

**STATEMENT OF BASIS**  
**Clean Harbors Grassy Mountain Facility – UTD991301748**  
**Class 3 Permit Modification to Increase Surface Impoundment and**  
**Landfill Cell Capacity**

Clean Harbors Grassy Mountain, LLC (Grassy Mountain) is a subsidiary of Clean Harbors, Inc., which is headquartered in Norwell, Massachusetts. The facility is located approximately 80 miles west of Salt Lake City, Utah, in the Great Salt Lake Desert. The facility is a treatment, storage and disposal facility for PCB and hazardous waste streams.

On December 1, 2017, Grassy Mountain submitted a Class 3 permit modification request that, if approved, would allow the construction of Surface Impoundment B and Landfill Cell 8. Note that while the current modification request provides for the construction of Cell 8, the geotechnical analysis was also submitted for Cells 8 through 13. The permit modification request was accompanied with the following documentation.

Landfill Cells 8 through 13 – Design Engineering Report (Note: While the current permit modification

Surface Impoundment B – Design Engineering Report

Attachment II-7 – Closure Plan

Attachment VI-2, Appendix A – Construction Quality Assurance Plan For Construction of Surface Impoundments, Landfills, and Landfill Closures

Certain modules of the Permit were modified to reflect the construction of a new surface impoundment and landfill cell. Because Title R315 citations had been updated since the Permit was reissued in 2012, all modules were updated to reflect the change.

See the attached table for specific changes to the Permit.

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 CLASS III PERMIT MODIFICATION

<b><u>Module</u></b>	<b><u>Module/Page No. Modification</u></b>	<b><u>Summary of Modification</u></b>	<b><u>Action Required</u></b>
Module I - Standard Permit Conditions	Page 10 Condition I.T	Deleted language describing compliance schedules, no replacement language provided	Replace Module I with updated version
	Page 12 Condition I.BB	Updated Agency Name to Division of Waste Management and Radiation Control	Replace Module I with updated version
	Page 15 - Condition I.FF	Updated Definition of Director to include new agency name	Replace Module I with updated version
	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module I with updated version
Module II – General Facility Conditions	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module II with updated version
Module III - Storage and Treatment in Containers	Page 4 - Condition III.G.4.d.	Deleting language referencing Small Heat Tent. Small Heat Tent has been clean closed	Replace Module III with updated version
	Page 5 - Condition III.K.	Deleted language referencing HT-S (heat tent - small) Small heat tent has been clean closed	Replace Module III with updated version
	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module III with updated version
Module IV	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module IV with updated version

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Module V - Surface Impoundments	Module 5 Cover Page	Updated title of Module V from "Surface Impoundment" to "Surface Impoundments"	Replace Module V with updated version
	Table of Contents	Updated Table of Contents from Surface Impoundment to Surface Impoundments	Replace Module V with updated version
	Page 1 - Condition V.A.1	Added reference to Surface Impoundment B	Replace Module V with updated version
	Page 1 - Condition V.A.2.	Added language stating maximum operating capacity for Surface Impoundment B	Replace Module V with updated version
	Page 1 - Condition V.A.3.2.	Added language describing dimensions and construction of Surface Impoundment B	Replace Module V with updated version
	Page 1 - Condition V.B.1.	Added reference to Surface Impoundment B	Replace Module V with updated version
	Page 1 - Condition V.B.2	Added reference to Surface Impoundment B	Replace Module V with updated version
	Page 3 - Condition V.D.1.	Added "each" and deleted "A" to permit to incorporate Surface Impoundment B into this requirement	Replace Module V with updated version
	Page 3 - Condition V.D.3.	Added "each" to permit to incorporate Surface Impoundment B into this requirement	Replace Module V with updated version
	Page 4 - Condition V.F.1.	Added "each" and deleted "A" to permit to incorporate Surface Impoundment B into this requirement	Replace Module V with updated version
	Page 4 - Condition V.F.2.	Added "any" and deleted "A" to permit to incorporate Surface Impoundment B into this requirement	Replace Module V with updated version
	Page 4 - Condition V.G.1. through Condition V.G.4	Added "a" and deleted "the" to permit to incorporate Surface Impoundment B into this requirement	Replace Module V with updated version
Page 5 - Condition V. H.1	Added "a" and deleted "the" to permit to incorporate Surface Impoundment B into this requirement.	Replace Module V with updated version	

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Module V - Surface Impoundments	Page 5 - Condition V. H.2 and Condition V.I	Add "a" to permit to incorporate Surface Impoundment B into this requirement.	Replace Module V with updated version
	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module V with updated version
Module VI - Disposal in Landfills	Page 1 - Condition VI.A.1	Added cell capacity volumes to summary table	Replace Module VI with updated version
	Page 3 - Condition VI.B.3	Added language to include Cells 8 - 13 in this permit condition	Replace Module VI with updated version
	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module VI with updated version
Module VII - Groundwater Monitoring	Page 1 - Condition VII.A.1.	Added reference to Surface Impoundment B and Landfill Cells 8 through 13	Replace Module VII with updated version
	Page 4 - Condition VII.A.5.i.	Deleted Wells MW-78 and MW-79 and renamed as MW-78A and MW-79A	Replace Module VII with updated version
	Page 4 - Conditions VII.A.5.m. through Condition VII.A.5.s.	Added language creating waste management areas and point of compliance well networks that incorporate Surface Impoundment B and Landfill Cell 8 through Landfill Cell 13 into the permit	Replace Module VII with updated version
	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module VII with updated version
Module VIII – Corrective Action Plan Development Procedures for Groundwater Contamination	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module VII with updated version
Module IX - Post-Closure Plan	Page 1 - Condition IX.A.4	Updated language adding Cells 8 - 13 to this permit condition. Deleted partial sentence that was a holdover from previous version.	Replace Module IX with updated version.
	Page 7 - Table IX-1	Added language incorporating Cells 8 - 13 into the table	Replace Module IX with updated version.

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Module IX - Post-Closure Plan	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module VII with updated version
Module X – Waste Management Plan for PCBs	Throughout the Module	Citations were updated to reflect the changes made in R315 of the Utah Administrative Code	Replace Module X with the updated version.
Attachment II-3 - Inspection Plan	Pages 7 & 8- Inspection Schedules	Language updated from Surface Impoundment updated to Surface Impoundments	Replace Attachment II-7 with updated version
	Forms RA01, RD08, RQ02, RW03, RW06A, & RW09	Updated forms included that incorporate newly installed monitoring wells for Disposal Cells 8 - 13 and Surface Impoundment B.	Replace existing forms with updated forms.
Attachment II-7 - Closure Plan	Entire Attachment	Revised and updated current version of Attachment II-VII to incorporate closure of Disposal Cells 8 - 13 and Surface Impoundment B.	Remove Current version of Attachment II-VII and replace with updated version
Attachment VI-2, Appendix A Construction Quality Assurance Plan	Entire Attachment	Revised and updated current version of Attachment II-VII to incorporate closure of Disposal Cells 8 - 13 and Surface Impoundment B.	Replace existing attachment with the updated version
Attachment VI-4 - Stormwater Management	Page 1 - Stormwater Management Section	Text updated from seven to nine stormwater ponds	Replace Attachment VI-4 with updated version
Landfill Cells 8 through 13 – Design Engineering Report	This is a new submittal	The Design Engineering Report covers all aspects of the construction of Landfill Cells 8 through 13 and the geotechnical investigation conducted in support of the design	New standalone document
Surface Impoundment B – Design Engineering Report	This is a new submittal	The Design Engineering Report covers all aspects of the construction of Surface Impoundment B and the geotechnical investigation conducted in support of the design	New standalone document