

MODULE IV - GROUNDWATER PROTECTION STANDARDS AT THE HWI

IV.A EXCEEDANCE OF HWI GROUNDWATER PROTECTION STANDARDS

- IV.A.1 USS shall notify the Executive Secretary in writing within fifteen days of receipt of verified analytical data if the groundwater protection standard in Condition III.C.2. has been exceeded in any of the following monitoring wells: MW-17D, MW-21, MW-22, MW-23, and MW24. The notification shall indicate which concentration limits have been exceeded. This notification is not required for the indicator parameters of pH, TOC, TOX, nitrates, sulphates, and specific conductance listed in Condition III.C.
- IV.A.2 Within 180 calendar days after issuance of this Permit, USS shall submit a Statistical Analysis Methodology to be utilized for evaluation of groundwater data generated in accordance with Module III. Upon approval by the Executive Secretary, the statistical methodology that will be included as Attachment 5 (Statistical Analysis Methodology). The Groundwater Protection Standard shall be considered exceeded when any hazardous constituent listed in Condition III.C. shows a statistically significant increase over its background value.
- IV.A.3 USS may make a demonstration that the groundwater protection standard was exceeded due to sources other than the CHWI or to errors in sampling, analysis or evaluation.
- IV.A.4 USS shall notify the Executive Secretary in writing, if demonstration will be made.
- IV.A.5 USS shall submit a report to the Executive Secretary, within 90 days of the notice in Condition IV.A.4, demonstrating that a source other than the HWI caused the groundwater protection standard to be exceeded as provided by Condition IV.A.1.
- IV.A.6 USS shall continue the compliance monitoring program in accordance with R315-8-6.10.
- IV.A.7 The Groundwater Protection Standard shall not be considered to be exceeded if USS makes a demonstration in accordance with Condition IV.A.3 and the demonstration is accepted by the Executive Secretary.
- IV.A.8 Except as provided in Module IV, the compliance period during which the groundwater protection standard applies will be the 30 years following certification of closure of the CHWI (July 29, 1991). If USS is conducting corrective action at the HWI at the end of the compliance period specified, or has not demonstrated for three consecutive years that the groundwater protection standard has not been exceeded, except as provided in Module IV, then the compliance period shall be extended until USS demonstrates in accordance with Module IV that the groundwater protection standard has not been exceeded for three consecutive years at the HWI compliance point wells as defined in

Condition III.A.3 which shall include downgradient compliance monitoring wells MW-5, MW-8, MW-9, MW-10, MW13, and MW-14D.