

## **ATTACHMENT 3-8 DTTF CLOSURE AND POST-CLOSURE PLAN**

### **1.0 INTRODUCTION**

This attachment provides closure and post-closure plans for the Dugway Thermal Treatment Facility (DTTF) at Dugway Proving Ground (DPG) as required by Utah Administrative Code (Utah Admin. Code) R315-264-110 through 120. This attachment is organized in the following sections:

- Closure Plan for DTTF, and
- Financial Requirements.

### **2.0 CLOSURE PLAN FOR DTTF: 40 CODE OF FEDERAL REGULATIONS (CFR) 264.178; UTAH ADMIN. CODE R315-264-178**

This section describes the procedures that will be used to perform closure of the DTTF at DPG. Post-closure care of the DTTF is not required because assessment is ongoing annually and all hazardous waste and hazardous waste constituents will be removed or decontaminated during closure operations.

Prior to implementation, this plan will be updated for consistency with new rules, requirements, and to include sampling methods and procedures. Updates to the plan require a permit and must be approved by the Director, Utah Division of Waste Management and Radiation Control (Director) prior to plan implementation.

Closure of the DTTF is discussed in the following sections:

- Content of the Closure Plan,
- Closure Performance Standard,
- Schedule for Closure,
- Disposal or Decontaminations of Equipment, Structures, and Soils,
- Post-Closure Plan,
- Certification of Closure, and
- Survey Plat.

### **2.1 CONTENT OF THE CLOSURE PLAN: 40 CFR 264.112(b); UTAH ADMIN. CODE R315-264-112(b)**

When the U.S. Army determines that final closure of the DTTF should commence, a detailed up-to-date closure plan will be completed and submitted to the Utah Division of Waste Management and Radiation Control (UDWMRC). Submission of the closure plan will require a modification to the existing permit and a public comment period prior to beginning closure activities.

The final closure plan will include:

- A description of how the DTTF will be closed in accordance with the closure performance standard required by Utah Admin. Code R315-264-110 through 120;
- A description of how final closure of the DTTF will be conducted;
- An estimate of the maximum inventory of hazardous waste that was ever on-site;
- A description of the methods to remove, transport, treat, store, or dispose of all hazardous wastes generated during closure;

- A description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated equipment, system components, structures, and soils;
- A description of all other activities necessary to meet the closure performance standard;
- A schedule for closure; and
- Closure clean-up criteria to meet the requirements of Utah Admin. Code R315-101.

**2.2 CLOSURE PERFORMANCE STANDARD: 40 CFR 264.111; UTAH ADMIN. CODE R315-264-111**

Closure performance standards will be addressed in the plan submitted prior to final closure. These standards will include source cleanup of potential explosive constituents.

**2.3 SCHEDULE FOR CLOSURE: 40 CFR 264.112(b)(6); UTAH ADMIN. CODE R315-264-112(b)(6)**

No specific date for the DTTF closure has been scheduled. When it is determined that closure of the DTTF can begin, a detailed closure plan will be submitted to UDWMRC and will include a schedule for closure. Closure activities will not begin until after the final closure plan is approved. It is anticipated that closure can be completed within one hundred eighty (180) days of receiving approval of the final closure plan from UDWMRC .

**2.4 DISPOSAL OR DECONTAMINATION OF EQUIPMENT, STRUCTURES, AND SOILS: 40 CFR 264.114; UTAH ADMIN. CODE R315-264-114**

All contaminated equipment, structures, and soils will be properly decontaminated and disposed of in compliance with standards for generators of hazardous waste.

**2.5 POST-CLOSURE PLAN: 40 CFR 264.117 THROUGH 120; UTAH ADMIN. CODE R315-264-117 THROUGH 120**

A post-closure plan will not be required because hazardous waste will not remain at the DTTF after closure. The property will remain in the custody of the Army.

**2.6 CERTIFICATION OF CLOSURE: 40 CFR 264.115; UTAH ADMIN. CODE R315-264-115**

Within sixty (60) days of completion of closure, DPG will submit to the Director and the U.S. Environmental Protection Agency (EPA) Regional Administrator, by registered mail, certification that the DTTF has been closed in accordance with the approved closure plan. The certification will be signed by the Installation Commanding Officer and an independent registered professional engineer. Documentation supporting the engineer's certification will be furnished upon request.

**2.7 SURVEY PLAT: 40 CFR 264.116; UTAH ADMIN. CODE R315-264-116**

The DTTF is not a disposal facility; therefore, a survey plat is not required.

**3.0 FINANCIAL REQUIREMENTS: 40 CFR 264.142; UTAH ADMIN. CODE R315-264-142**

A closure cost estimate and financial assurance mechanism are not required for this facility since 40 CFR 264.140(c); Utah Admin. Code R315-264-140(c) exempts the Federal government from these requirements.