



State of Utah

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DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL

Scott T. Anderson
Director

NOTICE OF PUBLIC COMMENT
ATK Launch Systems Promontory – Post-Closure Permit Reissuance
UTD009081357

The Director of the Division of Waste Management and Radiation Control is seeking public comment on an application from ATK Launch Systems, Promontory to renew its Post-Closure Permit. The permit application has been reviewed by Division staff and a draft permit has been prepared.

The Post-Closure Permit directs the site management of surface impoundments that have been closed and capped at the facility. Monitoring and corrective action of contaminated groundwater that has been detected beneath the facility and the investigation and corrective action of numerous inactive waste management sites are also activities that are directed by the Post-Closure Permit.

The public comment period on the draft permit will commence on August 3, 2018 and end on September 17, 2018. A public hearing has been scheduled at 6:00 p.m. on Wednesday, September 5, 2018 at the Brigham City Public Library, located at 26 East Forest Street, Brigham City, Utah.

The draft permit and associated fact sheet can be reviewed at the following locations:

Division of Waste Management and Radiation Control
Multi Agency State Office Building
195 North 1950 West, 2nd Floor
Salt Lake City, Utah

Brigham City Public Library
26 East Forest Street
Brigham City, Utah

For the public's convenience, an unofficial copy of the draft permit and fact sheet is available on the Internet at "<https://deq.utah.gov/public-notices-archive/waste-management-radiation-control-public-notices>".

Written comments will be accepted if received by 5:00 p.m. on September 17, 2018 and should be submitted to the address below. Comments can also be hand delivered to the Division address above and must be received by 5:00 p.m. on September 17, 2018.

Scott T. Anderson, Director
Division of Waste Management and Radiation Control
Department of Environmental Quality

DSHW-2018-007064

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Comments can also be sent by electronic mail to: "dwmrcpublic@utah.gov". Comments sent in electronic format should be identified by putting the following in the subject line: Public comment on ATK Launch Systems, Promontory Draft Permit. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Under Utah Code Section 19-1-301.5, a person who wishes to challenge a Permit Order may only raise an issue or argument during an adjudicatory proceeding that was raised during the public comment period and was supported with sufficient information or documentation to enable the Director to fully consider the substance and significance of the issue.

For further information, contact Jeff Vandel of the Division of Waste Management and Radiation Control at (801)536-0257. In compliance with the Americans with Disabilities Act, individuals with special needs (including auxiliary communicative aids and services) should contact Kimberly Diamond-Smith, Office of Human Resources at (801) 536-4285, Telecommunications Relay Service 711, or by email at "kdiamondsmith@utah.gov".



ATK Launch Systems Inc. Promontory Facility Draft Permit Renewal Fact Sheet

ATK Launch Systems has submitted an application to the Division of Waste Management and Radiation Control to renew its state Post-Closure Permit. The current permit was issued on September 20, 2007.

ATK manufacturing activities consist of production and testing of solid rocket motor propellants, assembly of rocket motor segments, rocket motor restoration and production of military flares. From these operations, ATK generates treats and stores hazardous waste. ATK's Post-Closure Permit directs the site management of capped surface impoundments, the investigation and corrective action of waste management sites, and the monitoring and corrective action of contaminated groundwater that exists at the site. The facility is located in Box Elder County, approximately 30 miles northwest of Brigham City, Utah on State Highway 83.

The Division of Waste Management and Radiation Control has completed its review of the permit renewal application. A draft permit has been prepared and will be available for review during the public comment period which begins on August 3, 2018 and concludes on September 17, 2018, at 5:00 p.m.

A public hearing to receive comment on the draft permit has been scheduled for 6:00 p.m. on Wednesday, September 5, 2018 at the Brigham City Public Library located at 26 East Forest Street, Brigham City, Utah.

A fact sheet and the draft permit are available for review and copying during the public comment period at the following locations:

Division of Waste Management and Radiation Control
Multi Agency State Office Building
195 North 1950 West, 2nd Floor
Salt Lake City, Utah

Brigham City Public Library
26 East Forest Street
Brigham City, Utah

For the public's convenience, an unofficial copy of the fact sheet and the draft permit is available on the Internet at: <https://deq.utah.gov/public-notices-archive/waste-management-radiation-control-public-notices>

Written comments will be accepted if received by 5:00 p.m. on September 17, 2018 and should be submitted to the address below. Comments can also be hand delivered to the Division address above and must be received by 5:00 p.m. on September 17, 2018.

Scott T. Anderson, Director
Division of Solid and Hazardous Waste
Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Comments can also be sent by electronic mail to: swpublic@utah.gov. Comments sent in electronic format should be identified by putting the following in the subject line: public comment on the ATK Promontory Draft Post-Closure Permit. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Under Utah Code Ann. § 19-1-301.5, a person who wishes to challenge a permit order may only raise an issue or argument during an adjudicatory proceeding that was raised during the public comment period and was supported with sufficient information or documentation to enable the director to fully consider the substance and significance of the issue.

For further information, contact Jeff Vandel of the Division of Waste Management and Radiation Control at (801) 536-0257. In compliance with the Americans with Disabilities Act, individuals with special needs (including auxiliary communicative aids and services) should contact Larene Wyss, Office of Human Resources, at (801) 536-4281 TDD (801) 536-4284 or by email at lwys@utah.gov.

Prior to the Clean Water Act amendments of 1972, ATK's predecessor disposed of hazardous waste in twelve surface impoundments located on the facility. These surface impoundments were closed with waste in place and capped with impermeable covers in 1992. The impoundments are the primary source area for groundwater contamination that has been detected beneath the facility.

ATK currently monitors, and is required to implement corrective action for, the groundwater contamination that exists beneath the facility. In addition, ATK is working on the investigation and corrective action of numerous other waste management sites at the facility.

Site management of the capped surface impoundments, corrective action of waste management sites, and the monitoring and corrective action of contaminated groundwater is administered by ATK's Post-Closure Permit. The Permit consists of six Modules and six Attachments.

MODULES

Module I; Standard Conditions: Module I contains the standard permit conditions, outlined in Utah Admin. Code R315-270-30, that are required to be in all permits. These conditions include enforceability, effect of permit, permit actions and duties and requirements. Permit conditions regarding the duty to apply for permit reissuance, as applicable, and permit expiration are also included in Module I.

Module II; General Facility Conditions: Module II contains the general facility conditions, which include requirements for post-closure maintenance and monitoring, security, inspections, personnel training, preparedness and prevention, contingency plans, record keeping, liability and financial

assurance. Evaluation of these plans and procedures for the ATK facility was conducted prior to this permit reissuance.

Module III; Use of Property and Post-Closure Care for the Surface Impoundments and Photographic Waste Discharge Sites: Module III contains the requirements relating to land use restrictions, post-closure care and inspections of closed waste management sites, cost estimates for post-closure care, financial assurance and liability.

Module IV; Groundwater Monitoring: Module IV specifies the requirements applicable to groundwater monitoring including constituents and groundwater protection standards, wells and springs to monitor, frequency of monitoring, monitoring procedures, record keeping and reporting.

Module IV of the draft permit:

Reduces the frequency of monitoring from semiannually to annually;

Clarifies the groundwater monitoring well inspection requirements;

Clarifies the reporting requirements; and

Updates the Groundwater Protection Standard.

Module V; Post-Closure Groundwater Corrective Action: Module V identifies the requirements associated with groundwater corrective action. These requirements include conditions for the development of Human Health and Ecological Risk Assessments, groundwater flow and solute transport models, corrective measures study and implementation, duration of corrective action and financial assurance for corrective action.

Module VI; Corrective Action for Solid Waste Management Units: Module VI specifies the requirements applicable to corrective action of waste management sites. These Permit Conditions include identification of the sites, requirements for investigation of the sites, plans for corrective action, determination of no further action, site management and reporting.

Module VI of the draft permit:

Updates the list of Solid Waste Management Units (SWMUs) that still require investigation or corrective action;

Modifies the process for addressing SWMUs;

Clarifies the requirements for corrective action and site management; and

Clarifies reporting requirements.

ATTACHMENTS

The Attachments contain detailed information regarding the Permit Conditions that are presented in the Modules. The Attachments included in the Draft Permit, and any significant changes from the existing Permit that are proposed, are listed below:

Attachment 1 - Security and Maintenance Plan

ATK has entered into Environmental Covenants with the Division of Waste Management and Radiation Control for the sites that have been closed at the facility, but have land use restrictions. These Environmental Covenants establish the locations of the sites, identify the contaminants that exist and identify the land use restrictions that are in effect. The Environmental Covenants have been added to Attachment 1.

Attachment 2 – Inspection Schedules and Procedures

ATK modified the Groundwater Monitoring System Annual Inspection Checklist, which is included with this Attachment. The changes will make conducting these inspections and reporting the results more efficient.

Attachment 3 – Quality Assurance Project Plan and Groundwater Sampling and Analysis Plan

The Quality Assurance and Groundwater Sampling and Analysis have been updated.

Attachment 4 – Groundwater Monitoring System

One well has been added to the list of wells that comprise the groundwater monitoring system.

Attachment 5 – Monitoring Well Completion Report Requirements

Attachment 6 – Solid Waste Management Unit (SWMU) List

The list of SWMUs has been updated to reflect progress that has been made on the investigation and corrective action of SWMUs at the facility.