

Fact Sheet

**Draft Permit Renewal
Draft Post-Closure Permit Issued for the
Closed Hazardous Waste Management Facility
BP Products North America, Inc.
1700 North 1200 West
Salt Lake City, Utah
EPA ID No: UTD000826370**

On July 5, 2018, BP Products North America, Inc. (BPPNA) submitted an application to the Division of Waste Management and Radiation Control (Division) to renew its Post-Closure Permit for post-closure care and groundwater monitoring at the Closed Hazardous Waste Management Facility (CHWMF), approximated located at 1700 North 1200 West, in Salt Lake City, Utah. The post-closure permit was initially issued to Amoco Oil Company, a predecessor to BPPNA in 1986 for closure, post-closure care, and monitoring of the Closed Hazardous Management Facility consisting of four hazardous waste disposal surface impoundments and two evaporation ponds. The permit was renewed in 1997 and 2007, and is now proposed for the current renewal. The Division has been working with the BPPNA to update the groundwater monitoring for the CHWMF in the last two years.

The post-closure care and groundwater monitoring started in 1991 in accordance with the Post-Closure Permit after the surface impoundments were closed in place with installation of a L-shaped slurry wall around the surface impoundments. The purpose of the slurry wall was to contain any hazardous waste or constituents, or breakdown and decomposition products in place and also prevent contaminants in the groundwater from migrating off-site. The Post-Closure Permit requires that the monitoring be conducted in a manner in order to ensure detection of a release of hazardous waste, hazardous waste constituents, leachate, contaminated runoff or hazardous waste decomposition products to the soil, groundwater, or surface water from the closed facility.

The Division of Waste Management and Radiation Control has completed its review of the permit renewal application. A draft permit has been prepared and is available for review during the public comment period, which begins on August 21, 2020 and will conclude on October 6 2020, at 5:00 p.m.

The draft permit is available for review during the public comment period at the following location:

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

BP Products North America, Inc.
Draft Permit Fact Sheet

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

Written comments will be accepted if received by 5:00 p.m. on October 6, 2020 and should be submitted to the address above.

Ty Howard, Director
Division of Waste Management and Radiation Control
Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

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 BP Draft Post-Closure Permit Renewal. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Following the public comment period on the BPPNA Post-Closure Permit, all public comments will be evaluated and where appropriate will be included in the final decision on whether to reissue the permit. A final permit determination will then be made and the corresponding action taken.

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.

A post-closure permit was initially issued to Amoco Oil Company, a predecessor to BP Products North America, Inc. (BPPNA) in 1986 for closure, post-closure care, and monitoring of the Closed Hazardous Management Facility consisting of four hazardous waste disposal surface impoundments and two evaporation ponds. The site is located approximately 1700 North and 1200 West in Salt Lake City, Utah. The post-closure care and groundwater monitoring started in 1991 after the surface impoundments were closed in place with installation of a L-shaped slurry wall around the surface impoundments and the evaporation ponds. The purpose of the slurry wall was to contain any hazardous waste or constituents, or breakdown and decomposition products in place and also to prevent contaminants in the groundwater from migrating off-site.

The draft Post-Closure Permit consists of five modules and one attachment. A summary of each is provided below with the significant changes from the review noted. In June 2016, Title R315 of the Utah Administrative Code waste substantially changed. Most of the changes involved modification of the numbering of the Code. This resulted in a document where the numbering BP Products North America, Inc.

system reflected, to a large extent, the numbering system used in the Code of Federal Regulations (CFR). As a result, a citation that began as 40 CFR 264.32(a) became R315-264-32(a). There are exceptions to the changes, but they are few. Also, references in the Permit to the Utah Solid and Hazardous Waste Control Board were updated to the Division of Waste Management and Radiation Control, to reflect an agency name change.

Module I, Standard Conditions

I.I Continuation of Expiring Permit was specified in accordance with R315-264-117(a)(2)(ii) of Utah Admin. Code.

I.L Proper Operation and Maintenance were modified to reflect the requirements of the CHWMF in accordance with the permit.

I.O.1 The CHWMF records were updated in this condition and throughout the permit.

IO.3. The sample analysis was updated.

Module II, General Facility Standards

II.B.3. The post-closure care period was clarified in the draft permit. BPPNA will continue for another ten years for the duration of this permit, and will be extended by the Director for the hazardous waste management unit, unlined surface impoundments, with waste remained in place in accordance with R315-264-117(a)(2)(ii) of Utah Administrative Code.

II.D. A notice to Director's project staff for the facility inspection was added.

II.H Financial assurance was updated.

Module III, Post-Closure Care and Use of Property

No substantial changes were made in Module III.

Module IV, Groundwater Detection Monitoring

IV.B.1. Monitoring Well Locations – Five new groundwater monitoring wells (GW-1 through 5) are being installed in August 2020 as the future detection compliance monitoring wells. Table 1, Figures 2 and 3, and all other affected changes including Appendix C of Attachment I will be updated after the five new wells are installed and surveyed. Please note that monitoring wells GW-1 through 5 will be located next to the TN wells 1 through 5 and WQ wells 1 through 5, respectively.

IV.B.3. The groundwater monitoring network and analysis were modified, five new monitoring wells will be installed. The post-closure care period was extended after 30 years in Module IV.

IV.C. The analytical methods were updated. Total metal analyses were added to the current permit. The full suite volatile organic compounds of EPA Method 8260D analytes will be provided.

IV.G. The statistical analysis methods were updated in Module IV.G. Monitoring Program and Data Evaluation.

IV.M. Monitoring data validation was added to the permit.

Module VI, Groundwater Corrective Action

No substantial changes were made in Module VI.

Attachment I, Post Closure Care and Monitoring Plan

The post closure care and monitoring plan were updated to reflect the modifications in the permit modules above.

Post-Closure Monitoring and Inspection Checklists, Appendix C of Attachment I, will be updated to include GW series wells after the new wells are installed and surveyed.