Dugway Proving Ground
Draft Permit Renewal
Fact Sheet

On April 30, 2015, Dugway Proving Ground (Dugway) submitted an application to the Division of Waste Management and Radiation Control to renew its hazardous waste permit. The current permit was issued September 25, 2005.

Dugway operates a Federal hazardous waste storage and treatment facility at Dugway, Utah which is located in Tooele County. The facility is located approximated 35 miles south of Exit 77 on Interstate 80.

The Division of Waste Management and Radiation Control 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 3, 2017 and will conclude on September 18, 2017, 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 6, 2017 in Room 122 of the Tooele Public Library, which is located at 128 West Vine Street, Tooele, Utah.

A fact sheet and the draft permit are 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

For the public's convenience, a copy of the fact sheet and draft permit is available online at:
http://www.hazardouswaste.utah.gov/Public/PublicHearingsandComment Periods.htm

Written comments will be accepted if received by 5:00 p.m. on September 18, 2017 and should be submitted to the address below. Comment can also be hand delivered to the Division address above as long as they are received by 5:00 p.m. on September 18, 2017.

Scott T. Anderson, 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 Dugway Proving Ground Draft 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 draft Dugway draft 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.

The Dugway facility is a permitted storage and treatment facility. Dugway may store RCRA hazardous waste, generated at Dugway, in their permitted Central Hazardous Waste Storage Facility (CHWSF). Dugway may treat both on-site and off-site generated RCRA hazardous waste, by thermal treatment, at the permitted Dugway Thermal Treatment Facility (DTTF). All waste stored and treated at Dugway is subsequently sent off-site to other facilities for further treatment and disposal.

The Draft Permit consists of six modules, sixty-eight attachments, seven analytical lab methods, two appendixes, and five forms. A summary 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 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. In compliance with Department of Defense physical security directives, several figures are not included for public distribution.

In addition, references to the Executive Secretary throughout the Permit have been changed to the Director.

Module 1, Standard Conditions

General editing to include updating references, formatting, acronyms, grammar and to ensure consistency with other Utah permits.

Module 2, General Facility Conditions

- General editing and to ensure consistency with other Utah permits.
- Section II.C.3. Minor update to reflect current agent-related waste streams meet conditions set forth in Attachment 1-10, CHWSF Quality Assurance Program Plan.

Module 3, Container Storage

Updates to references, formatting, acronyms, and grammar.

Module 4, RCRA Corrective Action Program

- General editing and to ensure consistency with other Utah permits.
- Updated Table 1 to contain only those sites that are active under corrective action. Included a reference to sites in post closure care.
- Clarified text in Table 2 indicating Areas of Concern (AOCs) met no further action (NFA) determination. Table includes reference to Condition IV.D.4 for the potential for additional investigation of AOCs upon base closure.
- Updated Table 3 to reflect current status of program and how new sites will be evaluated.

Module 5 Treatment of Energetic Wastes

General editing and to ensure consistency with other Utah permits, and removal of two burn pans.

Module 7 Post-Closure Conditions for Non-Notifier Waste Management Units

General editing and to ensure consistency with other Utah permits

Attachment 1-1 CHWSF Waste Analysis Plan

- General editing.
- Section 2.03. Removed reference to management of nickel cadmium batteries.
- Table 1. Changed charcoal filters Environmental Protection Agency (EPA) hazardous waste code from D007 to D011.
- Table 2. Changed reportable quantity value for battery acid (EPA waste code D002) to 100 lbs.
- Global updates when assigning EPA hazardous waste codes based on performing analytical testing and/or applying historical process and/or generator knowledge.
- Section 2.2.13.1. Removed EPA waste codes F002, F003, and F005.
- Table 4. Removed Corrosivity/pH and TCLP Lead (Pb) from typical analyses for waste fuels.
- Section 2.4.2. Updated reference.
- Table 8. Changed carbon ventilation filters EPA hazardous waste code from D007 to D011.

- Section 3.7.0. Removed P999 references.

Attachment 1-2 CHWSF Security
General editing.

Attachment 1-3 CHWSF Inspection Schedule
General editing.

Attachment 1-4 CHWSF Training Plan
General editing.

Attachment 1-5 CHWSF Facility Description
General editing.

Attachment 1-6 CHWSF Preparedness and Prevention Plan

General editing.

Attachment 1-7 CHWSF Contingency Plan

General editing.

Attachment 1-8 CHWSF Closure and Post-Closure Plan

General editing.

Attachment 1-9 CHWSF Container Management

General editing.

Attachment 1-10 CHWSF Quality Assurance Program Plan

- General editing.
- Section 2.1.0, Figure 1 was deleted because it is outdated.
- Section 2.2.3.1, 2.2.4.1 & 2.2.5.1, DPG Chemical Operations Branch Chief recommends deleting “Accurately and honestly” because they are not directly auditable.

- Section 3.2.4.1, was revised to more accurately reflect training documentation and its storage locations.
- Section 4.3.1, was revised to specifically identify the "DPG Calibrations Unit" and clarify the approach to tracking calibration.
- Section 6.4.1, was revised to clarify that wastes present only a potential for chemical exposure.
- Section 6.11.1, was revised to reflect DPG's increased stringency regarding temperature control before sample delivery.
- Section 9.5.1, Table headers were revised to better specify the statistic used and to correct a typo.
- Section 9.6.1, Table 7 Footnote c has been revised to propose determining soil MDLs as needed before performing soil analyses and then keeping the MDLs on file at DPG, because the lab has not had DPG soil samples coming in.
- Section 10.3.1, "Analytical data or data summary" are correctly described as "the analysis report and its accompanying narrative."
- Section 13.0 Acronyms and Definitions, the definition of DEP was updated and three unnecessary definitions were deleted.

Method CL002R Chemical Agents by Gas Chromatography with Flame-Photometric and/or Mass Selective Detection

- General editing.
- Section 1.0, chemical agent names were spelled out
- Section 5.2, two compounds in the list of reagents are not available as Reagent Grade. The wording has been revised to reflect this fact.
- Section 5.2, the MSD is not used in full-scan mode to report analytical results. Therefore, BFB is not used and has been deleted.
- Section 5.2 & 6.1, Use of the laboratory information management system (LIMS) to augment the laboratory notebook is recommended.
- Section 6.1.2, Point 6, the storage temperature requirement for solutions has been revised to align with CL-044R, Section 6.0.
- Section 6.1.3 & 6.1.4, Points 5 thru 8 were revised to align with Section 6.1.2.

"Section 7.1.1, Table 5 Footnote c has been revised to propose determining soil MDLs as needed before performing soil analyses and then keeping the MDLs on file at DPG, because the lab has not had DPG soil samples coming in. This proposed change also appears in QAPP Table 7."

Method CL022R Sampling Solid Wastes with DAAMS

General editing.

Method CL044R Chemical Agent Monitoring (GA, GB, GD, GF, HD, Lewisite, HN1, HN3, and VX) Using Field MINICAMS®

General editing.
Section 6.2, the non-applicable section was deleted

Method CL052R Chemical Agents in DAAMS by Gas Chromatography

General editing.

Method CL055R Sampling Liquid Waste

General editing.

Method CL071R Dry Weight for Solids
General editing.
Section 1.0. reference provided.

Attachment 3-1 DTTF Waste Analysis Plan

- General editing.
- Updated web references.

Attachment 3-2 DTTF Security Plan
General editing.

Attachment 3-3 DTTF Inspection Schedule
General editing

Attachment 3-4 DTTF Training Plan
General editing.

Attachment 3-5 DTTF Facility Description
General editing

Attachment 3-6 DTTF Preparedness and Prevention Plan
General editing.

Attachment 3-7 DTTF Contingency Plan
General editing.

Attachment 3-8 DTTF Closure Plan

- General editing.

Attachment 3-9 DTTF Environmental Performance Standards

- General editing.
- Modified Section 3.7 and added Section 3.10 to address groundwater sampling. Groundwater sampling was previously addressed in the Carr GMA; however, as the DTTF is now a permitted site, funds for the GMA may not be used. The Carr GMA originally had sampling for the DTTF once every five years. This sampling frequency has been retained with the caveat that sampling is required only of the DTTF is used for open detonation. This clarification was applied as the risk assessments have shown there is no migration of constituents to groundwater from conducting open burning operations. Only open detonations could leave residual contamination that could potentially impact groundwater. As GMA change request form has been submitted as a standalone document transferring the groundwater monitoring requirement for the DTTF to the permit.

Module 7 Appendix A

- General editing.
- Updating language to reflect current state of corrective action program and how new sites will be addressed.

Module 7 Appendix B

- General editing.
- Updated web references.

Module 7 General Facility Description

- General editing.
- Added Table 1 summarizing sites in post closure and special tracking sites as well as summary of documentation and State approvals.

Module 7 Post Closure Attachments 2 through 49

General Editing and to ensure consistency with other Utah permits.

HWMU 39 was determined to not require groundwater monitoring under the Ditto Groundwater Management Area (GMA). The post closure plan was finalized prior to the finalization of the GMA. As metals and volatiles were detected in groundwater at concentrations above risk-based levels, a special tracking condition is needed to ensure no groundwater wells are established in or around the site. Tracking notes were added to the plan that will get captured as a special tracking

item on the annual inspection form; compliance of this condition is also met through the Dig Permit process.

SWMU 180 was determined to not require groundwater monitoring under the Carr GMA. The post closure plan was finalized prior to the finalization of the GMA. However, a groundwater plume emanating from SWMU 61 is present beneath SWMU 180. The SWMU 61 plume contains volatile organic compounds (VOCs) at levels above ingestion and inhalation risk. Special tracking at SWMU 180 is required through the Dig Permit process to ensure no wells are drilled at SWMU 180 into the SWMU 61 plume and no activities occur over the SWMU 61 plume that could result in inhalation exposures (vapor intrusion).