

MODULE VII ATTACHMENT 3 TEAD-S OD Unit Closure Plan

1.0 INTRODUCTION

This attachment provides closure and post-closure plans for the TEAD-S OD unit as required by Utah Admin. Code R315-264-110 through 120. This attachment is organized in the following sections:

- Closure Plan, and
- Financial Requirements.

2.0 CLOSURE PLAN: Utah Admin. Code R315-270-14(b)(13), R315-264-110 through R315-264-10

This section describes the procedures that will be used to perform closure of the TEAD-S OD unit. During the active life of the OD unit annual compliance sampling will be conducted per Module VII, Attachment 2. Periodic surface sweeps for munitions debris shall also be conducted during the active life of the OD unit. Upon site closure, remediation to industrial levels will be obtained. Post closure care will be conducted through a post closure permit and dig permit restrictions to ensure industrial use.

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

Closure of the TEAD-S OD is discussed in the following sections:

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

2.1 Content of the Closure Plan: Utah Admin. Code R315-264-112(b)

When the U.S. Army determines that final closure of the OD unit should commence, a detailed up-to-date closure plan shall be completed and submitted to the Director for review and approval. 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 shall include:

- A description of how the OD unit will be closed in accordance with the closure performance standard required by R315-264-111;
- A description of how final closure of the OD unit will be conducted;
- An estimate of the maximum inventory of hazardous waste that was ever on-site;
- Detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure, including, but not limited to, procedures for

cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of decontamination required to satisfy the closure performance standard; 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, risk-based industrial levels, to meet the requirements of R315-101.

2.2 Closure Performance Standard: Utah Admin. Code R315-264-111

Closure performance standards shall be addressed in the plan submitted prior to final closure. The closure standard will likely be based on soil screening levels for the industrial scenario found in Table 5-1 of Attachment 5, Closure Plan. Closure will ensure minimization of on-going maintenance and control exposure to human health and the environment. These standards shall include source clean-up of potential explosive constituents.

2.3 Schedule For Closure: Utah Admin. Code R315-264-112(b)(6)

No specific date for the OD unit closure has been scheduled. When it is determined that closure of the OD unit can begin, a detailed closure plan shall be submitted to the Director and shall include a schedule for closure. Closure activities shall 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 the Director.

2.4 Disposal Or Decontamination Of Equipment, Structures, And Soils: Utah Admin. Code R315-264-114

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

2.5 Post-Closure Plan: Utah Admin. Code R315-264-117 through 120, R315-264-110, R315-270-14(b)(13)

A post-closure plan shall be required because the Army does not intend to seek clean closure but closure in accordance with R315-101 for industrial use. Potential munition hazard may be present due to freeze/thaw and erosion. The property will remain in the custody of the Army.

2.6 Certification of Closure: Utah Admin. Code R315-264-115; R315-264-120

Within sixty (60) days of completion of closure, TEAD-S shall submit to the Director, by registered mail, certification that the OD unit has been closed in accordance with the approved closure plan. The certification shall be signed by the Installation Commanding Officer and an independent registered professional engineer. Documentation supporting the engineer's certification shall be furnished with the certification.

2.7 Survey Plat: Utah Admin. Code R315-264-116

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

3.0 FINANCIAL REQUIREMENTS: Utah Admin. Code R315-270-14(b)(15), R315-264-142

A closure cost estimate and financial assurance mechanism are not required for this facility because R315-264-140(c) exempts the Federal government from these requirements.