoring Plan in accordance with the Permit. In the event of a BAT failure at any facility, the following Contingency Plan will be implemented.

This Contingency Plan provides direction to Energy*Solutions* personnel as to contingency actions required for maintaining or regaining compliance with the GWQDP BAT requirements. The timely execution of contingency and corrective actions outlined in this Contingency Plan will provide Energy*Solutions* with the basis to exercise the Affirmative Defense provision in the Permit and thereby avoid noncompliance status and potential enforcement action.

2 DEFINITIONS

Contingency Action:
Actions performed to eliminate an existing threat or potential threat to human health and/or the environment and regain compliance with BAT as defined in the Permit.

Corrective Action:
Actions required for regaining or maintaining compliance with all licenses and permits.

Discharge:
The release of a pollutant directly or indirectly into subsurface waters of the state.

Best Available Technology:
The application of design, equipment, work practice, operation standard, or combination thereof, at a facility to effect the maximum reduction of a pollutant achievable by available processes and methods taking into account energy, public health, environmental and economic impacts and other costs.

Contingency Plan:
A plan for regaining and maintaining compliance with the permit limits and for reestablishing best available technology as defined in the Permit.

Discrepancy in Pad Integrity:
Either: 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width) or 2) any significant deterioration or damage of the pad surface.

3 RESPONSIBILITIES

Responsibilities are provided in the BAT Performance Monitoring Plan.

4 CONTINGENCY PLAN

Energy*Solutions* is responsible for implementing the contingency plan for any identified failure of BAT in accordance with the BAT Performance Monitoring Plan. The contingency actions required for failures of BAT are listed below by facility.

4.1 All Evaporation Ponds:

4.1.1 Evaporation Pond Freeboard Level at Three Feet

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.

4.1.2 Evaporation Pond Freeboard Exceedance:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will immediately direct the removal of water from the pond via pumping until the minimum freeboard level is obtained, if approved water storage capacity is available. Water from the evaporation pond with a freeboard exceedance may be stored in another approved evaporation pond.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.1.3 Leakage of Pipeline from Leak Detection System to Evaporation Pond

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The pipeline will be repaired.

4. If the pipeline cannot be repaired within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.1.4 Average Leakage Rate at Initial Action Level:

The initial action levels for each pond are listed below:

Evaporation Pond	**Initial Action Level for Average Leakage Rate (in gallons)**
1995 Evaporation Pond	155
1997 Evaporation Pond	160
2000 Evaporation Pond	355
Northwest Corner Evaporation Pond	300
Mixed Waste Evaporation Pond	160

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will notify the Manager, Engineering and Maintenance.
4. Within five days the Manager, Engineering and Maintenance will perform a pump down test to determine the accuracy of the flow meter.
    a. The pump down test will entail the collection of water into a container with a known capacity as it is discharged from the Leak Detection System pump pipeline.
    b. The water in the container will be measured and compared with the Leak Detection System meter to determine the system accuracy.
    c. A report will be prepared and submitted to the DRC presenting the accuracy of the pump system.

4.1.5 Average Leakage Rate Exceedance :

The allowable average leakage rate for each pond is listed below:

Evaporation Pond	**Allowable Average Leakage Rate (in gallons)**
1995 Evaporation Pond	162
1997 Evaporation Pond	171
2000 Evaporation Pond	382
Northwest Corner Evaporation Pond	326
Mixed Waste Evaporation Pond	171

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
4. The Manager, Compliance and Permitting will provide written notification and a proposed corrective action plan and schedule to the DRC within seven calendar days of discovery.
5. A calculation from the monitored leakage rate will be evaluated by the Manager, Engineering and Maintenance to determine the probable size and location of the leak(s). This calculation will assess if the defect can be identified by performing a visual inspection.
    a. If the defect can be identified by visual inspection, the water level will be reduced to a level designated by the Manager, Engineering and Maintenance to bring the average leakage volume below the allowable rate. Water may be placed in an approved evaporation pond.
    b. If the leak(s) are determined too small for visual inspection, a leak location survey will be performed. Energy*Solutions* will include a Leak Survey Report with the HDPE Liner Repair Report detailing how the survey was conducted and provide the survey results, including the number and location of all leaks.
6. Defects in the liner will be repaired in accordance with the corrective action plan and schedule.
7. Energy*Solutions* shall submit for DRC approval an HDPE Liner Repair Report certified by a Utah Licensed Professional Engineer certifying all liner repair and testing procedures and quality assurance activities and documentation were performed in accordance with the corrective action plan and schedule. The report shall also include an estimate of the total volume of liquids released from the pond to the subsurface.

4.1.6 <u>Fluid Head Level Exceedance (1 Foot Level Above the Lowest Point in the Lower Flexible Membrane Liner):</u>

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
4. The pump and process controller will be checked for proper activation within 24 hours and adjusted or replaced if necessary.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.2 1995/1997 Evaporation Pond Lift Station:

4.2.1 Water Level Above the Lowest Level of the Inlet Pipe (Visual Alarm Activated):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The IUF, Rail Wash Facility on Track No. 2, Containerized Waste Storage Pad, and Rail Digging Facility~~, and Rail Rollover Facility~~ will be placed out of service.
3. The sump will be inspected to see if functioning properly.
4. If the sump pump requires repair or replacement it will occur within the same working day.
5. An inspection of the drainage system will occur to determine if blockage is present.
6. If blockage is present it will be removed to restore free drainage.
7. When free drainage is restored, the facilities may be placed back in service.
8. If blockage cannot be removed or is not removed within the same working day, the Manager, Waste Disposal Operations will provide notification to the Manager, Compliance and Permitting and the QAM.
9. The QAM or Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
10. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.3 2000 Evaporation Pond Water Transfer Pad

4.3.1 Lack of Free Drainage:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Water management activities at the transfer pad will cease.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, water management activities may resume.
7. If free drainage is not restored within the same working day, the Manager, Waste Disposal Operations will notify the QAM or the Manager, Compliance and Permitting.
8. The Manager, Compliance and Permitting or QAM will provide verbal notification to the DRC within 24 hours of identification.
9. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.3.2 Water Level in Sump Above Grate

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.

2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting .
3. Water management activities at the 2000 Evaporation Pond will cease.
4. Water will be removed from the sump.
5. When water is removed from the sump, water management activities may resume.
6. If water is not removed within the same working day, the Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
7. The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting.
8. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
9. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.3.3 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting.
3. The Facility Operator or BAT Inspector will cease water management activities at the transfer pad.
4. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will submit just cause in writing to the Director.
6. Upon completion of repairs, water management activities may resume.
7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.4 Northwest Corner Evaporation Pond Transfer Facility:

4.4.1 Tear, gap, or hole found between concrete apron and HDPE liner:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and the Manger, Compliance and Permitting.
3. The Facility Operator or BAT Inspector will cease water management activities at the transfer facility.
4. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 7 days after receiving notification.

5. Repairs will be completed within 30 working days of discovery or the Manager, Compliance and Permitting will submit just cause in writing to the Director.
6. Upon completion of repairs, water management activities may resume.
7. If repairs are not performed within 30 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.4.2 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting.
3. The Facility Operator or BAT Inspector will cease water management activities at the transfer facility.
4. The Manager, Waste Disposal Operations will schedule repairs to the pad within 7 days after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will submit just cause in writing to the Director.
6. Upon completion of repairs, water management activities may resume.
7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~*4.5 Rail Rollover Facility:*~~

~~4.5.1 Lack of Free Drainage from the Berm, Through the Trough, to the Settling Basin, and Continuing to the Sump:~~

~~1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.~~
~~2. The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting.~~
~~3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).~~
~~4. An inspection of the drainage system (berm, trough, settling basin to sump) will occur to determine if blockage is present.~~
~~5. If blockage is present it will be removed to restore free drainage.~~
~~6. When free drainage is restored, waste management activities may resume at the facility.~~

7. ~~If free drainage is not restored within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.~~
8. ~~The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.~~

~~4.5.2 Water Level in Sump Above Grate:~~

1. ~~The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.~~
2. ~~The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting.~~
3. ~~Waste management activities will cease (waste may be removed from the facility).~~
4. ~~The sump pump will be inspected to see if functioning properly.~~
5. ~~If the sump pump requires repair, replacement, or blockage removal it will occur within the same working day.~~
6. ~~When sump pump has been repaired, etc., waste management activities may resume at the facility.~~
7. ~~If the sump pump is not repaired, replaced, or blockage removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.~~
8. ~~The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.~~

~~4.5.3 Ponded Water Within the Covered Area of the Facility~~

1. ~~The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.~~
2. ~~The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.~~
3. ~~Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).~~
4. ~~Removal of water shall occur in accordance with priorities as listed in Part I.E.7.(c) of the Permit~~

~~4.6~~4.5 ***Containerized Waste Storage Pad:***

~~4.6.1~~4.5.1 Water Above the Sump Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).
4. An inspection of the drainage system will occur to determine if blockage is present.

5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, waste management activities may resume at the facility.
7. If free drainage is not restored within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.6.2~~4.5.2 Discrepancy in Exposed Storage Pad Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the major discrepancy.
4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings.
5. No storage will occur in the marked area until repairs are complete.
6. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
7. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
8. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
9. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.6.3~~4.5.3 Improper Labeling or Storage of Waste:

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

~~4.7~~*4.6 East Truck Unloading Area:*

~~4.7.1~~4.6.1 Troughs More Than Three Quarters Full:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Waste Management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).

4. If blockage is present it will be removed to restore drainage.
5. When free drainage is restored, waste management activities may resume at the facility.
6. If free drainage is not restored within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide notification to the DRC within seven calendar days of discovery.

~~4.7.2~~4.6.2 Discrepancy in Exposed Surface Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the discrepancy.
4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings.
5. No waste management will occur in the marked area until repairs are complete.
6. The Manager, Waste Disposal Operations will schedule repairs to the exposed surface within 48 hours after receiving notification.
7. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
8. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that repairs were not performed.
9. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.7.3~~4.6.3 Containers Without Current Date on Bates Label on Asphalt Surfaces:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).
4. The container(s) will be removed from the asphalt surface
5. When the container(s) have been removed, waste management activities may resume at the facility.
6. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.7.4~~4.6.4 Improper Labeling or Storage of Waste on Concrete Holding Pads:

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

~~4.8~~4.7 Intermodal Unloading Facility:

~~4.8.1~~4.7.1 Water Above the Sump Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, waste management activities may resume at the facility.
7. If free drainage is not restored within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.8.2~~4.7.2 Discrepancy in Exposed Pad Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the major discrepancy.
4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings.
5. No storage will occur in the marked area until repairs are complete.
6. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
7. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
8. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.

9. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.8.3~~4.7.3 Improper Labeling or Storage of Waste:

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

~~*4.9*~~*4.8 Intermodal Unloading Facility Lift Station*

~~4.9.1~~4.8.1 Water Level Above the Lowest Level of the Inlet Pipe (Visual Alarm Activated):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The IUF, Rail Wash Facility on Track No. 2, and Rail Digging Facility ~~and Rail Rollover Facility~~ will be placed out of service.
4. The sump will be inspected to see if functioning properly.
5. If the sump pump requires repair or replacement it will occur within the same working day.
6. An inspection of the drainage system will occur to determine if blockage is present.
7. If blockage is present it will be removed to restore free drainage.
8. When free drainage is restored, the facilities may be placed back in service.
9. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
10. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~*4.10*~~*4.9 LARW Box Washing Facility:*

~~4.10.1~~4.9.1 Lack of Free Drainage to the Sump Continuing to the Concrete Holding Tanks:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The drainage system will be inspected for blockage.
5. The sump pump will be inspected to see if functioning properly.
6. If the sump pump requires repair or replacement it will occur within the same working day.
7. If blockage is present within the drainage system, it will be removed within the same working day.

8. When drainage is restored via blockage removal or sump pump repair, the facility may be placed back in service.
9. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
10. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.10.2~~4.9.2 Pipeline Cap from the Building Not Intact:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. Water will be removed from the sump.
5. Evaluate whether there has been a discharge from the facility. If so, implement the Emergency Response Plan.
6. The cap will be replaced.
7. When cap is replaced, the facility may be placed back in service.
8. If cap cannot be replaced within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
9. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.10.3~~4.9.3 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations ~~v~~will schedule repairs within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.10.4~~4.9.4 Water Level in the Holding Tanks Greater Than Three Quarters (3/4) Full:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The water will be removed
5. Upon completion of water removal, the facility may be placed back in service.
6. If water cannot be removed, or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~*4.11*~~*4.10 Rail Wash Facility on Track No. 4:*

~~4.11.1~~4.10.1 Lack of Free Drainage to the Wash Bay Sump Pump Continuing to the Collection Tank(s) Within the Adjacent Equipment/Mechanics Building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The sump pump will be inspected to see if functioning properly.
5. If the sump pump requires repair or replacement it will occur within the same working day.
6. An inspection of the drainage system, including the concrete trench in the rail wash building will occur to determine if blockage is present.
7. If blockage is present it will be removed to restore free drainage.
8. When free drainage is restored, the facility may be placed back in service.
9. If blockage cannot be removed or is not removed within same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
10. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.11.2~~4.10.2 Failure of Gray Water Transfer System from the Collection Tank(s) to the 1997 Pond:

1. The Facility Operator or BAT inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Director of Compliance and Permitting.
3. Place the facility out of service.
4. Inspect the gray water transfer system (pump and piping) to see if it is operating correctly.

5. Perform repairs or replacement of the pump if necessary within the same working day.
6. Inspect the piping system, including Manholes 1 and 2 if needed to identify damage or leakage.
7. If the gray water transfer system cannot be repaired within same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.11.3~~4.10.3 Discrepancy in Exposed Pad Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.12~~4.11 Rail Digging Facility:

~~4.12.1~~4.11.1 Lack of Free Drainage of Water to the Collection Basins to the Sediment Basin:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.12.2~~4.11.2 Water Level in the Collection Basins Above the Elevation of the Outlet Pipe Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The outlet pipe will be inspected for blockage.
5. If blockage is present it will be removed to restore free flowing condition.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed, or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.12.3~~4.11.3 Water Level in the Sediment Basin Above the Elevation of the Outlet Pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The outlet pipe will be inspected for blockage.
5. If blockage is present it will be removed to restore free flowing condition.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed, or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.12.4~~4.11.4 Leakage of Stormwater Detected at the Digging Facility Manhole:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. When repairs are completed, the facility may be placed back in service.
5. If repairs cannot be made within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.12.5~~4.11.5 Discrepancy in Exposed Asphalt Pad and Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.13~~4.12 *Decontamination Access Control Building:*

~~4.13.1~~4.12.1 Lack of Free Drainage to the Wastewater Collection Tank:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service.
4. An inspection will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the bootwash, respirator sink, and sink next to shower may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.13.2~~4.12.2 Visual Alarms Located Inside the Building at the Bootwash and Respirator Sink Activated:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. If water is not removed from the collection tank within the same working day, the bootwash, respirator sink, shower, and sink next to shower will be placed out of service.

3. Upon completion of water removal, the out of service designation will be removed from the bootwash, respirator sink, shower, and sink next to shower.

~~4.13.3~~4.12.3 Water Level in the Wastewater Collection Tank Not Below the Bottom Elevation of the Inlet Pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service.
4. Water will be removed from the tank.
5. Upon completion of water removal, the out of service designation will be removed from the bootwash, respirator sink, shower, and sink next to shower.
6. If water is not removed, within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.13.4~~4.12.4 Presence of Fluids in Leak Detection System:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
6. Fluid will be collected from the leak detection system.
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
8. A written report including remediation plans if necessary will be submitted to the DRC.

~~4.14~~4.13 *Intermodal Container Wash Building:*

~~4.14.1~~4.13.1 Water Level in the Sediment Basin Sump At or Above the Weir Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.

2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. Water will be removed from the sump.
5. If water is not removed, within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.14.2~~4.13.2 Lack of Free Drainage from the Bootwash to the Troughs:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.14.3~~4.13.3 Lack of Free Drainage Through the Troughs to the Sediment Basin:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.14.4~~4.13.4 Presence of Fluids in Leak Detection System:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be taken out of service.
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
6. Fluid will be collected from the leak detection system.
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
8. A written report including remediation plans if necessary will be submitted to the DRC.

~~4.14.5~~4.13.5 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The affected bay(s) will be placed out of service.
4. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
6. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~*4.15*~~*4.14 Shredder Facility:*

~~4.15.1~~4.14.1 Lack of Free Drainage from Concrete Surface to Catchbasins:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present. Water will be removed from the sump.
5. If blockage is present, remove blockage.
6. Place facility back in service when free drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.15.2~~4.14.2 Presence of Leakage from Manhole 1 Pipeline to Water Storage Tanks:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Inspect the pipeline to determine source of leak.
5. Repair the pipeline.
6. If repairs cannot be completed within the same work day that the leak was discovered, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.15.3~~4.14.3 High Water Level Alarms Activated at the Water Storage Tank(s):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. The Manager, Waste Disposal Operations will schedule the manual removal of water from the storage tank.
5. If the water is not removed below the high water level within the same working day that the alarm was activated, the Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.

6. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
8. Upon completion of water removal below the high water level, the facility may be placed back in service.

~~4.15.4~~4.14.4 Valve to Alternate Wastewater Management System in Closed Position when Managing PCB Waste:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. Valve to the Rotary Dump Facility will be checked to ensure that it is in the closed position. If this valve is in the "open" position, the actions of 4.16.5, below, will be implemented.
5. The Manager, Waste Disposal Operations, together with the Manager, Compliance and Permitting, will assess the situation and open the valve to the alternate wastewater management system prior to placing the system back in service.

~~4.15.5~~4.14.5 Valve to Rotary Dump Facility in Open Position when Managing PCB Waste:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The Manager, Compliance and Permitting will determine necessary sampling activities.

~~4.15.6~~4.14.6 Facility Not Labeled for PCBs as Required:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The Facility Operator or BAT Inspector will ensure proper labeling of facility.
5. The facility will be placed back in service.

~~4.15.7~~4.14.7 Water Storage Tank Not Labeled as PCBs as Required:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations.

2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. The Facility Operator or BAT Inspector will ensure the tank is properly labeled.
5. The facility will be placed back in service.

~~4.15.8~~4.14.8 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
3. Repairs will be completed within 10 working days of discovery or the Manager, of Compliance and Permitting will provide just cause in writing to the Director.
4. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.15.9~~4.14.9 Shredded Material Remaining on the Outfeed Pad at End of Shift:

1. The Facility Operator will cease operation of the Shredder Facility.
2. The Facility Operator will notify the Manager, Waste Disposal Operations.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The Facility Operator will ensure that the material is no longer susceptible to wind dispersal as follows:
    a. Containerize shredded material; or
    b. Cover with a nominal 6” inches of soil or soil-like waste material; or
    c. Cover with a commercial fixative to prevent wind dispersal and leachate generation, applied in accordance with the manufacturer’s instructions.
5. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that shredded material was not removed by the end of shift.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that material was not removed from the outfeed pad by the end of the shift.
7. The Shredder Facility may not continue operation until the shredded material is removed.

~~4.16~~4.15 Rotary Dump Facility:

~~4.16.1~~4.15.1 Thaw Building:

~~4.16.1.1~~4.15.1.1 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.16.1.2~~4.15.1.2 Ponding of Water on the Granular Floor Surface of the Thaw Building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.1.3~~4.15.1.3 Blockage of Pipe from Thaw Building to Rotary Floor:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Remove blockage.
5. Place the facility back in service when drainage is restored.
6. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.

7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.2~~4.15.2 Wash Building:

~~4.16.2.1~~4.15.2.1 Discrepancy in Exposed Concrete Integrity of the curbing at the east end of the wash building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. An absorbent material will be placed along the curbing to deter water flow past the curb.
4. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
6. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.16.2.2~~4.15.2.2 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.16.2.3~~4.15.2.3 Integrity Breach at Surface Seal Around Footing

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.

2. The Facility Operator or BAT Inspector will place the Wash Building out of service.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The Manager, Waste Disposal Operations will schedule repairs to the surface seals within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
6. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.16.2.4~~4.15.2.4 Water Level Above Grates Within the Wash Building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.2.5~~4.15.2.5 Lack of Free Drainage from the Floor to the Trench:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be placed out of service.
4. Perform an inspection to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.3~~4.15.3 Rotary Building

~~4.16.3.1~~4.15.3.1 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.16.3.2~~4.15.3.2 Lack of Free Drainage from Rotary Dump Floor to Sediment Basin (When waste management activities are not occurring):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when free drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.3.3~~4.15.3.3 Water Level Above the Grate in the Sediment Basin:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Waste management activities at the facility will cease (waste may be removed from the facility).
4. The submersible pump will be inspected to see if functioning properly.

5. If the submersible pump requires repair or replacement, it will occur within the same working day.
6. The pipeline from the submersible pump to the northwest corner evaporation pond will be inspected for blockage.
7. If blockage is present within the pipeline it will be removed.
8. When blockage of pipeline is removed and/or pump repair or replacement has been completed, the facility may be placed back in service.
9. If blockage cannot be removed and/or pump repair/replacement cannot be completed, or is not completed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
10. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.3.4~~4.15.3.4 Presence of Fluids in Sediment Basin Leak Detection System:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The facility will be taken out of service.
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
6. Fluid will be collected from the leak detection system.
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
8. A written report including remediation plans if necessary will be submitted to the DRC.

~~4.16.3.5~~4.15.3.5 Presence of Fluids in Leak Detection System for the Pipeline from Rotary Building to the Northwest Corner Evaporation Pond:

1. The Facility Operator or BAT Inspector will return the observation valve to the closed position.
2. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The facility will be taken out of service.
5. The Facility Operator or BAT Inspector will close and lock the valve between the sediment basin and the Northwest Corner Evaporation Pond.
6. The Manager, Waste Disposal Operations will notify to the Manager, Compliance and Permitting of the desire to operate the facility using the Alternate Wastewater Management Area.

7. The Manager, Compliance and Permitting will provide verbal notification to the DRC.
8. Upon completion of DRC notification to use the Alternate Wastewater Management System, the Rotary Dump Facility may be placed in service.
9. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that fluids were present within the leak detection system.
10. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
11. Fluid will be collected from the leak detection system.
12. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
13. A written report including remediation plans if necessary will be submitted to the DRC.

~~4.16.4~~4.15.4 Alternate Wastewater Management Area (When Placed in Service and Locking Valve is in the "Open" Position)

~~4.16.4.1~~4.15.4.1 Presence of Leakage from Sediment Basin Pipeline to Water Storage Tanks:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Inspect the pipeline to determine origin of leak.
5. Repair the pipeline.
6. Place facility back in service when repairs are complete.
7. If repairs cannot be repaired within the same work day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.4.2~~4.15.4.2 Visual Alarm at One or Both Storage Tanks:

1. The Rotary Dump Facility will be placed out of service
2. Perform manual removal of water from the collection tank.
3. If the water is not removed within the same working day, the Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
4. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
5. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.

6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
7. Upon completion of water removal, the facility may be placed back in service.

~~4.16.4.3~~4.15.4.3 Ponding of Water on the Concrete Surface at the Alternate Wastewater Management Area:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Inspect the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.16.4.4~~4.15.4.4 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.17~~4.16 East Side Drainage System:

~~4.17.1~~4.16.1 Stormwater Management System:

~~4.17.1.1~~4.16.1.1 Catchbasin Water Level Above Outlet Pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.

2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Inspect the drainage system to determine why it is not free-draining.
4. Complete repairs as needed to restore free drainage within the same working day.
5. If free drainage is not restored within the same work day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.17.1.2~~4.16.1.2 Lift Sump Alarm Activated:

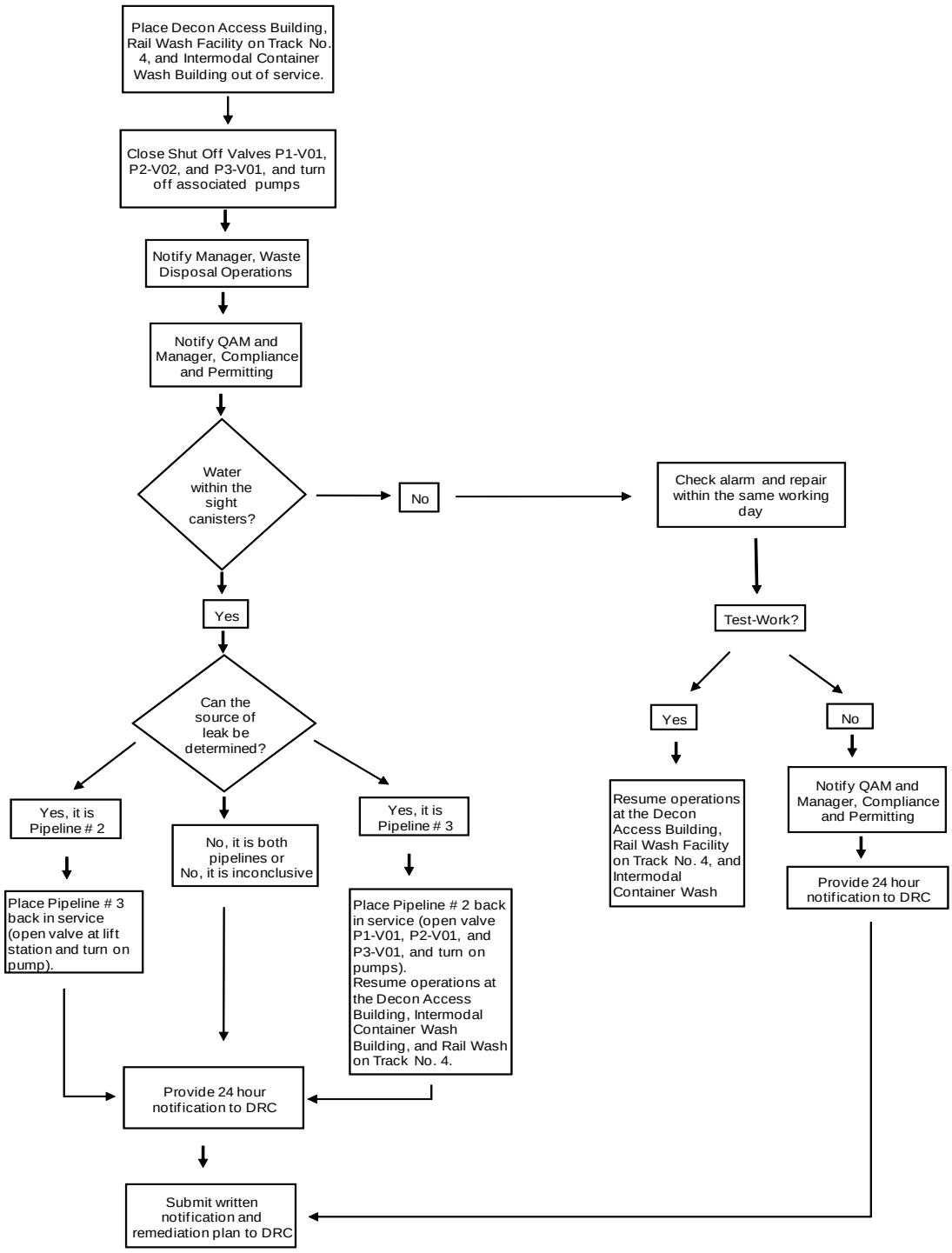
1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Inspect the alarm system to determine if functioning properly.
4. Inspect the sump pump(s) to determine if functioning properly.
5. If the sump pump(s) requires repair or replacement it will occur within the same working day.
6. If sump pump(s) cannot be repaired or replaced on the same working day of discovery, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.17.2~~4.16.2 East Side Drainage System Gray Water:

~~4.17.2.14~~4.16.2.1 Visual Alarm Activated at Manhole 1 (See Figure 1 of inspection form):

1. Perform Contingency Actions in accordance with the following Flow Chart.

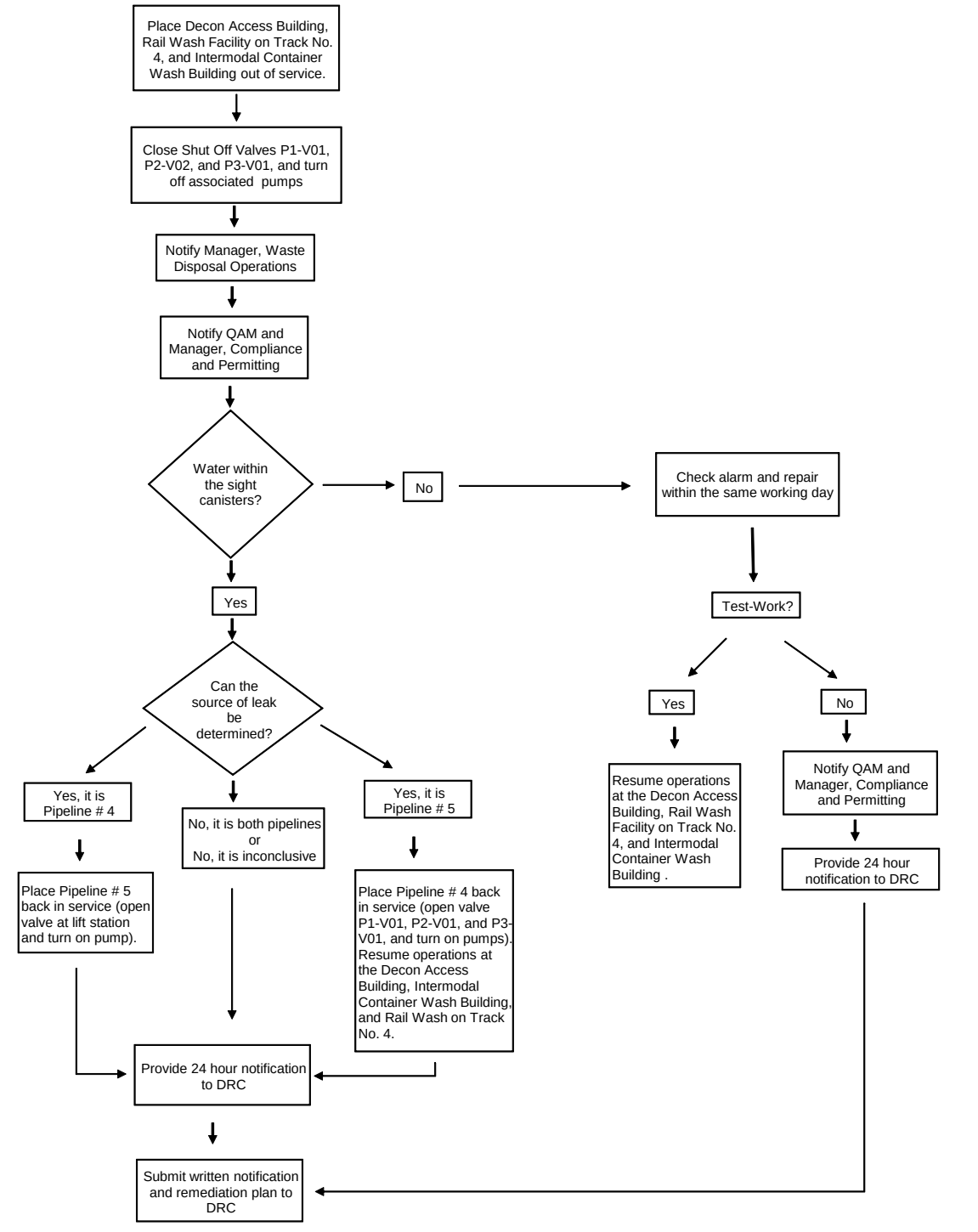
Alarm Activated at Manhole 1



~~4.17.2.24~~4.16.2.2 Visual Alarm Activated at Manhole 2 (See Figure 1 of inspection form):

1. Perform Contingency Actions in accordance with following Flow Chart.

Alarm Activated at Manhole 2



4.17.2.3 Failure of the carrier pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The affected shut-off valves will be closed, and associated pumps to affected facilities will be placed out of service.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting and Manager, Engineering and Maintenance.
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of confirmation and provide notification of manual water removal from affected facilities.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
6. The Manager, Engineering and Maintenance will schedule testing of the containment pipe(s).
7. The containment pipe(s) will be tested based on the ASTM-F1417 method.
8. Upon completion of containment pipe testing, findings will be documented and a report submitted to the DRC within 30 calendar days. The report will include any completed or scheduled remediation.
9. Once remediation efforts have been completed, verification of the containment pipe repairs and remediation will be performed under the direction of and certified by a certified Professional Engineer.
10. The facility will be placed back into service.

~~*4.18*~~*4.17* ***South Ditch***

~~4.18.1~~4.17.1 Pump system not functioning as designed: green light not activated when pump is present and operating:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM, Manager, Engineering and Maintenance, and Manager, Compliance and Permitting.
3. The Manager, Engineering and Maintenance will schedule repairs within 48 hours after receiving notification.
4. Repairs will be completed within 14 calendar days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.18.2~~4.17.2 Pump system not functioning as designed (pump is present but not operating with or without activation of green light):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM, Manager, Engineering and Maintenance, and Manager, Compliance and Permitting.
3. Manual removal of water will begin within the same working day.
4. The Manager, Engineering and Maintenance will schedule repairs of the pump system within 48 hours after receiving notification.
5. Repairs will be completed within 14 calendar days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
6. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.18.3~~4.17.3 Pump system not functioning as designed (blue light not activated when water is above the sump grate):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM, Manager, Engineering and Maintenance, and Manager, Compliance and Permitting.
3. The Manager, Engineering and Maintenance will schedule repairs within 48 hours after receiving notification.
4. Repairs will be completed within 14 calendar days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.18.4~~4.17.4 Grate less than 75% clear of debris (determined during monthly pump and indicator light inspection):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. Debris removal will be completed within 48 hours of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
3. If debris removal is not performed within 48 hours of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting

will provide verbal notification to the DRC within 24 hours of identification that the debris removal was not performed.
4. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that the removal was not performed.

~~4.18.5~~4.17.5 Manual water removal (only required when pump is not operating or has been removed during freezing weather) not initiated the same day as identification:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will schedule manual water removal.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~*4.19*~~*4.18 LLRW Operations Building:*

~~4.19.1~~4.18.1 High water level alarm (orange strobe) activated at the wastewater collection tank:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will schedule the manual removal of water from the storage tank.
3. If the water is not removed below the high water level by the end of the following workday after discovery, the Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.19.2~~4.18.2 High-high-level alarm (red strobe) activated at the wastewater collection tank:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. Place the wastewater generating systems (restricted area of the building) out of service.

4. The Manager, Waste Disposal Operations will schedule the manual removal of water from the wastewater collection tank.
5. If the water is not removed below the high water level within the same working day of discovery, the Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
6. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
8. Upon completion of water removal below the high water level, the facility may be placed back in service.

~~4.19.3~~4.18.3 Presence of fluids in the leak detection system

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM, Manager, Compliance and Permitting, and Manager, Engineering and Maintenance.
3. The wastewater generating systems (restricted area of the building) will be placed out of service.
4. The Manager, Engineering and Maintenance will determine the cause of the alarm and schedule repairs as needed.
5. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
6. If repairs to the inner (primary) tank are required, the tank shall be re-certified by an independent PE before being placed back into service.
7. If the sensor is determined to be faulty, the facility may be placed back into service once it is repaired or replaced and tested.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.20~~4.19 SRS DU Storage Building:

~~4.20.1~~4.19.1 Discrepancy in Exposed Asphalt Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The Manager, Waste Disposal Operations will schedule repairs to the exposed asphalt surface within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and

Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.20.2~~4.19.2 Evidence of container leakage, corrosion, or deterioration

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting.
3. An inspection will be performed to determine corrective actions as needed i.e. overpack of containers.
4. Corrective actions shall be completed and documented within the same working day.
5. If corrective actions cannot be completed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
6. If corrective actions cannot be completed with the same working day, the Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.20.3~~4.19.3 Presence of water on the asphalt surface

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will schedule water removal.
3. The Manager, Waste Disposal Operations will notify the QAM, Manager, Compliance and Permitting, and Manager, Engineering and Maintenance.
4. An inspection will be performed to determine the source of the water and schedule repairs as needed.
5. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.21~~4.20 Evaporation Pond Ancillary Equipment to Facilitate Evaporation:

~~4.21.1~~4.20.1 Contact wastewater spill outside of the pond and secondary containment:

1. The Facility Operator or BAT Inspector will implement the Emergency Response Plan. Implementation automatically notifies the Manager, Waste Disposal Operations, QAM, and Manager, Compliance and Permitting.
2. The spill will be cleaned up in accordance with the Emergency Response Plan. Initial (24-hour) and followup (7-day) reports will be made to the Director in accordance with that plan.

3. The ancillary equipment will be taken out of service until the cause of the spill has been determined and repaired.
4. Once the ancillary equipment has been repaired, 24 hour notification shall be provided to the Director prior to placing the system back into service.

~~4.21.2~~4.20.2 Damage to the evaporation pond liner:

1. The ancillary equipment will be taken out of service immediately.
2. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The Manager, Waste Disposal Operations will schedule repairs to the pond liner within 48 hours after receiving notification.
5. Once the pond liner has been repaired 24 hour notification shall be provided to the Director prior to placing the system back into service.
6. Repairs will be completed within 10 working days of discovery or the Manager, Compliance and Permitting will provide just cause in writing to the Director.
7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.22~~4.21 Contingency Actions for Qualitative BAT Performance Standards:

~~4.22.1~~4.21.1 Failure to complete inspections as required

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations.
2. The Facility Operator or BAT Inspector will perform missed inspection.
3. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
4. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of confirmation.
5. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

~~4.22.2~~4.21.2 Failure to Comply with Waste Disposal Location Requirements:

1. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of confirmation.

4. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.
5. The waste will be removed from the location and disposed of in the correct location.
6. Follow up sampling will be performed to ensure that all waste material placed incorrectly has been completely removed and a report containing sample analytical results will be submitted for DRC approval. Upon approval, waste placement within the sampled area may resume.

~~4.22.3~~4.21.3 Disposal of Unauthorized Wastes:

1. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC.
4. The Manager, Compliance and Permitting will provide written notification in accordance with the Permittee's Radioactive Material License.

~~4.22.4~~4.21.4 Failure to Construct as Per Approval Designated in I.E.3:

1. Upon discovery the Applicable Site Director or designee will be notified immediately.
2. The Applicable Site Director of designee will notify the QAM and Director of Compliance and Permitting or designees.
3. The QAM or the Director of Compliance and Permitting or designee will provide verbal notification to the DRC.
4. The Director of Compliance and Permitting or designee will provide written notification in accordance with the Permittee's Radioactive Material License.

~~4.22.5~~4.21.5 Failure to Complete a Portion of the Disposal Cell Within the Applicable Open Cell Time Limit:

1. Notify the Manager, Waste Disposal Operations
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery.
4. The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

~~4.22.6~~4.21.6 Failure to Comply with General Stormwater Management Requirements and Performance Criteria:

1. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.

3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery.
4. The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

~~4.22.7~~4.21.7 Failure to Comply with 11e.(2) Waste Management and Storage Requirements:

1. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery.
4. The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

~~4.22.8~~4.21.8 Failure to Comply with LLRW Waste Management Requirements:

1. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting.
3. The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery.
4. The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.