

Pasco Sanitary Landfill NPL Site

Zone A Removal Action

Engineering Design Report

Appendix C

Waste Handling, Characterization,

and Disposal Plan

DRAFT FINAL

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List of Acronyms and Abbreviations

Acronym/ Abbreviation	Definition
CAMU	Corrective Action Management Unit
CAP	<i>Cleanup Action Plan—Pasco Landfill NPL Site</i>
CMA	Container Management Area
COC	Contaminant of concern
CUL	Cleanup level
Ecology	Washington State Department of Ecology
EDR	Zone A Removal Action Engineering Design Report
EO	Enforcement Order No. DE 16899
GC	General Contractor
HASP	Health and Safety Plan
HazCat	Hazard Categorization
ICR	Ignitability, corrosivity, or reactivity
IDEQ	Idaho Department of Environmental Quality
IDW	Investigation-derived waste
IWAG	Industrial Waste Area Generators Group III
LDR	Land Disposal Restriction
LNAPL	Light non-aqueous-phase liquid
MSW	Municipal solid waste
MTCA	Model Toxics Control Act
NORM	Naturally occurring radioactive material
NPL	National Priorities List
ODEQ	Oregon Department of Environmental Quality
PHC	Principal Hazardous Constituent
PLP	Potentially liable person
RCRA	Resource Conservation and Recovery Act
Site	Pasco Sanitary Landfill National Priorities List Site
SOW	Scope of Work and Schedule
SVE	Soil vapor extraction

Acronym/ Abbreviation	Definition
SVOC	Semivolatile organic compound
TENORM	Technologically enhanced naturally occurring radioactive material
TSDf	Treatment, storage, and disposal facility
TU	Treatment Unit
USEPA	U.S. Environmental Protection Agency
UTS	Universal Treatment Standards
VOC	Volatile organic compound
Waste Plan	Waste Handling, Characterization, and Disposal Plan
ZCS	Zircon casting sands
Zone A	Industrial Waste Area Zone A

1.0 Introduction

This Waste Handling, Characterization, and Disposal Plan (Waste Plan) for the Industrial Waste Area Zone A (Zone A) Removal Action at the Pasco Sanitary Landfill National Priorities List (NPL) Site (Site) describes the characterization and profiling for wastes to be excavated and removed from Zone A. This Waste Plan has been prepared for the Washington State Department of Ecology (Ecology) on behalf of the Industrial Waste Area Generators Group III (IWAG) to fulfill the requirements of the *Cleanup Action Plan—Pasco Landfill NPL Site (CAP)* and associated Scope of Work and Schedule (SOW) for the Site (Ecology 2019a, 2019b).

The Zone A Removal Action is being conducted under Enforcement Order No. DE 16899 (EO) issued by the Ecology to potentially liable persons (PLPs) that are members of the IWAG,¹ the Landfill Group, and other PLPs involved at the Site. The EO was issued to PLPs on November 8, 2019. The EO includes a CAP and associated SOW. The EO, CAP, and SOW describe cleanup actions required for all disposal areas at the Site. This Waste Plan is for the Industrial Waste Area referred to as Zone A. The Zone A Removal Action is presented in Task A in the SOW. Task A is subdivided into Tasks A.1 through A.8.

The Waste Plan is part of Task A.1 Preparation of a Zone A Removal Action Engineering Design Report (EDR) as Subtask C Waste Characterization, Handling, Staging, and Disposal.

1.1 PURPOSE

This Waste Plan has been prepared to address the requirements set forth in the SOW. The objective of the Waste Plan is to safely relocate removed drums, drummed waste, pooled free liquids, and readily separable (by mechanical means) potentially combustible material such as (but not limited to) tires, tree stumps, scrap wood, cardboard/paper, or plastic from Zone A to the appropriate waste disposal facility (or facilities) permitted to accept the waste.

In addition, this plan has been prepared to support Ecology approval of a Corrective Action Management Unit (CAMU)-eligible determination for Zone A wastes for offsite disposal. This request is being submitted in accordance with WAC 173-303-646920, “Disposal of CAMU-eligible wastes into permitted hazardous waste landfills located outside Washington,” and 40 CFR 264.555, “Disposal of CAMU-eligible wastes in permitted hazardous waste landfills.”

1.2 ORGANIZATION

This Waste Plan is divided into the following main sections:

- **Section 1.0—Introduction.** Describes the objectives and organization of the Waste Plan.

¹ The members of IWAG are PPG-Architectural Coatings Canada Inc.; Blount, Inc.; The Boeing Company; Crown Beverage Packaging, LLC; Daimler Trucks North America LLC; Georgia-Pacific, LLC; Goodrich Corporation on behalf of Kalama Specialty Chemicals, Inc.; Intalco Aluminum Corporation; 3M Company; PACCAR Inc.; PCC Structurals, Inc.; Pharmacia LLC; Simpson Timber Company; Union Oil Company of California; and Weyerhaeuser NR Company.

- **Section 2.0—CAMU Eligibility Procedural and Administrative Requirements.** Presents information in support of Zone A waste being designated as CAMU-eligible for disposal at an offsite permitted hazardous waste treatment, storage, and disposal facility (TSDF).
- **Section 3.0—Waste Profiling and Disposal Approach.** Describes the preliminary waste profiles and how profiles will be modified for offsite disposal.
- **Section 4.0—Waste Material Handling and Management.** Details the onsite handling, stockpiling, and temporary accumulation of wastes and debris. Describes the waste characterization (onsite and offsite) and analysis procedures that will be used to properly designate the waste for compatibility, consolidation, potential batching, and disposal.
- **Section 5.0—Waste Transportation and Disposal.** Describes the general process of preparing the manifest and the logistics required to secure the waste for transportation and offsite disposal.
- **Section 6.0—Zone A Record Keeping and Disposal Documentation.** Describes the requirements for documentation of the Waste Plan.
- **Section 7.0—References.** Includes all reference material cited in this document.

2.0 CAMU Eligibility Procedural and Administrative Requirements

CAMUs are special units created under the Resource Conservation and Recovery Act (RCRA) to facilitate treatment, storage, and disposal of hazardous wastes managed for implementing cleanup and to remove the disincentives to cleanup created through the application of RCRA.

The IWAG is requesting Ecology approval of a CAMU-eligible determination for Zone A wastes. All wastes will be disposed of at offsite TSDFs and if treatment is necessary, treatment will occur at the TSDF and not at Zone A. TSDFs must be a RCRA-permitted, not interim status, dangerous/hazardous waste landfill; meet the WAC 173-303-665 requirements for new landfills; and be authorized to accept CAMU-eligible wastes. Prior to offsite disposal, waste will be accumulated onsite in accordance with the requirements of large quantity generators under WAC 173-303-170(2)(a)(iii) (independent requirements of a large quantity generator), -170(2)(b)(iii) (large quantity generator conditions for exemption), and -200 (large quantity generator onsite waste accumulation requirements). Waste will not be treated or placed on site.

This request is being submitted in accordance with WAC 173-303-646920, "Disposal of CAMU-eligible wastes into permitted hazardous waste landfills located outside Washington," and 40 CFR 264.555, "Disposal of CAMU-eligible wastes in permitted hazardous waste landfills."

Ecology may approve disposal of CAMU-eligible waste at offsite permitted hazardous waste TSDFs without the waste being subject to Land Disposal Restriction (LDR) Universal Treatment Standards (UTS) under WAC 173-303-646910 and 40 CFR 264.555, if:

- (1) the landfill is authorized to accept CAMU-eligible wastes pursuant to 40 CFR 264.555 or pursuant to U.S. Environmental Protection Agency (USEPA)-approved state regulations implementing 40 CFR 264.555; and
- (2) the other WAC 173-303-646910(1)(a), (b), (2), (3), and (6) regulatory requirements are met for applicability and treatment standards, application requirements, public comment requirements, and compliance with federal regulations.

2.1 APPLICABILITY AND TREATMENT REQUIREMENTS

This section has been prepared to address the eligibility of and treatment requirements described in WAC 173-303-646910(1)(a), (b), and (2). Section 2.1.1 includes information to allow Ecology to make a determination that Zone A wastes are eligible for off-site disposal as CAMU waste; Section 2.1.2 describes the Zone A Removal Action; Section 2.1.3 identifies principal hazardous constituents (PHCs) in Zone A wastes; and Section 2.1.4 describes treatment criteria for PHCs, as well as offsite TSDF acceptance criteria for CAMU-eligible treatment and disposal.

Wastes that do not meet the TSDF acceptance criteria for CAMU-eligible wastes will be designated in accordance with the Washington dangerous waste regulation WAC-173-303-070 and RCRA regulations 40 CFR 261, "Identification and Listing of Hazardous Waste."

2.1.1 Eligibility of Zone A Wastes

CAMU-eligible wastes are defined at WAC 173-303-64650(3)(a) to include all hazardous and associated solid wastes and all media (including groundwater, surface water, soils, and sediments) and debris that contain listed hazardous wastes or that exhibit hazardous characteristics and are managed for implementing cleanup, except for as-generated wastes from ongoing industrial production operations or wastes that were disposed of or managed illegally.

In accordance with WAC 173-303-646910(2) the person seeking approval (in this case, the IWAG) must provide sufficient information to enable the department to approve placement of CAMU-eligible waste into an offsite TSDf permitted to accept CAMU-eligible wastes. Information required for approval is listed at WAC 173-303-64660(2)(a-c) for a CAMU-eligible waste application:

- (a) “The origin of the waste and how it was subsequently managed (including a description of the timing and circumstances surrounding the disposal and/or release);
- (b) Whether the waste was listed or identified as dangerous at the time of disposal and/or release;
- (c) Whether the disposal and/or release of the waste occurred before or after the land disposal requirements of 40 C.F.R. part 268, which are incorporated by reference at WAC 173-303-140(2)(a), or, if the waste is a state-only dangerous waste, the land disposal restrictions of WAC 173-303-140(2)(b), were in effect for the waste listing, characteristic, or criterion.”

The Zone A limits are shown on Figure C.1. The known development history of the Site, including the best available information regarding Zone A wastes, is documented in the 1993 Final Draft Phase 1 Remedial Investigation and the 2017 Draft Final Focused Feasibility Study (Burlington Environmental 1993; Anchor QEA et al. 2017). Because wastes were placed before the RCRA went into effect in 1976, wastes were not listed or identified as dangerous at the time of disposal. Approximately 35,000 drums of industrial waste were placed in Zone A between April 1972 and December 1974. Laboratory analysis of the actual contents of the drummed wastes are not available because it was not a facility nor state regulatory requirement at that time. The characteristics of the waste contained in or previously contained in drums/containers is purported to include wastes in the following table:

Waste	Approximate Percentage of Drums/Containers	Drum/Container Count ⁽¹⁾	
		Inventory A	Inventory B
Paint wastes	65 to 68	21,654	24,200
Metal casting waste ⁽²⁾	21 to 25	6,894	8,774
Empty pesticide containers	3	1,045	863
Wood treatment wastes	3	1,100	--

Waste	Approximate Percentage of Drums/Containers	Drum/Container Count ⁽¹⁾	
		Inventory A	Inventory B
Metal finishing waste	1 to 5	1,668	304
Acid waste	1.5	--	544
Oily sludge/waste	1	433	433
Wood preservation wastes	1	238	--
Etching solution	0.5	160	--
Tar aromatic	0.5	248	160
Insecticide/pesticide	0.5	191	425
Cadmium waste	<0.05	--	11
Chemistry lab reagents/ Miscellaneous lab chemicals	<0.005	1/29 small containers	--

Notes:

- Not available.
- 1 Drum/Container Count as presented in the 1993 Final Draft Phase 1 Remedial Investigation, which attributes the source of inventory A to Resource Recovery, Inc.'s Monthly Reports to Ecology and October 19, 1973 Summary; and the source of Inventory B to Hand-Written Summary Sheets, Undated (Burlington 1993).
- 2 Metal casting waste was referred to as metal cleaning waste in Inventory A.

Initially, drums were disposed of in a trench formerly used for burning municipal solid waste (MSW). In fall 1972, the operators began stacking drums rather than disposing of them in the former burn trench. The exact number of drums disposed in the former burn trench versus the stacked drum area is not precisely known. However, approximately 80 percent of the drums arrived after 1972 and, therefore, would have been stacked in Zone A.

Drums were initially placed randomly until about mid-1972, followed by placement of stacked drums until mid-1974. Photographs suggest that drums in the randomly placed drum area may not be intact due to poor handling protocols prior to the beginning of the stacked drum placement. Stacked drums were placed four high and were periodically covered with native soils.

The Zone A cell was placed on reworked native soils, some of which included burned MSW left over from pre-Zone A activities. No leachate collection or control system was constructed beneath the Zone A cell. Engineering controls in place to address potential vapor exposure at Zone A consist of a landfill cap with a high-density polyethylene geomembrane coupled with an underlying geosynthetic clay liner and a soil vapor extraction (SVE) system with a radius of capture that extends beyond the geomembrane.

Current data indicate that certain volatile contaminants of concern (COCs) within Zone A are migrating in the vapor phase through soil to groundwater. COCs enter groundwater through vapor-phase to aqueous-phase partitioning, as well as aqueous-phase transport.

Ongoing sitewide groundwater monitoring indicates that concentrations of volatile organic compounds (VOCs) in wells at the Site have continued to decrease overall since SVE system upgrades began operation in 2011. The indicator hazardous substance concentrations observed in groundwater at the Site are generally less than Site cleanup levels (CULs) and are near or below method reporting limits throughout the majority of the Site. Low level concentrations of compounds other than VOCs, such as semivolatile organic compounds (SVOCs), including polycyclic aromatic hydrocarbons, have also been detected in groundwater.

Light non-aqueous-phase liquid (LNAPL) is present at the groundwater table surface within one well, MW-52S, located within the interior of Zone A. Since August 2018, an LNAPL-absorbent sock has been deployed in MW-52S, and replacement socks continue to absorb the LNAPL. Due to limited well coverage within the footprint of Zone A, the full extent of LNAPL within Zone A is not known. LNAPL has not been observed outside of Zone A, and detected concentrations of COCs downgradient of Zone A have been less than Site CULs.

2.1.2 Description of Zone A Removal Action

The planned construction activities for the Zone A Removal Action are summarized in this section, with additional details provided in the EDR.

The drum removal action will take place within Zone A, and adjacent areas of the property will be used for access and staging in support of the removal activities, as indicated on Figure C.1. Temporary access roads will be constructed into Zone A and between the various staging and support zones that the General Contractor (GC) will use to execute the work, maximizing use of existing access roads. Treatment Unit (TU) and onsite CAMU regulations are not applicable; CAMU-eligible wastes will not be stored or treated onsite and, therefore, are not TUs. Dangerous waste generated during drum removal activities will be accumulated and managed onsite for no more than 90 days, consistent with requirements at WAC 173-303-200.

The scope of work for the Zone A Removal Action generally includes the following elements:

1. Mobilization of equipment and crews to the job site, including constructing site staging and access areas.
2. Removal of the Zone A cover system components above the existing geomembrane and geosynthetic clay liner. The anticipated lateral extent of excavation is shown in Figure C.1.
3. Systematic removal of the existing geomembrane and geosynthetic clay liner, which serves as a vapor barrier for Zone A.
4. Removal of the engineered soil fill located below the existing geomembrane and within the lateral limits of excavation.

5. Construction of a working platform consisting of 8-mil polyethylene sheeting overlain by geogrid and 1 foot of compacted gravel will then be placed in order to provide a stable foundation for the temporary structure, and to limit vapor emissions from the excavation, aid in odor control, and restrict infiltration of precipitation into areas of Zone A outside the temporary structure.
6. Excavation of Zone A and management of contaminated materials. This work will include the following elements:
 - A. Installation of a temporary moveable engineered structure with air quality controls to enclose removal action excavations. The structure will be installed in the northwest corner of Zone A then sequentially relocated to five additional positions as the excavation progresses.
 - B. Excavation in support of the Zone A Removal Action will occur inside the temporary structure and will include the following:
 - i. Removal, inspection, characterization, sampling, segregation, and packaging of drums, drummed materials, pooled free liquids, sludges, and material originating from drums for safe onsite management and transportation to waste handling and container management areas.
 - ii. Removal of readily separable (by mechanical means) potentially combustible material, segregation, loading, and transportation to waste handling and container management areas.
 - iii. Excavation and management of contaminated media and mixed debris, as necessary to access drums and material designated for transportation to offsite TSDFs. These contaminated media and mixed debris are to be returned to/remain in Zone A.
 - iv. Placement and compaction of excavated contaminated media and mixed debris that do not require removal for offsite treatment and/or disposal back into the Zone A excavation.
 - C. Activities currently planned to take place outside the temporary structure include stockpiling and management of materials that are to be returned to Zone A; temporary waste handling and container management in designated areas; and loading and transport of wastes to approved offsite TSDFs.
7. Backfill of the excavation area with stockpiled engineered soil fill to interim grades including grading and compaction.
8. Site restoration. This work includes the following:
 - A. Construction of temporary low-permeability cover (anticipated to consist of asphalt or concrete) to prepare Zone A for subsequent in situ thermal treatment.
 - B. Potential application of additional suitable non-impacted soil material over adjacent MSW disposal areas (mixed debris waste disposal area, Balefill Area, and/or Inert Waste Disposal Area) to satisfy minimum cover system requirements.
9. Characterization of remaining Zone A materials and underlying soils. This work will occur prior to in situ treatment.

10. Demobilization of all equipment. This work will include appropriate decontamination.

The Zone A Removal Action is to be conducted over an approximate 14- to 16-month period, anticipated to begin in fall 2020.

2.1.3 Identification of Principal Hazardous Constituents

PHCs are defined at WAC 173-303-64660(3)(d)(i) as those constituents that Ecology determines to pose a risk to human health and the environment substantially greater than the CULs or cleanup goals at the site. In general, Ecology will designate the following as PHCs:

- Carcinogens that pose a direct risk through inhalation or ingestion at the site at or greater than 1×10^{-3} .
- Noncarcinogens that pose a direct risk from inhalation or ingestion at the site an order of magnitude (10x) or greater above their reference dose.
- Other constituents that pose risk through groundwater migration or other exposure that are substantially higher than the site cleanup levels. When making such a designation, the department may consider such factors as constituent concentrations, and fate and transport characteristics under site conditions.

As described in Section 2.1.1, the drums originally contained a variety of industrial wastes. Assuming that the original drum inventory is accurate, the majority of site wastes (up to 65 percent) are anticipated to be paint wastes and so will likely contain VOCs, which have high mobility in the environment, and for VOCs that are non-chlorinated, have low flashpoints and may be ignitable if found at high concentrations. Other wastes include metal casting sands (up to 24 percent) and far lesser amounts of other waste types (e.g., acid wastes, oily wastes, pesticides, tar aromatics, and empty containers).

COCs that have been detected in the soil beneath Zone A suggest that Zone A wastes that were released to the environment are primarily non-chlorinated VOCs (e.g., toluene, methyl ethyl ketone, and xylene), with varying detections of SVOCs, pesticides, herbicides, polychlorinated biphenyls, polycyclic aromatic hydrocarbons, and metals. Detected COCs in groundwater within Zone A and LNAPL within Zone A source well MW-52S include various aromatic and aliphatic hydrocarbons, VOCs, and SVOCs (naphthalenes and chlorobenzenes). Table C.1 presents maximum detected concentrations in Zone A LNAPL and soil samples taken beneath Zone A. Using these data, it is possible to compare the concentrations found to regulatory levels for RCRA toxicity D-codes, RCRA LDR UTS, and PHC screening levels derived from Model Toxics Control Act (MTCA) Method C values as described below. This comparison shows that in the absence of a CAMU eligibility determination for Zone A, wastes would likely be profiled as hazardous waste under RCRA Subtitle C and require incineration to meet LDR UTS.

Although CAMU-eligible wastes would be exempt from LDR requirements, any PHC that Ecology identifies in the site cleanup wastes must be treated to standards set forth at WAC 173-303-64660(3)(d)(iv) or adjusted treatment standards at WAC 173-303-64660(3)(d)(v) for a CAMU-eligible waste before land disposal. Generally, this will include treatment to remove ignitability,

corrosivity, or reactivity (ICR) characteristics, and any liquid wastes must be solidified before being placed within an offsite permitted hazardous waste TSDF. Ecology may require additional treatment for organic and inorganic PHCs depending upon the long-term protection offered by the engineering design of the offsite permitted hazardous waste TSDF and related engineering controls; or where the waste or residuals are of very low mobility; or where cost-effective treatment has been used.

A screening level approach has been developed to identify whether organic and inorganic COCs found in Zone A waste that has been released to the environment meet the definition of PHCs. For the Zone A Removal Action, PHCs screening levels are based upon MTCA Method C CULs that have been adjusted for risk, in keeping with the above cited regulations. All of the assumed and known hazards within the waste stream that would otherwise be used to determine toxicity D codes as well as UTS under identified under 40 CFR 268.48 and WAC 173-303 were identified as potential PHCs. Table C.1 shows the screening levels developed for PHCs in comparison to available Zone A analytical data, including maximum detections in Zone A soil and LNAPL. The LNAPL detected at well MW-52S likely represents a mixed blend of contents sourced from many drums that have released their content over time, and therefore, additional PHCs may be designated during the drum characterization process.

The screening approach shows that Zone A LNAPL exhibits the characteristic of ignitability, and one VOC (1,2,3-trichloropropane) is present at a level typically used to designate PHCs. Other organic and inorganic chemical constituents are present in soil and LNAPL, but not at levels where they would be considered individual PHCs. It is possible that some drummed waste may have higher levels of these constituents than what has been detected in site soils and LNAPL. Regardless, rather than evaluating individual constituents as PHCs, the characteristics of ICR could be used largely to determine requirements for treatment and disposal. Based on the ignitability characteristic, LNAPL would require treatment by incineration for disposal. Other liquid wastes and sludges that do not exhibit ICR characteristics could be treated through solidification to limit the mobility of VOCs. This approach to disposal of CAMU-eligible waste relies on the disposal facility acceptance criteria, the protectiveness of the landfill into which wastes are being placed, and steps that will be taken to limit mobility (e.g., solidification of liquids). Specific treatment and TSDF acceptance requirements for CAMU waste are described in Section 2.1.4.

2.1.4 Treatment and Acceptance Criteria for Zone A Wastes at Offsite TSDF

The IWAG has identified two permitted Subtitle C hazardous waste TSDFs that are authorized to accept CAMU-eligible wastes:

- Waste Management's Chemical Waste Management facility in Arlington, Oregon (herein referred to as WM Arlington)
- US Ecology's facility in Grand View, Idaho (herein referred to as USEI Grand View)

Although CAMU-eligible wastes are exempt from LDR requirements, PHCs that Ecology identifies in the site cleanup wastes must be treated to standards for a CAMU-eligible waste as specified in

WAC 173-303-64660(3)(d)(iv), or treatment standards adjusted in accordance with WAC 173-303-64660(3)(d)(v)(A)-(B)(C), or (E)(I), or (E)(II). The IWAG has coordinated with the offsite TSDFs to propose treatment and acceptance criteria for Zone A wastes. Adjusted treatment standards are being requested in accordance with WAC 173-303-64660(3)(d)(v)(E)(I) and (II), and a corresponding federal regulation in 40 CFR 264.552(e)(4)(v)(E)(1), (2), and (5). The proposed treatment standards for CAMU-eligible waste are justified as follows:

- The offsite permitted hazardous waste TSDF meets or exceed rigorous liner and leachate collection requirements for new land disposal units at WAC 173-303-665(2)(h-j).
- The offsite permitted hazardous waste TSDF will offer considerably more protection than the current Zone A configuration, which does not include a leachate collection or control system.
- The quantity of materials targeted for removal from Zone A is approximately 14,000 cubic yards, which is a small volume in comparison to the size and capacity of the offsite permitted hazardous waste TSDFs into which the wastes will be placed.
- Treatment will be performed to reduce contaminant mobility (e.g., through solidification of liquids and sludges).
- Treatment will be performed to eliminate hazardous characteristics that could damage the integrity of the offsite TSDF containment system (e.g., deactivating corrosive wastes).
- Waste that does not meet the TSDF acceptance criteria will be profiled and disposed of under RCRA to LDR standards, or the most stringent applicable standards.

A portion of the wastes may not be amenable to treatment and disposal at an offsite permitted hazardous waste TSDF, based on the treatment capabilities and disposal requirements of the TSDFs. These wastes would instead be managed for offsite disposal under RCRA to LDR standards, or the most stringent applicable standards. Zone A wastes that would not be disposed of at an offsite permitted hazardous waste TSDF would include the following:

- Zone A wastes that exhibit the hazardous waste D001 characteristic of ignitability (e.g., a subset of paint wastes) or labpacked wastes, which would require treatment through incineration. Labpacks and liquid wastes with the RCRA hazardous characteristics of ignitability will not be disposed of under CAMU and will be profiled and disposed of as RCRA hazardous waste in accordance with LDR standards. Wastes in this category could still be shipped to WM Arlington or USEI Grand View as RCRA hazardous wastes, where they would be stored at the offsite TSDF and then transferred to an incineration facility under new manifests for final treatment and disposal.
- Any other waste that is restricted based on landfill permits or acceptance criteria (e.g., naturally occurring radioactive materials [NORM], if encountered).

Wastes that meet the permitted hazardous waste TSDF acceptance criteria will be treated by the offsite TSDF accepting the waste, if required, prior to disposal in the offsite permitted hazardous

waste TSDF. The proposed treatment and acceptance standards for CAMU-eligible wastes are as follows:

- Non-ICR liquid wastes and sludges will be solidified at the offsite TSDF prior to disposal in the offsite permitted hazardous waste TSDF. Solidification will significantly reduce the toxicity or mobility of any organic or inorganic PHCs in the waste, minimizing the short-term and long-term risk posed by the waste, including the risk at the remediation site.
- Zone A wastes that exhibit the hazardous waste D002 characteristic of corrosivity (e.g., acid waste drums) will be neutralized at the offsite TSDF, which substantially meets the treatment requirements for PHCs. Following neutralization, waste will be landfilled in the offsite permitted hazardous waste TSDF.
- Wastes with the RCRA hazardous characteristics of reactivity will be deactivated at the offsite TSDF, which substantially meets the treatment requirements for PHCs.² Following deactivation, waste will be landfilled in the offsite permitted hazardous waste TSDF.
- Zircon casting sands (ZCS) are known to contain NORM and may be alkaline. Drums identified as casting waste (ZCS drums) are not anticipated to be RCRA hazardous (D002 designation typically does not apply to solid wastes)³ and will be direct landfilled at an offsite TSDF permitted to take NORM and technologically enhanced naturally occurring radioactive material (TENORM)⁴ wastes.
- Solid and semisolid waste not in the categories referenced above that pass the paint filter test, which may include drums, fragments of drums, and materials that would be classified as “debris” and “hazardous debris” as defined respectively at 40 CFR 268.2(g) and (h), will be direct landfilled as an offsite permitted hazardous waste TSDF.

Additional information describing the regulatory compliance and waste profiling process is described in Section 3.0.

2.2 PROCEDURAL AND ADMINISTRATIVE REQUIREMENTS

CAMU-eligible waste from Zone A will be sent to WM Arlington or USEI Grand View. TSDF permits for both landfills indicating their CAMU eligibility status and waste acceptance criteria are provided in Attachment C.1.

Under WAC 173-303-646910(3) and consistent with WAC 173-303-64660(6), Ecology must provide public notice and a reasonable opportunity for public comment before approving CAMU-eligible waste for placement in an offsite permitted hazardous waste TSDF that is consistent with

² Zone A wastes are not anticipated to include D003 reactive waste but would be identified by the Hazard Categorization (HazCat) process if encountered.

³ Depending on the results of HazCat process, the ZCS drums could be designated as Washington State corrosive solid waste.

⁴ ZCS were not concentrated or enhanced during the parts casting process and, therefore, may not meet the definition of TENORM.

the public notice and comment requirement in WAC 173-303-64660(6). Such a notice will include the rationale for any proposed adjustments under WAC 173-303-64660(3)(d)(v) to the treatment standards described in subsection WAC 173-303-64660(3)(d)(iv). IWAG has coordinated with the offsite TSDFs to propose treatment and acceptance criteria for Zone A wastes at the offsite permitted hazardous waste TSDFs at WM Arlington or USEI Grand View. IWAG requested adjusted treatment standards in accordance with WAC 173-303-64660(3)(d)(v)(E)(I) and (II), and a corresponding federal regulation in 40 CFR 264.552(e)(4)(v)(E)(1), (2), and (5). Ecology approval to place CAMU-eligible waste in an offsite permitted hazardous waste TSDF is specific to a single remediation or Pasco Landfill Zone A.

Under WAC 173-303-646910(5)(a-f), CAMU-eligible waste may not be placed in an offsite landfill authorized to receive CAMU-eligible waste in accordance with WAC 173-303-646910(4) until the following conditions have been met:

- The landfill operator notifies the state agency (Idaho Department of Environmental Quality [IDEQ] or Oregon Department of Environmental Quality [ODEQ]) and persons on the facility mailing list of the intent to receive CAMU-eligible waste; the notice must identify the source of the remediation waste, PHCs in the waste, and the treatment requirements.
- Persons on the landfill facility mailing list may provide comments, including objections to the receipt of the CAMU-eligible waste, to the state agency within 15 days of notification. Other members of the public also will be provided an opportunity to provide input.
- IDEQ or ODEQ may object to the placement of the CAMU-eligible waste in the landfill within 30 days of notification; IDEQ or ODEQ may extend the review period an additional 30 days because of public concerns or insufficient information.
- CAMU-eligible wastes may not be placed in the landfill until IDEQ or ODEQ has notified the landfill owner/operator that they do not object to its placement.
- If IDEQ or ODEQ does not notify the landfill owner/operator that they have chosen not to object, the facility may not receive the waste, until objection has been resolved, or the landfill owner/operator obtains a permit modification from IDEQ or ODEQ specifically authorizing receipt of the waste.
- As part of the permit modification in accordance with WAC 173-303-646910(4), IDEQ or ODEQ may modify, reduce, or eliminate notification requirements of WAC 173-303-646910(5)(f) as they apply to specific categories of CAMU-eligible waste, based on minimal risk.

3.0 Waste Profiling and Disposal Approach

3.1 DESIGNATION AND PROFILING OF WASTE

The following protocols will be used to ensure that waste is profiled correctly, either as eligible for disposal in an offsite permitted hazardous waste TSDF, or if not CAMU-eligible, designated as dangerous waste in accordance with the procedures of WAC 173-303-070 and treated and disposed of at an offsite TSDF in accordance with the most stringent applicable federal and state requirements.

- CAMU eligibility procedural and administrative requirements are discussed in Section 2.0.
- For both liquid and non-liquid waste, characterization will focus on ICR hazardous waste characteristics, as determined by HazCat. Figure C.2 depicts the drum waste characterization decision points. These decision points were developed based on the characteristics and constituents previously detected in site soils, as well as information obtained from drum inventories.
- Waste will be assigned to a reference profile which have been developed for CAMU-eligible waste, as well as waste that would be considered non-CAMU-eligible (expected to be primarily liquid wastes that are ignitable). Table C.2 describes atmospheric, visual, and HazCat methods to identify whether waste conforms to a reference profile or would be considered non-conforming.
- Laboratory analytical testing will be conducted based on the reference profile, using USEPA SW-846 test methods and procedures. Analytical testing is expected to be performed at a frequency of 1 per every 16 to 20 similarly grouped drums, or every roll-off, with higher frequencies at the beginning of the project and lesser frequencies as the work progresses, assuming similar waste types are encountered. CAMU-eligible waste will be subject to lesser laboratory analytical testing for waste profiling based on discussion with both offsite landfills. Table C.3 describes the anticipated testing requirements by reference profile.
- Drums that do not contain liquids and are deteriorated or damaged to the extent that they cannot be handled intact, including drum remnants, will be placed in roll-off bins and managed for offsite disposal as CAMU-eligible bulk drum waste.
- Similarly grouped intact drums may be bulked together for disposal, depending upon the results of waste compatibility testing, other waste characterization results, and site constraints.
- Based on records maintained by the Site owner/operator, it is estimated that approximately 9,000 drums of ZCS were placed into Zone A. ZCS are also known to be highly alkaline and NORM. If other radioactive materials are found, work will stop until the conditions can be properly assessed. If NORM or other very low-level radioactive materials are found in waste streams other than the ZCS, they will be handled in the

same manner as the casting sands and will be segregated and accumulated on site until the contents are characterized and a disposal option is approved.

3.2 ASSIGNMENT OF REFERENCE PROFILES AND PROCESS FOR MODIFYING WASTE PROFILES CODES

Reference profiles have been developed for Zone A wastes based on anticipated waste types and coordination with TSDFs. Draft reference waste profiles are provided in Attachment C.1 and described in Table C.3 and Figure C.2. Revised reference profiles will be prepared following Ecology approval of CAMU eligibility and subsequent coordination with TSDFs.

The testing approach will use onsite screening level tests (HazCat) and visual observations to assign a reference waste profile and determine which additional laboratory analytical tests are warranted. The reference profiles are intended to broadly identify the likely scenarios for how wastes will need to be treated and disposed of in accordance with the selected TSDF's acceptance criteria and permit conditions. Waste that does not fit a CAMU-eligible reference profile will be managed under applicable RCRA and state regulations. Should additional testing be required to characterize waste, it will be in compliance with WAC 173-303 and 40 CFR Parts 261 and 268. Figure C.2 depicts the drum waste characterization decision points needed for assigning a reference profile.

Wastes will be accumulated on site in the Container Management Area (CMA) until the results of the HazCat and analytical testing have been reviewed. A hazardous waste designation will be added to the label affixed to the waste container upon receipt of analytical data and determination indicating waste designation. Onsite accumulation of waste designated as hazardous or dangerous waste will not exceed regulatory established accumulation time limitations (i.e., 90 days) for generators.

The IWAG will review waste characterization data and coordinate with the selected TSDF to verify that the waste stream samples are consistent with a reference profile. The IWAG will coordinate with the TSDF to amend the profile based on sample data, which is typically done by email or through the TSDFs company portal. If sample data do not meet the limitations of the existing profiles, an additional profile with disposal and treatment criteria will be created with guidance from the TSDF.

Personnel at the TSDF will verify that the waste stream samples are consistent with the information on the completed profiles. Following profile approval, the transportation, treatment, and disposal activities will be finalized.

4.0 Waste Material Handling and Management

4.1 DRUM AND WASTE REMOVAL, HANDLING, AND SITUATING WITHIN THE TEMPORARY STRUCTURE

Waste materials targeted for removal include drums, drummed waste, pooled free liquids, and readily separable (by mechanical means) potentially combustible material such as (but not limited to) tires, tree stumps, scrap wood, cardboard/paper, or plastic. Based on available records, a drum inventory with content descriptions is provided in Section 2.1.1. Site COCs that are anticipated to be found in wastes are described in Section 2.1.3.

Figure C.3 presents a drum handling workflow schematic for activities within the temporary structure from drum removal through sampling and segregation. Figure C.4 present a drum excavation work flowchart. Procedures for visual assessment and HazCat are generally described in Table C.2 and Sections 4.2.1 and 4.2.2.

Protocols for waste handling are described in the following sections.

4.1.1 Intact Drums

Intact drums will be removed from the excavation and placed into the temporary placement area within the temporary structure for overpacking, opening, and sampling (refer to Figure C.3). Drum removal and handling will be performed by field personnel specifically trained in handling drummed and uncharacterized waste. Excavation and drum removal procedures are generally described in Sections 6.7 and 6.8 of the EDR. Additional details will be provided in the GC's Site-Specific Health and Safety Plan (HASP), which will include a Job Safety Analysis that will be further refined and modified during the course of work.

Drums will be inspected for holes, corrosion, and punctures to verify that drums are intact. Intact drums that are not in good condition (e.g., severe corroding, rusting, flaking, or scaling; apparent structural defects; or leaking) will be placed in overpacks. Drums containing liquids/sludges may be pumped or bailed into an appropriately sized repack drum/container, if they cannot be handled intact. Intact drums found in good condition may be handled in their original container on site but would be grouped into roll-offs for transportation and disposal.

Each drum or overpack drum will be labeled with an identification number as they are removed from the excavation. Excavated 55-gallon drums are to be handled intact or placed in 85-gallon overpack drums, depending upon the condition in which they are encountered. Smaller containers are to be repacked in 85-gallon overpack drums with containers of similar type contents. The drum or overpack drum will then be transferred to the drum placement area within the temporary structure (refer to Figure C.3).

All handling and transport of drummed waste will be conducted in a controlled and safe manner to minimize risk to personnel and the environment and damage to drum and drummed material.

Spill control measures will comply with the requirements of project specifications of the site-specific HASP and Incidental Spill Response Plan (included as Attachment D.1.1 in Appendix D.1).

4.1.2 Bulk Drum Waste

Certain solid and sludge material will be handled via bulk method due to the impracticality of handling as individual drums due to their deteriorated physical condition. Lined roll-offs with tarping systems will be available on site and placed within the temporary structure on an as-needed basis. During drum removal activities, some drums may be found to be deteriorated or damaged to the extent that they cannot be handled safely or as drums. Drum remnants, attendant drum waste, and commingled soil or overburden will be managed for offsite disposal as hazardous waste (bulk drum waste). Bulk drum waste will be accumulated in roll-offs separately from other materials.

4.1.3 CAMU-Eligible Debris

Drum remnants, fragments, or empty drums (drums with minimal residue), which may include debris and hazardous debris as defined at 40 CFR 268.2(g) and (h) respectively, will be crushed via onsite equipment such as an excavator and placed in roll-offs for treatment as necessary and disposal at a Subtitle C facility.

Other readily separable potentially combustible material, such as (but not limited to) tires, tree stumps, scrap wood, cardboard/paper, or plastic, will be mechanically removed and separated from the remaining mixed debris. As combustible materials are encountered, they will be segregated and transferred to roll-offs along with other bulk drum waste.

4.1.4 Bulking of Intact Drums Within the Temporary Structure

Bulking of intact drums depends on several factors, including the ability of the drum to be separated from the waste, the compatibility of materials, the number of drums of like wastes accumulated at any given time, and the accumulation capacity available on site. The intent of bulking is to make it more efficient and cost effective to transport waste.

Upon receipt of the HazCat results and analytical data, the drum or roll-off will be assigned to a reference waste profile and determine whether to bulk/consolidate like drums. If compatible liquids are to be bulked, a vacuum truck will be used to vacuum drum contents in the CMA prior to offsite disposal.

Bulking of intact drums with solids or sludges will occur within the temporary structure. The roll-off will be loaded with waste until the capacity of the roll-off is reached. The original drums will be crushed and placed into a roll-off. The waste materials within the roll-off will then be covered by an additional piece of liner and finally covered by the roll-off tarp. The roll-off will then be placed within the CMA pending offsite disposal at the approved TSDF.

4.2 WASTE SAMPLING AND CHARACTERIZATION APPROACH

As discussed in Section 3.0, the testing approach will focus on the use of HazCat testing and observations to assign a reference waste profile for CAMU-eligible or non-CAMU-eligible disposal and determine which additional laboratory analytical tests are warranted.

Evaluation of physical characteristics and HazCat test results will inform the initial characterization of similar waste based on ICR and NORM. Based on the types of materials in the drums, material handling considerations, HazCat results, and other area-specific factors, the following drummed materials will be segregated for handling and disposal:

- Corrosive liquid materials that could react with other waste (e.g., etching solutions and acid wastes that are estimated to make up about 2 percent of the drums)
- Lab packs
- Radioactive material
- Reactive materials
- Ignitable materials

Figure C.2 presents a waste analysis and profiling decision framework. Detailed procedures for drum and container assessment, opening, and sampling are provided in Attachment C.2.

4.2.1 Initial Characterization and HazCat Testing

Table C.2 describes atmospheric, visual assessment, and HazCat techniques. During initial characterization, the containers will be visually inspected and the surrounding air assessed for indications that the materials inside may be radioactive, explosive, corrosive, toxic, flammable, or lab packed.

To assign the appropriate reference waste profile each drum, and roll-off will be sampled within the temporary structure. Drum contents will be visually inspected, and drums will be sampled for HazCat with sufficient sample volume for offsite laboratory analysis. As sampling is being conducted, air monitoring of open drums will be conducted.

Onsite HazCat analyses will include the following:

- Ignitability (liquids only)
- Corrosivity
- Presence of Oxidizer
- Reactivity with Water
- Reactivity – Sulfide & Cyanide

Additional onsite HazCat screening methods may be identified for use as the work progresses. HazCat will not be performed on drum fragments or drum carcasses.

Following the results of the initial characterization and HazCat analysis, the IWAG will identify preliminary reference waste profile(s), along with a proposed bulking/consolidation strategy (if applicable). Requirements for subsequent laboratory analysis will be based upon the reference waste profile to which wastes are assigned.

4.2.2 Laboratory Analysis

Table C.3 describes which laboratory analytical methods would be required based on the HazCat results and reference waste profile assignment. Offsite analytical methods, sample quantities, and frequency have been developed based on preliminary coordination with TSDFs including USEI Grand View and WM Arlington. Laboratory analysis will be conducted using USEPA SW-846 test methods and procedures at the recommended frequencies developed with the TSDFs. As the work proceeds, a reduced laboratory analytical frequency or analyte list will be implemented following approval of the TSDFs and dependent upon the consistency of the initial analytical results.

4.3 CONTAINER MANAGEMENT AREA

A CMA will be constructed to safely and securely accumulated drums and roll-off wastes for a maximum 90-day accumulation period, prior to offsite treatment and disposal at a TSDF. The approximate location of the CMA is shown on the Site layout figure provided as Figure C.1.

All drums and containers that have been removed from Zone A, sampled, and overpacked or repacked (as necessary based on drum condition) will be transferred from the temporary structure to the CMA. The drums will be secured during transport to the CMA such that they remain upright. Drums will always be handled and placed in an upright position.

Each drum will be clearly labeled to allow identification of the drum even if the drum surface has weathered. Indelible markers and plastic labels can be used to label drums if the drum surface is clean. Drum accumulation will be performed with proper aisle spacing and labels facing the aisle. All overpacks and drums will be placed in the CMA in a space designated for drums and oriented to permit accessibility to each individual drum for inspection and removal. Drums will be further segregated by class based on similar characteristics or contents as determined by HazCat.

Roll-offs will be placed in the CMA in a space designated for roll-offs and will also be properly labeled.

The CMA will be constructed and managed by the GC to comply with WAC 173-303-200 generator requirements for accumulation of waste in containers:

- **Containment.** The CMA will be constructed using 2.5 inches of asphalt as the impermeable surface, underlain by 40-mil high-density polyethylene and 6 inches of crushed surfacing top course, with a 6-inch curb and sump, as shown on Figure C.5. Design features of the CMA include the following:
 - A containment system sized to contain potential leaks and spills as well as the additional volume that would result from the precipitation of a 25-year storm of 24-hour duration.

- The CMA is designed to prevent run on water from the surrounding area and is sloped to maintain positive drainage control in the form of a continuous curb with sump. The sump will be used to remove accumulated precipitation and waste. Wastes and/or accumulated precipitation will be removed from the containment area to ensure that the CMA has sufficient capacity to accommodate a 25-year rain event.
- **Condition of containers.** All drums or containers in the CMA must be in good condition (e.g., no severe corroding, rusting, flaking, or scaling; apparent structural defects; or leaking). Any container not in good condition will be transferred to new overpack or roll-offs, and all leaks and spills will be addressed in accordance with the applicable provisions of WAC 173-303-145 and 173-303-360.
- **Identification of containers.** Containers will be clearly labeled or marked with the words "Dangerous Waste" or "Hazardous Waste" as well as an indication of the hazards of the contents; examples include, but are not limited to, the applicable dangerous waste characteristics of ignitable, corrosive, reactive, and toxic and the major risks associated with the contents. The label or marking must meet the following requirements:
 - Write legible and/or recognizable lettering at a minimum of 0.5 inches in height.
 - Include descriptive words and/or pictograms that identify the hazards associated with the contents of the containers for employees, emergency response personnel, waste handlers, and the public.
 - Affix labels upon transfer of dangerous wastes from one container to another.
 - The owner or operator must destroy or otherwise remove labels from the emptied container, unless the container will continue to be used for accumulating dangerous waste at the facility.
 - Ensure that labels are not obscured, removed, or otherwise unreadable in the course of inspection required under WAC 173-303-320.
- **Compatibility of waste and containers.** Wastes will be accumulated in a container made of or lined with materials which will not react with, and are otherwise compatible with, the dangerous waste to be accumulated, so that the ability of the container to contain the waste is not impaired.
- **Management of containers.** Containers holding dangerous waste will be kept closed. Containers holding dangerous waste will not be opened, handled, or accumulated in a manner which may rupture the container or cause it to leak. A minimum 30-inch aisle space separation will be maintained between rows of containers. Rows of containers will be no more than two wide and allow for unobstructed inspection of each container.
- **Weekly inspections.** Weekly inspections of the CMA will be conducted with emphasis given to the inspection of container and containment conditions and integrity. Containers will be examined for leaks and deterioration while the CMA pad and

containment system will be inspected for presence of standing water, deterioration, or other factors that may impair the integrity of the pad. The log will note the date and time of the inspection, the printed name and the handwritten or electronic signature of the inspector, a notation of the observations made, and the date and nature of any repairs or remedial actions taken. The log will be maintained electronically.

- **Special requirements for ignitable or reactive waste.** Ignitable waste and reactive waste will be managed in a manner equivalent with the International Fire Code. Where no specific standard or requirements are specified in the International Fire Code, or in existing local fire codes, applicable sections of the National Fire Protection Association 30 “Flammable and Combustible Liquids Code” must be used, as well as the requirements of WAC 173-303-395(1)(d).
- **Special requirements for incompatible wastes.** Incompatible wastes, or incompatible wastes and materials, will not be placed in the same container, unless WAC 173-303-395(1)(b) is complied with. Dangerous waste must not be placed in an unwashed container that previously held an incompatible waste or material. Containers holding dangerous wastes that are incompatible with any waste or other materials accumulated nearby in other containers must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device. Containment systems for incompatible wastes will be separate.
- **Completion of the Removal Action.** Upon completion of the Zone A Removal Action, all remaining containers, dangerous waste and dangerous waste residues will be removed from the CMA and disposed of in accordance with applicable state and federal regulations. The CMA will be operated and closed in accordance with the applicable or relevant and appropriate requirements of WAC 173-303-200 including WAC 173-303-200(12). Management of other construction waste streams is described in Section 4.4.

Further details regarding waste handling within the temporary structure are provided in Section 4.1.

4.4 MANAGEMENT OF OTHER CONSTRUCTION WASTE STREAMS

It is anticipated that the following additional waste materials will be generated during implementation of the removal action at the Site:

- **Monitoring Equipment Decommissioning and Installation:** In general, as part of site preparation activities, all subsurface monitoring locations, wells, and conveyance piping within the work area will be removed and capped within the removal action limits. Demolition debris and investigation-derived waste (IDW) generated as a result of these activities will be managed as indicated in the Zone A Decommissioning and Well Installation Plan (Appendix B.8).

- **Demolition Debris:** Demolition debris will be generated during removal of the Zone A capping system and will include non-soil elements of the Zone A capping system (i.e., geotextiles, geomembranes, geosynthetic clay liners, drainage and vent piping, geogrid) along with fencing and concrete elements. Such debris will be classified as items acceptable for reuse on site, items acceptable for recycling, and items for offsite disposal. This waste will be placed in appropriate containers or managed on site in stockpiles prior to reuse on site or transport to a permitted non-hazardous solid waste landfill or recycling facility. Such facilities are identified in Table C.4.
- **General Construction Waste:** General construction waste, including miscellaneous packaging, personal protective equipment, and office trailer trash, will be generated during construction activities. This waste will be placed in appropriate containers and transported to a permitted non-hazardous waste TSDf or recycling facility.
- **Decontamination Material:** Equipment decontamination will generally consist of dry decontamination. This method will consist of manually removing residual soil that has adhered to surfaces of heavy equipment buckets, tracks, or tires utilizing shovels and/or brooms. The removed soil may be placed in one of the roll-off boxes for CAMU-eligible solid waste. If a water-based decontamination is required, decontamination water will be captured and managed as construction water.
- **Construction Water:** Water collected from decontamination activities and stormwater will be filtered and treated with granular activated carbon prior to testing for reuse or disposal. Treated water will be analyzed for COCs and compared with treatment criteria with the goal of reuse on site. Treated water will be reused on site to the extent practical for subsequent decontamination as well as for dust suppression activities. If treated water is unable to be reused on site, it will be disposed of at the publicly owned treatment works or other TSDf permitted to take such wastes. Specific analytical methods and limits for offsite disposal will be determined by the receiving facility. Such facilities are identified in Table C.4.
- **Investigation-Derived Waste:** IDW generated from drum sampling and HazCat analysis may be placed in drums or roll-off boxes for CAMU-eligible solid waste. Samples shipped off site for laboratory analysis will be managed and disposed of by the laboratory in accordance with applicable rules and regulations.

Facilities for these waste streams are identified in Table C.4.

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5.0 Waste Transportation and Disposal

Applicable state and federal hazardous and dangerous waste regulations will be followed during offsite waste transport, treatment, and disposal (40 CFR Part 261, 49 CFR Parts 170-178, and WAC Chapter 173-303), including selection of appropriate transport companies and destination facilities.

Record keeping necessary to maintain documentation during disposal will involve HazCat characterization data, offsite analytical results, profile documentation, weigh tickets, transportation log, and receipt of the manifest. The RE will be the authorized signatory for the IWAG and will retain the generator's copy of the manifest.

A gate across Dietrich Road, just north of the BDI Transfer Station, will be used as an entrance and serve as a check point for final truck inspections, collection of manifest copies, and the return of weigh tickets.

5.1 PREPARING WASTE FOR TRANSPORT AND LOADING

Drummed and bulk wastes will be loaded within the CMA to an approved and licensed hazardous waste transporter. The waste will be inspected prior to shipment to ensure that it is appropriately packaged, labeled, and marked for transport. The vehicle type may vary according to container type. The inspection will include the tires and axles of haulage transport vehicles for debris and remove any adhered debris prior to the vehicles leaving the Site. Decontamination is described in Section 4.4

5.2 WASTE TRANSPORTATION

Documentation carried by the driver will include the following:

- Bills of lading
- Hazardous waste manifests
- Proof of insurance, valid registration, and current driver's license
- Approved transportation route
- Site conduct sheet/proof of Site orientation
- Journey Management Plan
- Tare and net weigh tickets for wastes (to be conducted at a nearby public scale to confirm weights prior to shipping)

The transporter will have the applicable placards on the load. In the unlikely event that a truck is overweight, it will return to the Site and the load will be adjusted. As waste is received at the disposal facility, waste will be weighed a second time to confirm manifest information and for

billing purposes. The manifest will remain with the load at all times, and the driver will be responsible for providing the manifest to the TSDf for signature and processing.

5.3 TRANSPORTATION ROUTES

Each driver will be given a Site safety orientation governing safety expectations, driver conduct guidelines for both on and off site, and the approved transportation routes to the designated TSDFs. Trucks transporting waste materials will be required to have all required transportation documentation listed above for each load.

Transportation haul routes for potential disposal facilities have been developed by the IWAG and were reviewed with local emergency response management and fire chiefs during an in-person meeting in Pasco, Washington, on October 10, 2019. Attachment C.3 includes the haul routes for the hazardous waste disposal facilities identified in Table C.4 that reflect the input from the local emergency response management and fire chiefs. Their input includes the following:

- Haul Route to WM Arlington
 - Preferred highways: US-12 E, US-730 W, I-84 W, OR-19
 - The stretch of US-12 that crosses the Snake River and US-730 interchange (and even near the landfill) experiences heavy agricultural and industrial traffic in the early morning and 3 to 5 p.m. in the afternoon. The traffic increase from farming is from spring through November. That stretch of US-12 has a high rate of accidents and would be best to avoid truck traffic during those time periods.
- Haul Route to USEI Grand View
 - Preferred highways: US-12 E, US-730 W, I-84 E
 - The stretch of US-12 that crosses the Snake River and US-730 interchange experiences heavy agricultural and industrial traffic in the early morning and 3 to 5 p.m. in the afternoon. That stretch has a high rate of accidents and would be best to avoid truck traffic during those time periods.
- Haul Route to the Clean Harbors Aragonite Incineration Facility in Grantsville, Utah
 - Preferred highways: US-12 E, US-730 W, I-84 E, US-93 S, I-80 E
 - The stretch of US-12 that crosses the Snake River and US-730 interchange experiences heavy agricultural and industrial traffic in the early morning and 3 to 5 p.m. in the afternoon. That stretch has a high rate of accidents and would be best to avoid truck traffic during those time periods.
 - The stretch of I-84 between Pendleton, Oregon, and Baker City, Oregon, is closed frequently in the winter due to snow and storms at the 3,000- to 4,000-foot elevation gain. Fire chiefs and local emergency response management recommended avoiding truck traffic during inclement weather.

Transportation routes for non-hazardous waste or debris truck transportation will be determined based on location of disposal facility.

If additional hazardous waste facilities or intermediate loading/offloading facilities are used to support the removal action work, specific transport routes will be identified, taking into account the input provided by the fire chiefs and local emergency response management. All hazardous waste haul routes will require approval by the RE prior to use.

5.4 EMERGENCY CONTACT

Emergency contact information and details including key contacts are outlined in Appendix B.1, Site-Specific HASP Requirements, and Appendix B.2, Contingency Plan.

5.5 OFFSITE TREATMENT AND DISPOSAL FACILITIES

Waste will be disposed of only at RCRA Subtitle C and D disposal facilities. Disposal facilities are provided in Table C.4.

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6.0 Zone A Removal Record Keeping and Disposal Documentation

Disposal documentation will be provided to Ecology with the Zone A Excavation, Removal, and Offsite Disposal Construction Completion Technical Memorandum, as required in Task A.4 of the SOW.

Disposal of hazardous or dangerous waste generated during implementation of this Waste Plan will be recorded and reported under the Ecology-issued Site Identification Number. An authorized representative will sign profiles and be on site to sign the manifests prior to shipment.

6.1 WASTE PROFILES AND MANIFESTS

The transportation of contaminated materials to offsite TSDFs requires appropriate federal and/or state documentation in the form of a hazardous waste manifest to accompany all hazardous and dangerous waste shipments. After receipt of all required analytical data, the waste generated from the Zone A Removal Action will be profiled. The GC will review the data, with the assistance of the RE and TSDF, to ensure that the wastes are shipped using the correct profile and waste description. The TSDF will prepare pre-printed manifests that align with the approved profile number. The manifest will be signed by the driver and an authorized representative (of the RE team) on behalf of the generator (the IWAG). Manifests will be consistent with applicable regulations.

The TSDF will provide a final signed copy of the manifest with treatment and disposal codes within 35 days. If not, the facility must be contacted and an exception report will be filed if no manifest is received from the facility after 45 days. A certificate of disposal will be issued by the final destination facility.

In the event that hazardous or dangerous waste are found to be outside the profile they were submitted under by the designated TSDF, the TSDF will work with the IWAG to reprofile the waste. The generator's authorized representative will sign either a new profile or an amended profile and return to the generator within 30 days of notification. Waste that cannot be disposed of by the off-site TSDF will be stored on site will be sent to an appropriate TSDF under a new outbound manifest. Record keeping for waste is described in Sections 6.2 through 6.4.

6.2 GENERATOR RECORD KEEPING

The following documents will be maintained on site during the waste removal operation and provided to IWAG at the completion of the work:

- Waste characterization documentation
- Waste profiling documentation including hazardous constituent and LDR forms
- Weigh scale receipts: Copies of weigh scale receipts must be submitted to the RE or Owner and include the following:
 - Location, date, and time of weighing
 - Measured weights

- Vehicle and waste container identification
- Shipment identification number
- Manifest (initial and final TSDf copies), manifest number, bill of lading, and any related receipts or paperwork
- Certificates of Disposal issued by the TSDf for each shipment delivered to the TSDf

Generator copies of the manifest will be submitted to the IWAG at the end of every month.

The IWAG will keep a copy of each manifest signed by the initial transporter in accordance with WAC 173-303-180(3), manifest procedures, for 3 years, or until they receive a signed copy from the designated facility that received the waste. The signed facility copy will be retained for at least 5 years from the date the waste was accepted by the initial transporter.

The IWAG will keep records of waste designation, including any knowledge-based designations or test results, waste analyses, or other determinations made in accordance with WAC 173-303-170 for designating dangerous waste. This will include records that identify whether a solid waste is a dangerous waste, for at least 5 years from the date that the waste was last transferred for offsite treatment, storage, or disposal.

6.3 TRANSPORTATION RECORDS

Disposal logs will be maintained for each load of waste and debris or other material that leaves the Site. Documentation will include the following information:

- Date and time each truck departs the Site
- Vehicle type and license number
- Transport company
- Waste manifest number or bill of lading number
- Material description including number of containers
- Approximate volume or weight of material being removed
- Waste classification

6.4 DISPOSAL FACILITY RECORDS

A copy of each TSDf entry scale ticket shall be provided and include at a minimum the following information:

- Date and time each truck arrived the TSDf
- Manifest number
- Material description (i.e., soil, concrete, pipe)
- Exact volume or weight of material being deposited
- Waste classification

The TSDf will provide a signed and dated copy of the manifest after receipt of each load. After final waste treatment or disposal is complete, a certification of disposal will be provided by the TSDf that specifies the treatment or disposal method(s) used. For disposal at an offsite permitted hazardous waste TSDf, Chemical Waste Management and US Ecology will comply with LDR certification requirements of 40 CFR 268.7(b)(4), except that the certification will be with respect to the PHC treatment requirement of WAC 173-303-664910(1)(b).

6.5 GENERATOR REPORTING

The IWAG will submit generator reports to Ecology in accordance with WAC 173-303-230 within the time period allowed for each report. The following reporting requirements may be applicable:

- **Annual Reports:** A generator report will be submitted annually no later than March 1 of the preceding year to report all offsite disposal of hazardous waste.
- **Exception Reports:** A generator exception report will be submitted to Ecology if the IWAG has not received a copy of the manifest with the handwritten signature of the owner/operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

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7.0 References

Anchor QEA, LLC, Environmental Partners, Inc., Amec Foster Wheeler Environment & Infrastructure, Inc. 2017. *Draft Final Focused Feasibility Study Pasco Landfill National Priorities Listed Site*. August.

Burlington Environmental Inc. (Burlington). 1993. *Final Draft Phase I Remedial Investigation, Pasco Landfill*. Prepared for Pasco Landfill PLP Group. December.

Washington State Department of Ecology (Ecology). 2019a. *Cleanup Action Plan—Pasco Landfill NPL Site*. Toxics Cleanup Program. August.

_____. 2019b. *Exhibit C Pasco Sanitary Landfill NPL Site Scope of Work and Schedule*. August.

Pasco Sanitary Landfill NPL Site
Zone A Removal Action
Engineering Design Report

Appendix C
Waste Handling, Characterization,
and Disposal Plan

Tables

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**Table C.1
Identification of Principal Hazardous Constituents**

Analyte	CAS No.	RCRA Characteristic Waste Standards			RCRA LDR UTS Standards (1)		Principal Hazardous Constituent Screening Levels (2)				Soil Data Compared to RCRA Standards and PHCs				MW-52S NAPL Data Compared to RCRA Standards and PHCs			
		D Codes	20X TCLP Screening Level	Regulatory Level	Nonwastewater Standard Concentration (3)	Wastewater Standard Concentration (4)	Nonwastewater		Wastewater		Max Concentration Detected in Zone A Soil Sample	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Pass Fail PHC	Max Concentration in NAPL Sample (5)	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Max Result Pass Fail PHC
			mg/kg	mg/L unless noted	mg/kg unless noted as mg/L for	mg/L	mg/kg	Basis (2)	mg/L	Basis (2)	mg/kg	pass/fail	pass/fail	pass/fail	mg/kg	pass/fail	pass/fail	pass/fail
Volatile Organic Compounds by 5030B/8260																		
1,1,1,2-Tetrachloroethane	630-20-6	--	--	--	6	0.057	500,000	C	1,700,000	C	--	--	--	--	--	--	--	--
1,1,1-Trichloroethane	71-55-6	--	--	--	6	0.054	70,000,000	NC	350,000,000	NC	210	--	fail	pass	--	--	--	--
1,1,2,2-Tetrachloroethane	79-34-5	--	--	--	6	0.057	66,000	C	220,000	C	--	--	--	--	4,500	--	fail	pass
1,1,2-Trichloroethane	79-00-5	--	--	--	6	0.054	230,000	C	770,000	C	210	--	fail	pass	150	--	fail	pass
1,1,2-Trichlorotrifluoroethane	76-13-1	--	--	--	30	0.057	1,100,000,000	NC	5,300,000,000	NC	3.4	--	pass	pass	--	--	--	--
1,1-Dichloroethane	75-34-3	--	--	--	6	0.059	2,300,000	C	7,700,000	C	38	--	fail	pass	40	--	fail	pass
1,1-Dichloroethene	75-35-4	D029	14	0.7	6	0.025	1,800,000	NC	8,800,000	NC	0.54	pass	pass	pass	1.8	pass	pass	pass
1,1-Dichloropropene	563-58-6	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2,3-Trichlorobenzene	87-61-6	--	--	--	--	--	--	--	--	--	4.4	--	--	--	46	--	--	--
1,2,3-Trichloropropane	96-18-4	--	--	--	30	0.85	440	C	1,500	C	--	--	--	--	6,500	--	fail	fail
1,2,3-Trimethylbenzene	526-73-8	--	--	--	--	--	350,000	NC	--	--	--	--	--	--	--	--	--	--
1,2,4-Trichlorobenzene	120-82-1	--	--	--	19	0.055	450,000	C	1,500,000	C	26	--	fail	pass	100	--	fail	pass
1,2,4-Trimethylbenzene	95-63-6	--	--	--	--	--	350,000	NC	--	--	1,100	--	--	pass	71,000	--	--	pass
1,2-Dibromo-3-Chloropropane	96-12-8	--	--	--	15	0.11	16,000	C	55,000	C	--	--	--	--	4,400	--	fail	pass
1,2-Dibromoethane	106-93-4	--	--	--	15	0.028	6,600	C	22,000	C	--	--	--	--	9.8	--	pass	pass
1,2-Dichlorobenzene	95-50-1	--	--	--	6	0.088	3,200,000	NC	16,000,000	NC	17	--	fail	pass	1,200	--	fail	pass
1,2-Dichloroethane	107-06-2	D028	10	0.5	6	0.21	140,000	C	480,000	C	35	fail	fail	pass	36	fail	fail	pass
1,2-Dichloropropane	78-87-5	--	--	--	18	0.85	350,000	C	1,200,000	C	--	--	--	--	--	--	--	--
1,3,5-Trimethylbenzene	108-67-8	--	--	--	--	--	350,000	NC	--	--	650	--	--	pass	17,000	--	--	pass
1,3-Dichlorobenzene	541-73-1	--	--	--	6	0.036	60	10X UTS	0.36	10X UTS	0.18	--	pass	pass	15	--	fail	pass
1,3-Dichloropropane	142-28-9	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,4-Dichlorobenzene	106-46-7	D027	150	7.5	6	0.09	2,400,000	C	8,100,000	C	2.4	pass	pass	pass	130	pass	fail	pass
2,2-Dichloropropane	594-20-7	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
2-Butanone (MEK)	78-93-3	D035	4,000	200	36	0.28	21,000,000	NC	110,000,000	NC	2,500	pass	fail	pass	280	pass	fail	pass
2-Chlorotoluene	95-49-8	--	--	--	--	--	700,000	NC	--	--	--	--	--	--	690	--	--	pass
2-Hexanone (MBK)	591-78-6	--	--	--	--	--	180,000	NC	--	--	22	--	--	pass	3,200	--	--	pass
4-Chlorotoluene	106-43-4	--	--	--	--	--	--	--	--	--	--	--	--	--	520	--	--	--
4-Methyl-2-Pentanone (MIBK)	108-10-1	--	--	--	33	0.14	2,800,000	NC	14,000,000	NC	1,600	--	fail	pass	8,800	--	fail	pass
Acetone	67-64-1	--	--	--	160	0.28	32,000,000	NC	160,000,000	NC	1,700	--	fail	pass	320	--	fail	pass
Acrylonitrile	107-13-1	--	--	--	84	0.24	24,000	C	81,000	C	--	--	--	--	--	--	--	--
Benzene	71-43-2	D018	10	0.5	10	0.14	240,000	C	800,000	C	11	fail	fail	pass	37	fail	fail	pass
Bromobenzene	108-86-1	--	--	--	--	--	280,000	NC	--	--	--	--	--	--	--	--	--	--
Bromodichloromethane	75-27-4	--	--	--	15	0.35	210,000	C	710,000	C	0.017	--	pass	pass	--	--	--	--
Bromoform	75-25-2	--	--	--	15	0.63	1,700,000	C	5,500,000	C	--	--	--	--	--	--	--	--
Carbon disulfide	75-15-0	--	--	--	4.8	3.8	3,500,000	NC	18,000,000	NC	0.21	--	pass	pass	--	--	--	--
Bromomethane	74-83-9	--	--	--	15	0.11	49,000	NC	250,000	NC	--	--	--	--	--	--	--	--
Carbon Tetrachloride	56-23-5	D019	10	0.5	6	0.057	190,000	C	630,000	C	--	--	--	--	--	--	--	--
Chlorobenzene	108-90-7	D021	2,000	100	6	0.057	700,000	NC	3,500,000	NC	3.1	pass	pass	pass	76	pass	fail	pass
Chlorodibromomethane	124-48-1	--	--	--	15	0.057	160,000	C	520,000	C	--	--	--	--	--	--	--	--
Chloroethane	75-00-3	--	--	--	6	0.27	60	10X UTS	2.7	10X UTS	0.15	--	pass	pass	--	--	--	--
Chloroform	67-66-3	D022	120	6	6	0.046	420,000	C	1,400,000	C	4.3	pass	pass	pass	--	--	--	--
Chloromethane	74-87-3	--	--	--	30	0.19	300	10X UTS	1.9	10X UTS	0.031	--	pass	pass	--	--	--	--
Cis-1,2-Dichloroethene	156-59-2	--	--	--	--	--	70,000	NC	--	--	--	--	--	--	43	--	--	pass
Cis-1,3-Dichloropropene	10061-01-5	--	--	--	18	0.036	180	10X UTS	0.36	10X UTS	--	--	--	--	--	--	--	--

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		D Codes	20X TCLP Screening Level	Regulatory Level	Nonwastewater Standard Concentration (3)	Wastewater Standard Concentration (4)	Nonwastewater		Wastewater		Max Concentration Detected in Zone A Soil Sample	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Pass Fail PHC	Max Concentration in NAPL Sample (5)	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Max Result Pass Fail PHC
			mg/kg	mg/L unless noted	mg/kg unless noted as mg/L for	mg/L	mg/kg	Basis (2)	mg/L	Basis (2)	mg/kg	pass/fail	pass/fail	pass/fail	mg/kg	pass/fail	pass/fail	pass/fail
Volatile Organic Compounds by 5030B/8260 (cont.)																		
Dibromomethane	74-95-3	--	--	--	15		0.11	350,000	NC	1,800,000	NC	--	--	--	--	--	--	--
Dichlorodifluoromethane	75-71-8	--	--	--	7.2		0.23	7,000,000	NC	35,000,000	NC	--	--	--	--	--	--	--
Di-Isopropyl Ether	108-20-3	--	--	--	--		--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	100-41-4	--	--	--	10		0.057	3,500,000	NC	18,000,000	NC	--	--	--	23,000	--	fail	pass
Hexachloro-1,3-Butadiene	87-68-3	D033	10	0.5	5.6		0.055	170,000	C	560,000	C	--	--	--	--	--	--	--
Isopropylbenzene	98-82-8	--	--	--	--		--	3,500,000	NC	--	--	180	--	--	pass	2,300	--	pass
Methyl Tert-Butyl Ether	1634-04-4	--	--	--	--		--	7,300,000	C	--	--	--	--	--	--	--	--	--
Methylene Chloride	75-09-2	--	--	--	30		0.089	210,000	NC	1,100,000	NC	130	--	fail	pass	130	--	fail
Naphthalene	91-20-3	--	--	--	5.6		0.059	700,000	NC	3,500,000	NC	160	--	fail	pass	5,100	--	fail
N-Butylbenzene	104-51-8	--	--	--	--		--	1,800,000	NC	--	--	65	--	--	pass	3,200	--	pass
N-Propylbenzene	103-65-1	--	--	--	--		--	3,500,000	NC	--	--	510	--	--	pass	11,000	--	pass
P-Isopropyltoluene	99-87-6	--	--	--	--		--	--	--	--	--	20	--	--	--	1,500	--	--
Sec-Butylbenzene	135-98-8	--	--	--	--		--	3,500,000	NC	--	--	17	--	--	pass	1,300	--	pass
Styrene	100-42-5	--	--	--	--		--	7,000,000	NC	--	--	1,800	--	--	pass	16,000	--	pass
Tert-Butyl alcohol	75-65-0	--	--	--	--		--	--	--	--	--	5	--	--	--	--	--	--
Tert-Butylbenzene	98-06-6	--	--	--	--		--	3,500,000	NC	--	--	0.25	--	--	pass	4,200	--	pass
Tetrachloroethene	127-18-4	D039	14	0.7	6		0.056	210,000	NC	1,100,000	NC	970	fail	fail	pass	500	fail	fail
Toluene	108-88-3	--	--	--	10		0.08	2,800,000	NC	14,000,000	NC	5,700	--	fail	pass	43,000	--	fail
Trans-1,2-Dichloroethene	156-60-5	--	--	--	30		0.054	700,000	NC	3,500,000	NC	0.27	--	pass	pass	--	--	--
Trans-1,3-Dichloropropene	10061-02-6	--	--	--	18		0.036	180	10X UTS	0.36	10X UTS	--	--	--	--	--	--	--
Trichloroethene	79-01-6	D040	10	0.5	6		0.054	18,000	NC	88,000	NC	1,800	fail	fail	pass	1,700	fail	fail
Trichlorofluoromethane	75-69-4	--	--	--	30		0.02	11,000,000	NC	53,000,000	NC	0.14	--	pass	pass	--	--	--
Vinyl Chloride	75-01-4	D043	4	0.2	6		0.27	8,800	C	29,000	C	0.076	pass	pass	pass	4.7	fail	pass
Xylenes, Total	1330-20-7	--	--	--	30		0.32	7,000,000	NC	35,000,000	NC	7200	--	fail	pass	--	--	--
Pesticides by 8081																		
4,4-DDD	72-54-8	--	--	--	0.087		0.023	1,100	NC	11,000	NC	--	--	--	--	--	--	--
4,4-DDS	72-55-9	--	--	--	0.087		0.031	39,000	C	260,000	C	--	--	--	--	--	--	--
4,4-DDT	50-29-3	--	--	--	0.087		0.0039	39,000	C	260,000	C	0.95	--	fail	pass	--	--	--
Aldrin	309-00-2	--	--	--	0.066		0.021	770	C	2,600	C	0.12	--	fail	pass	--	--	--
Alpha BHC	319-84-6	--	--	--	0.066		0.00014	2,100	C	14,000	C	--	--	--	--	--	--	--
Beta BHC	319-85-7	--	--	--	0.066		0.00014	7,300	C	49,000	C	0.02	--	pass	pass	--	--	--
Chlordane	57-74-9	D020	0.6	0.03	--		--	--	--	--	--	--	--	--	--	--	--	--
Delta BHC	319-86-8	--	--	--	0.066		0.023	0.66	10X UTS	0.23	10X UTS	--	--	--	--	--	--	--
Dieldrin	60-57-1	--	--	--	0.13		0.017	820	C	5,500	C	0.037	--	pass	pass	--	--	--
Endosulfan I	959-98-8	--	--	--	0.066		0.023	0.66	10X UTS	0.23	10X UTS	0.011	--	pass	pass	--	--	--
Endosulfan II	33213-65-9	--	--	--	0.13		0.029	1.3	10X UTS	0.29	10X UTS	--	--	--	--	--	--	--
Endosulfan Sulfate	1031-07-8	--	--	--	0.13		0.029	210,000	NC	2,100,000	NC	--	--	--	--	--	--	--
Endrin	72-20-8	D012	0.4	0.02	0.13		0.0028	11,000	NC	110,000	NC	0.1	pass	pass	pass	--	--	--
Endrin Aldehyde	7421-93-4	--	--	--	0.13		0.025	1.3	10X UTS	0.25	10X UTS	0.11	--	pass	pass	--	--	--
Endrin Ketone	53494-70-5	--	--	--	--		--	--	--	--	--	--	--	--	--	--	--	--
Gamma BHC	58-89-9	D013	8	0.4	0.066		0.0017	12,000	C	80,000	C	0.057	pass	pass	pass	--	--	--
Heptachlor	76-44-8	D031	0.16	0.008	0.066		0.0012	2,900	C	19,000	C	0.063	pass	pass	pass	--	--	--
Heptachlor Epoxide	1024-57-3	--	--	--	0.066		0.016	1,400	C	4,800	C	--	--	--	--	--	--	--
Hexachlorobenzene	118-74-1	D032	2.6	0.13	10		0.055	8,200	C	55,000	C	--	--	--	--	--	--	--

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		D Codes	20X TCLP Screening Level	Regulatory Level	Nonwastewater Standard Concentration (3)	Wastewater Standard Concentration (4)	Nonwastewater		Wastewater		Max Concentration Detected in Zone A Soil Sample	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Pass Fail PHC	Max Concentration in NAPL Sample (5)	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Max Result Pass Fail PHC	
							mg/kg unless noted	mg/L	mg/kg	Basis (2)									mg/L
Pesticides by 8081 (cont.)																			
Methoxychlor	72-43-5	D014	200	10	0.18		0.25	180,000	NC	1,800,000	NC	0.078	pass	pass	pass	--	--	--	--
Toxaphene	8001-35-2	D015	10	0.5	2.6		0.0095	12,000	C	80,000	C	--	--	--	--	--	--	--	--
Herbicides by 8151/8151																			
2,4,5-T	93-76-5	--	--	--	7.9		0.72	350,000	NC	3,500,000	NC	--	--	--	--	--	--	--	--
2,4,5-Tp (Silvex)	93-72-1	D017	20	1	7.9		0.72	280,000	NC	2,800,000	NC	--	--	--	--	--	--	--	--
2,4-D	94-75-7	D016	200	10	10		0.72	350,000	NC	3,500,000	NC	0.34	pass	pass	pass	--	--	--	--
2,4-DB	94-82-6	--	--	--	--		--	1,100,000	NC	--	--	0.024	--	--	pass	--	--	--	--
Dalapon	75-99-0	--	--	--	--		--	1,100,000	NC	--	--	--	--	--	--	--	--	--	--
Dicamba	1918-00-9	--	--	--	--		--	1,100,000	NC	--	--	0.021	--	--	pass	--	--	--	--
Dichloroprop	120-36-5	--	--	--	--		--	--	--	--	--	--	--	--	--	--	--	--	--
Dinoseb	88-85-7	--	--	--	2.5		0.066	35,000	NC	350,000	NC	--	--	--	--	--	--	--	--
MCPA	94-74-6	--	--	--	--		--	18,000	NC	--	--	0.54	--	--	pass	--	--	--	--
MCPP	93-65-2	--	--	--	--		--	35,000	NC	--	--	0.7	--	--	pass	--	--	--	--
Metals by 6010/7470																			
Antimony	7440-36-0	--	--	--	1.15	mg/L	1.9	14,000	NC	140,000	NC	1.6	--	fail	pass	--	--	--	--
Arsenic	7440-38-2	D004	100	5	5	mg/L	1.4	8,800	C	58,000	C	9.8	pass	fail	pass	--	--	--	--
Barium	7440-39-3	D005	2,000	100	21	mg/L	1.2	7,000,000	NC	70,000,000	NC	280	pass	fail	pass	--	--	--	--
Beryllium	7440-41-7	--	--	--	1.22	mg/L	0.82	70,000	NC	700,000	NC	0.9	--	pass	pass	--	--	--	--
Cadmium	7440-43-9	D006	20	1	0.11	mg/L	0.69	35,000	(6)	180,000	NC	3	pass	fail	pass	--	--	--	--
Chromium	7440-47-3	D007	100	5	0.6	mg/L	2.77	110,000	(7)	1,100	(7)	86.1	pass	fail	pass	--	--	--	--
Cyanides (Amenable) (8)	57-12-5	--	--	--	590		1.2	22,000	NC	220,000	NC	--	--	--	--	--	--	--	--
Cyanides (Total) (8)	57-12-5	--	--	--	590		1.2	22,000	NC	220,000	NC	--	--	--	--	--	--	--	--
Fluoride (9)	16984-48-8	--	--	--	--		35	2,100,000	NC	21,000,000	NC	--	--	--	--	--	--	--	--
Lead	7439-92-1	D008	100	5	0.75	mg/L	0.69	10,000	(10)	6.9	10X UTS	590	fail	fail	pass	--	--	--	--
Mercury	7439-97-6	D009	4	0.2	0.2	mg/L	--	20	(10)	--	--	2.3	pass	fail	pass	--	--	--	--
Nickel	7440-02-0	--	--	--	11	mg/L	3.98	700,000	NC	7,000,000	NC	63	--	fail	pass	--	--	--	--
Selenium (11)	7782-49-2	D010	20	1	5.7	mg/L	0.82	180,000	NC	1,800,000	NC	--	--	--	--	--	--	--	--
Silver	7440-22-4	D011	100	5	0.14	mg/L	0.43	180,000	NC	1,800,000	NC	1.8	pass	fail	pass	--	--	--	--
Sulfide (9)	18496-25-8	--	--	--	--		14	--	--	140	10X UTS	--	--	--	--	--	--	--	--
Thallium	7440-28-0	--	--	--	0.2	mg/L	1.4	350	NC	3,500	NC	--	--	--	--	--	--	--	--
Vanadium (9)	7440-62-2	--	--	--	1.6	mg/L	4.3	180,000	NC	1,800,000	NC	--	--	--	--	--	--	--	--
Zinc (9)	7440-66-6	--	--	--	4.3	mg/L	2.61	11,000,000	NC	110,000,000	NC	790	--	fail	pass	--	--	--	--
Semivolatile Organic Compounds and Polycyclic Aromatic Hydrocarbons by 8270D																			
1,2,4,5-Tetrachlorobenzene	95-94-3	--	--	--	14		0.055	11,000	NC	110,000	NC	--	--	--	--	--	--	--	--
1-Methylnaphthalene	90-12-0	--	--	--	--		--	450,000	C	--	--	14	--	--	pass	400	--	--	pass
2,2-Oxybis(1-Chloropropane)	108-60-1	--	--	--	--		--	190,000	C	--	--	--	--	--	--	--	--	--	--
2,4,5-Trichlorophenol	95-95-4	D041	8,000	400	7.4		0.18	3,500,000	NC	18,000,000	NC	--	--	--	--	--	--	--	--
2,4,6-Trichlorophenol	88-06-2	D042	40	2	7.4		0.035	35,000	NC	180,000	NC	--	--	--	--	--	--	--	--
2,4-Dichlorophenol	120-83-2	--	--	--	14		0.044	110,000	NC	530,000	NC	--	--	--	--	--	--	--	--
2,4-Dimethylphenol	105-67-9	--	--	--	14		0.036	700,000	NC	3,500,000	NC	8.3	--	pass	pass	--	--	--	--
2,4-Dinitrophenol	51-28-5	--	--	--	160		0.12	70,000	NC	700,000	NC	1.9	--	pass	pass	--	--	--	--
2,4-Dinitrotoluene	121-14-2	D030	2.6	0.13	140		0.32	42,000	C	280,000	C	--	--	--	--	--	--	--	--
2,6-Dinitrotoluene	606-20-2	--	--	--	28		0.55	8,800	C	58,000	C	--	--	--	--	--	--	--	--

Table C.1
Identification of Principal Hazardous Constituents

Analyte	CAS No.	RCRA Characteristic Waste Standards			RCRA LDR UTS Standards (1)		Principal Hazardous Constituent Screening Levels(2)				Soil Data Compared to RCRA Standards and PHCs				MW-52S NAPL Data Compared to RCRA Standards and PHCs			
		D Codes	20X TCLP Screening Level	Regulatory Level	Nonwastewater Standard Concentration (3)	Wastewater Standard Concentration (4)	Nonwastewater		Wastewater		Max Concentration Detected in Zone A Soil Sample	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Pass Fail PHC	Max Concentration in NAPL Sample (5)	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Max Result Pass Fail PHC
			mg/kg	mg/L unless noted	mg/kg unless noted as mg/L for	mg/L	mg/kg	Basis (2)	mg/L	Basis (2)	mg/kg	pass/fail	pass/fail	pass/fail	mg/kg	pass/fail	pass/fail	pass/fail
Semivolatile Organic Compounds and Polycyclic Aromatic Hydrocarbons by 8270D (cont.)																		
2-Chloronaphthalene	91-58-7	--	--	--	5.6		0.055	2,800,000	NC	14,000,000	NC	--	--	--	--	--	--	--
2-Chlorophenol	95-57-8	--	--	--	5.7		0.044	180,000	NC	880,000	NC	4.4	--	pass	pass	--	--	--
2-Methylnaphthalene	91-57-6	--	--	--	--		--	140,000	NC	--	--	27	--	--	pass	740	--	pass
2-Nitroaniline	88-74-4	--	--	--	14		0.27	350,000	NC	3,500,000	NC	--	--	--	--	--	--	--
2-Nitrophenol	88-75-5	--	--	--	13		0.028	130	10X UTS	0.28	10X UTS	--	--	--	--	--	--	--
3&4-Methyl Phenol	84989-04-8	--	--	--	--		--	--	--	--	--	57	--	--	--	--	--	--
3,3-Dichlorobenzidine	91-94-1	--	--	--	--		--	29,000	C	--	--	1800	--	--	pass	--	--	--
3-Nitroaniline	99-09-2	--	--	--	--		--	--	--	--	--	--	--	--	--	--	--	--
4,6-Dinitro-2-Methylphenol	534-52-1	--	--	--	160		0.28	2,800	NC	28,000	NC	--	--	--	--	--	--	--
4-Bromophenyl-Phenylether	101-55-3	--	--	--	15		0.055	150	10X UTS	1	10X UTS	--	--	--	--	--	--	--
4-Chloro-3-Methylphenol	59-50-7	--	--	--	14		0.018	3,500,000	NC	35,000,000	NC	--	--	--	--	--	--	--
4-Chloroaniline	106-47-8	--	--	--	16		0.46	66,000	C	220,000	C	--	--	--	--	--	--	--
4-Chlorophenyl-Phenylether	7005-72-3	--	--	--	--		--	--	--	--	--	--	--	--	--	--	--	--
4-Nitroaniline	100-01-6	--	--	--	28		0.028	660,000	C	4,400,000	C	--	--	--	--	--	--	--
4-Nitrophenol	100-02-7	--	--	--	29		0.12	290	10X UTS	1.2	10X UTS	0.023	--	pass	pass	--	--	--
Acenaphthene	83-32-9	--	--	--	3.4		0.059	2,100,000	NC	21,000,000	NC	5.2	--	fail	pass	--	--	--
Acenaphthylene	208-96-8	--	--	--	3.4		0.059	34	10X UTS	0.59	10X UTS	0.001	10X UTS	pass	pass	--	--	--
Acetophenone	98-86-2	--	--	--	9.7		0.01	3,500,000	NC	18000000	NC	--	--	--	--	--	--	--
Anthracene	120-12-7	--	--	--	3.4		0.059	11,000,000	NC	110,000,000	NC	2.9	--	pass	pass	--	--	--
Atrazine	1912-24-9	--	--	--	--		--	57,000	C	--	--	--	--	--	--	--	--	--
Benzaldehyde	100-52-7	--	--	--	--		--	3,300,000	C	--	--	--	--	--	--	--	--	--
Benzo(A)Anthracene	56-55-3	--	--	--	3.4		0.059	34	10X UTS	0.59	10X UTS	1.4	--	pass	pass	--	--	--
Benzo(A)Pyrene	50-32-8	--	--	--	3.4		0.061	13,000	C	88,000	C	0.34	--	pass	pass	--	--	--
Benzo(B)Fluoranthene	205-99-2	--	--	--	6.8		0.11	68	10X UTS	1.1	10X UTS	0.78	--	pass	pass	--	--	--
Benzo(G,H,I)Perylene	191-24-2	--	--	--	1.8		0.0055	18	10X UTS	0.055	10X UTS	0.17	--	pass	pass	--	--	--
Benzo(K)Fluoranthene	207-08-9	--	--	--	6.8		0.11	68	10X UTS	1.1	10X UTS	0.31	--	pass	pass	--	--	--
Benzylbutyl Phthalate	85-68-7	--	--	--	28		0.017	6,900,000	C	46,000,000	C	14	--	pass	pass	--	--	--
Biphenyl	92-52-4	--	--	--	--		--	1,600,000	C	--	--	--	--	--	--	--	--	--
Bis(2-Chlorethoxy)Methane	111-91-1	--	--	--	7.2		0.036	72	10X UTS	0.36	10X UTS	--	--	--	--	--	--	--
Bis(2-Chloroethyl)Ether	111-44-4	--	--	--	6		0.033	12,000	C	40,000	C	0.4	--	pass	pass	--	--	--
Bis(2-Ethylhexyl)Phthalate	117-81-7	--	--	--	28		0.28	940,000	C	6,300,000	C	140	--	fail	pass	--	--	--
Caprolactam	105-60-2	--	--	--	--		--	18,000,000	NC	--	--	--	--	--	--	--	--	--
Carbazole	86-74-8	--	--	--	--		--	--	--	--	--	2.1	--	--	--	--	--	--
Chrysene	218-01-9	--	--	--	3.4		0.059	34	10X UTS	0.59	10X UTS	1.4	--	pass	pass	--	--	--
Cresol ⁽¹²⁾		D026	4,000	200	1		200	10	10X UTS	2,000	10X UTS	0	pass	pass	pass	--	--	--
Dibenzo(A,H)Anthracene	53-70-3	--	--	--	8.2		0.055	82	10X UTS	0.55	10X UTS	0.0017	--	pass	pass	--	--	--
Dibenzofuran	132-64-9	--	--	--	--		--	35,000	NC	--	--	2.3	--	--	pass	--	--	--
Diethyl Phthalate	84-66-2	--	--	--	28		0.2	28,000,000	NC	280,000,000	NC	1.1	--	pass	pass	--	--	--
Dimethyl Phthalate	131-11-3	--	--	--	28		0.047	280	10X UTS	0.47	10X UTS	1.4	--	pass	pass	--	--	--
Di-N-Butyl Phthalate	84-74-2	--	--	--	28		0.057	3,500,000	NC	35,000,000	NC	29	--	fail	pass	--	--	--
Di-N-Octyl Phthalate	117-84-0	--	--	--	28		0.017	350,000	NC	3,500,000	NC	3.8	--	pass	pass	--	--	--
Fluoranthene	206-44-0	--	--	--	3.4		0.068	1,400,000	NC	14,000,000	NC	6.7	--	fail	pass	--	--	--
Fluorene	86-73-7	--	--	--	3.4		0.059	1,400,000	NC	14,000,000	NC	5.5	--	fail	pass	--	--	--
Hexachloro-1,3-Butadiene	87-68-3	D033	10	0.5	5.6		0.055	170,000	C	560,000	C	--	--	--	--	--	--	--

**Table C.1
Identification of Principal Hazardous Constituents**

Analyte	CAS No.	RCRA Characteristic Waste Standards			RCRA LDR UTS Standards (1)		Principal Hazardous Constituent Screening Levels (2)				Soil Data Compared to RCRA Standards and PHCs				MW-52S NAPL Data Compared to RCRA Standards and PHCs				
		D Codes	20X TCLP Screening Level	Regulatory Level	Nonwastewater Standard Concentration (3)	Wastewater Standard Concentration (4)	Nonwastewater		Wastewater		Max Concentration Detected in Zone A Soil Sample	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Pass Fail PHC	Max Concentration in NAPL Sample (5)	Pass Fail 20x TCLP rule	Pass Fail LDR UTS	Max Result Pass Fail PHC	
			mg/kg	mg/L unless noted	mg/kg unless noted as mg/L for	mg/L	mg/kg	Basis (2)	mg/L	Basis (2)	mg/kg	pass/fail	pass/fail	pass/fail	mg/kg	pass/fail	pass/fail	pass/fail	
Semivolatile Organic Compounds and Polycyclic Aromatic Hydrocarbons by 8270D (cont.)																			
Hexachlorobenzene	118-74-1	D032	2.6	0.13	10		0.055	8,200	C	55,000	C	--	--	--	--	--	--	--	
Hexachlorocyclopentadiene	77-47-4	--	--	--	2.4		0.057	210,000	NC	1,100,000	NC	--	--	--	--	--	--	--	
Hexachloroethane	67-72-1	D034	60	3	30		0.055	25,000	NC	1,100,000	C	--	--	--	--	--	--	--	
Indeno(1,2,3-c,d)Pyrene	193-39-5	--	--	--	3.4		0.0055	34	10X UTS	0.055	10X UTS	0.11	--	pass	pass	--	--	--	
Isophorone	78-59-1	--	--	--	--		--	14,000,000	C	--	--	63	--	--	pass	--	--	--	
m-Cresol (12)	108-39-4	D024	4,000	200	5.6		0.77	1,800,000	NC	8,800,000	NC	--	--	--	--	--	--	--	
Naphthalene	91-20-3	--	--	--	5.6		0.059	700,000	NC	3,500,000	NC	160	--	fail	pass	5,100	--	fail	pass
Nitrobenzene	98-95-3	D036	40	2	14		0.068	70,000	NC	350,000	NC	--	--	--	--	--	--	--	
N-Nitrosodi-N-Propylamine	621-64-7	--	--	--	14		0.4	1,900	C	13,000	C	--	--	--	--	--	--	--	
N-Nitrosodiphenylamine	86-30-6	--	--	--	13		0.92	2,700,000	C	18,000,000	C	0.95	--	pass	pass	--	--	--	
o-Cresol (12)	95-48-7	D023	4,000	200	5.6		0.11	1,800,000	NC	8,800,000	NC	5.4	pass	pass	pass	--	--	--	
p-Cresol (12)	106-44-5	D025	4,000	200	5.6		0.77	3,500,000	NC	18,000,000	NC	--	--	--	--	--	--	--	
Pentachlorophenol	87-86-5	D037	2,000	100	7.4		0.089	33,000	C	220,000	C	0.58	pass	pass	pass	--	--	--	
Phenanthrene	85-01-8	--	--	--	5.6		0.059	56	10X UTS	1	10X UTS	20	--	fail	pass	--	--	--	
Phenol	108-95-2	--	--	--	6.2		0.039	11,000,000	NC	53,000,000	NC	210	--	fail	pass	--	--	--	
Pyrene	129-00-0	--	--	--	8.2		0.067	1,100,000	NC	11,000,000	NC	3.8	--	pass	pass	--	--	--	
Polychlorinated Biphenyls (PCBs) by 3550B/8082																			
Arochlor-1016	12674-11-2	--	--	--	--		--	2,500	NC	--	--	14	--	--	pass	4.3	--	--	pass
Arochlor-1242	53469-21-9	--	--	--	--		--	--	--	--	--	0.11	--	--	--	--	--	--	
Arochlor-1248	12672-29-6	--	--	--	--		--	--	--	--	--	7.2	--	--	--	--	--	--	
Arochlor-1254	11097-69-1	--	--	--	--		--	6,600	C	--	--	27	--	--	pass	--	--	--	
Arochlor-1260	11096-82-5	--	--	--	--		--	6,600	C	--	--	11	--	--	pass	--	--	--	
Total PCBs (13)	1336-36-3	--	--	--	10		0.1	6,600	C	44,000	C	--	--	--	--	--	--	--	
Flash Point SW1010																			
Flash Point	--	D001	--	<140 °F	--	--	--	--	--	--	--	--	--	--	--	100 °F	Ignitable	fail	fail

Notes:

- No value.
- RCRA Toxicity Characteristic Waste.
- 1 RCRA LDR UTS.
- 2 PHC is based on the lower of cancer and noncancer MTCA Method C values adjusted for a 10⁻³ cancer risk and a 10x RFD noncancer risk. For compounds without a MTCA C value, 10X UTS is used.
- 3 Except for Metals (EP or TCLP) and Cyanides (Total and Amenable) the Nonwastewater treatment standards expressed as a concentration were established, in part, based upon incineration in units operated in accordance with the technical requirements of 40 CFR part 264, subpart O or 40 CFR part 265, subpart O, or based upon combustion in fuel substitution units operating in accordance with applicable technical requirements. A facility may comply with these treatment standards according to provisions in 40 CFR 268.40(d). All concentration standards for nonwastewaters are based on analysis of grab samples.
- 4 Concentration standards for wastewaters are expressed in mg/L and are based on analysis of composite samples.
- 5 From NAPL samples collected June 27, 2017, July 10 2017, and May 14, 2018. Nondetect results are shown at the max detection limit for samples.
- 6 Cadmium value shown is for soil and nonpotable surface water MTCA Method C adjusted for a 10⁻³ cancer risk and a 10x RFD noncancer risk.
- 7 Chromium value shown is based upon for hexavalent chromium noncancer value for MTCA Method C adjusted for a 10x RFD noncancer risk.
- 8 Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using Method 9010C or 9012B, found in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, as incorporated by reference in 40 CFR 260.11, with a sample size of 10 grams and a distillation time of
- 9 These constituents are not "underlying hazardous constituents" in characteristic wastes, according to the definition at 40 CFR 268.2(i).
- 10 Lead and mercury values are based upon MTCA Method A Industrial values adjusted for a 10⁻³ cancer risk and a 10x RFD noncancer risk.
- 11 This constituent is not an underlying hazardous constituent as defined at 40 CFR 268.2(i) of this Part because its UTS level is greater than its toxicity characteristic level, thus a treatment selenium waste would always be characteristically hazardous, unless it is treated to below its characteristic level.
- 12 If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used.
- 13 This UTS standard is temporarily deferred for soil exhibiting a hazardous characteristic due to D004-D011 only.

Abbreviations:

- C Cancer value
- CAS Chemical Abstracts Service
- °F Degrees Fahrenheit
- LDR Land Disposal Regulation
- mg/kg Milligrams per kilogram
- mg/L Milligrams per liter
- MTCA Model Toxics Control Act
- NAPL Non-aqueous phase liquid
- NC Noncancer
- PHC Principal Hazardous Constituent
- RCRA Resource Conservation and Recovery Act
- TCLP Toxicity Characteristic Leaching Procedure
- UTS Universal Treatment Standard

**Table C.2
Atmospheric, Visual, and HazCat Analysis to Identify Preliminary Profile Group**

Parameter	Initial Assessment Method	Rationale for Selection	Result	Next Steps
Visual and Area Air Monitoring Assessment				
Chemical Hazards	4-gas meter and PID screen	Used to detect the presence of organic vapors or combustible gases		Segregate non-conforming waste. If waste is conforming, perform HazCat then follow analytical procedure for applicable reference profile in Table C.3.
Radioactivity Screen	Alpha/beta radiation scan Gamma radiation dose survey	Used to help identify prohibited wastes.		Segregate non-conforming waste. If waste is conforming, perform HazCat then follow analytical procedure for applicable reference profile in Table C.3.
Physical Description	Visual inspection	Determine the general characteristics of the waste stream. Ensure correct grouping of wastes for sampling. Determine the percentages of the various material types in debris-like wastes. Identify if waste fits a reference profile or may be non-conforming waste (e.g., drums with labels or distinctive marking, lab packs). ZCS is anticipated to be identifiable by its weight. Visual indicators may be used to identify paint waste (e.g. brushes, masking tape, pigments).	Solids Debris Liquid Sludge ZCS	Segregate non-conforming waste. If waste is conforming, perform HazCat then follow analytical procedure for applicable reference profile in Table C.3.
HazCat® to Identify Ignitable, Corrosive, or Reactive Wastes⁽¹⁾				
pH	pH test strips or calibrated meter	Used to determine the corrosivity of the waste to ensure proper storage and coding of the waste.	pH <2.5 or >13.5	Follow laboratory analytical procedure for acidic or alkaline waste reference profile in Table C.3.
Water Reactivity	Reactive in water by visual observation	Used to determine whether the waste has a potential to react with water to generate heat, flammable gases, or other products. It is also used to identify D003 (Reactivity) characteristic wastes.	Reacts	Follow laboratory analytical procedure for non-conforming waste in Table C.3.
Reactive Sulfides Screen	Lead acetate spot test	Used to indicate whether the waste produces hydrogen sulfide upon acidification. This information is necessary in order to avoid storage and mixing incompatibilities. It is also used to help identify D003 (Reactivity) characteristic wastes.	Positive	Follow laboratory analytical procedure for non-conforming waste in Table C.3.
Reactive Cyanide Screen	Cyanide spot test	Used to indicate whether the waste produces hydrogen cyanide upon acidification. This information is necessary in order to avoid storage and mixing incompatibilities. It is also used to identify D003 (Reactivity) characteristic wastes.	Positive	Follow laboratory analytical procedure for non-conforming waste in Table C.3.
Ignitability	Closed cup tester (liquids only)	Indicates the susceptibility of the waste to be ignited. This information is necessary in order to avoid placement of the waste in inappropriate areas. It is also used to identify D001 characteristic wastes.	Ignites	Follow laboratory analytical procedure for ignitable liquids reference profile in Table C.3.
Oxidizer Screen	Oxidizer test paper	A general qualitative test used to determine whether a waste is an oxidizer. Oxidizers have the potential to react with a wide range of waste streams and, therefore, often need to be segregated. It is also used to identify D001 (Ignitability) characteristic wastes.	Positive	Follow laboratory analytical procedure for non-conforming waste in Table C.3.
Other Potentially Useful HazCat Tests⁽²⁾				
PCBs	HazCat Chlor-N-Oil 50	To segregate liquid wastes for incineration that may contain PCBs.		PCBs by USEPA SW846 Method 8082
Chlorine	HazCAT Copper Wire Test	To segregate wastes for incineration that may contain chlorinated pesticides, herbicides, or other chlorinated solvents that would impact disposal pricing.		Total Organic Halides (TOX) by USEPA SW-846 Test Method 9020B Pesticides/Herbicides by USEPA SW846 Method 8081/8051 VOCs by USEPA SW846 Method 8260
Organophosphate Pesticides	HazCat Organophosphate Quick Test	To screen wastes to determine whether additional lab analysis is warranted for phosphate-based pesticides/herbicides.		Pesticides/Herbicides by USEPA SW846 Method 8081/8051

Notes:

- 1 If wastes are conforming, follow laboratory analytical procedure in Table C.3 for appropriate reference profile.
- 2 As the work progresses, onsite HazCat methods may be used to group waste for profiling and subsequent laboratory analysis. The ability to use onsite HazCat methods will depend on the requirements of the TSDF, the types of waste encountered, and the reliability of onsite methods to screen wastes, as confirmed by SW-846 methods.

Abbreviations:

- HazCat Hazard Categorization
- PCB Polychlorinated biphenyl
- PID Photoionization detector
- TSCA Toxic Substances Control Act
- TSDF Treatment, storage, and disposal facility
- VOC Volatile organic compound
- ZCS Zircon casting sands

**Table C.3
Laboratory Analysis for Waste Profiling**

Reference Profile ⁽¹⁾	Parameter for Laboratory Analysis	Laboratory Test Method ⁽²⁾	Testing Frequency ⁽³⁾	Offsite TSDF Disposal and Treatment	WM Arlington Reference Profile Number	US Ecology Grand View Reference Profile Number
CAMU-Eligible Disposal - Direct Landfill in offsite permitted hazardous waste TSDF						
CAMU-Eligible Hazardous Solids, Debris	Organic and Inorganic PHCs	Focused analytical testing based on HazCat results	1 per 16 to 20 similarly grouped drums, or every rolloff	Direct Landfill in offsite permitted hazardous waste TSDF	OR 344989	Profile 2a and 2b
Zircon Casting Sand	Radioactivity	Method varies by TSDF ⁽⁴⁾	1 per 16 to 20 similarly grouped drums, or every rolloff	Not Anticipated to be RCRA Hazardous. Direct Landfill in offsite permitted hazardous waste TSDF	OR 345089	Profile 1
	Corrosivity (pH)	SW846 Method 9040/9045				
	Metals	USEPA Method 6010/7470				
CAMU-Eligible Disposal - Treatment at offsite TSDF followed by Landfill in permitted hazardous waste TSDF ⁽⁵⁾						
CAMU-Eligible Hazardous Liquids Sludges and Semisolids	Presence of free liquids	Paint filter test by SW-846 Test Method 9095B	As needed	Offsite TSDF to solidify liquids and sludges and landfill in permitted hazardous waste landfill	OR 344981	Profile 3a and 3b
	Organic and Inorganic PHCs	Focused analytical testing based on HazCat results	1 per 16 to 20 similarly grouped drums, or every rolloff			
Acidic Liquids Sludges and Semisolids	Corrosivity (pH)	SW846 Method 9040/9045	1 per 16 to 20 similarly grouped drums, or every rolloff	Offsite TSDF to neutralize corrosivity, solidify liquids and sludges, and landfill in permitted hazardous waste TSDF	OR 344979	Profile 3c
	Presence of free liquids	Paint filter test by SW-846 Test Method 9095B	As needed			
	Organic and Inorganic PHCs	Focused analytical testing based on HazCat results	1 per 16 to 20 similarly grouped drums, or every rolloff			
Alkaline Liquids Sludges and Semisolids	Corrosivity (pH)	SW846 Method 9040/9045	1 per 16 to 20 similarly grouped drums, or every rolloff	Offsite TSDF to neutralize corrosivity, solidify liquids and sludges, and landfill in permitted hazardous waste TSDF	OR 344980	Not Available
	Presence of free liquids	Paint filter test by SW-846 Test Method 9095B	As needed			
	Organic and Inorganic PHCs	Focused analytical testing based on HazCat results	1 per 16 to 20 similarly grouped drums, or every rolloff			
Non-CAMU Disposal						
Flammable Liquids - RCRA ⁽⁶⁾	Ignitability	SW846 Method 1020	1 per 16 to 20 similarly grouped drums	RCRA Hazardous Waste —Incinerate with treatment to Land Disposal Restrictions	OR 345090	Profile 6d
	Metals	USEPA Method 6010/7470	1 per 16 to 20 similarly grouped drums			
	PCBs	USEPA Method 8082	1 per 16 to 20 similarly grouped drums			
	Total Organic Halides (TOX)	USEPA SW-846 Test Method 9020B	1 per 16 to 20 similarly grouped drums			
Other Non-Conforming Waste ⁽⁷⁾	VOCs	USEPA Method 8260B	1 per 16 to 20 similarly grouped drums, or every rolloff	Unknown - dependent upon waste encountered	Not Available	Not Available
	SVOCS	USEPA Method 8270D				
	Metals	USEPA Method 6010/7470				
	Pesticides	USEPA Method 8081				
	Herbicides	USEPA Method 8151				
	PCBs	USEPA Method 8082				
	Leachable VOCs, SVOCS, metals, and pesticides/herbicides	TCLP extraction by USEPA Method 1311, additional analysis as indicated above				

- Notes:
- Drums are separated by physical properties, then by HazCat to identify Reference Profile; refer to Table C.2.
 - Laboratory testing parameters will be performed as required by the TSDF. CAMU-eligible waste will be subject to limited laboratory analytical based on discussion with both offsite TSDFs. Focused analytical testing will be performed for CAMU-eligible waste to identifying unknowns within the waste streams, (e.g. organic containing drums that are not visually identifiable as paint waste may require laboratory analytical to determine waste type).
 - At the start of drum removal activities, drums will be analyzed at a frequency of 1 per 16 to 20 similarly grouped drums, or every rolloff. As the work progresses, site knowledge and the use of additional onsite waste visual and HazCat methods will be used to reduced analytical frequency, assuming similar waste types are
 - Laboratory analysis for Alpha Spectroscopy or Isotopic U/Isotopic Th would be required to characterize ZCS waste for disposal at USEI Grandview; Laboratory analysis for gamma spectroscopy & gross alpha/beta would be required to characterize ZCS waste disposal at WM Arlington. Acceptance criteria is based on TSDF permits.
 - Reactive wastes are not anticipated to be encountered within Zone A, but would be identified by onsite HazCat Methods if present. If encountered, waste in this category could be profiled as CAMU eligible, with treatment by deactivation at the offsite TSDF and then landfilled within the permitted hazardous waste TSDF.
 - Apply codes that would be treated by incineration to profile without testing. Analyze for PCBs, metals, and chlorine, which impact treatment and disposal requirements and costs.
 - Other waste that does not meet TSDF acceptance criteria for disposal in a permitted hazardous waste TSDF would be profiled and disposed of in accordance with applicable state and federal standards. Waste in this category could include non-naturally occurring radioactive material waste, lab packs, reactive wastes, etc. If oxidizers or water reactivity are identified by onsite HazCat Methods, waste would be profiled and disposed of as non-conforming waste. If reactive cyanides or sulfides were encountered, waste in this category could be disposed of as CAMU eligible, with treatment by deactivation at the offsite TSDF and then landfilled within the permitted hazardous waste TSDF. Identified test parameters and methods are based on known contaminants of concern within Zone A. Actual analytical requirements will depend on the waste encountered.

Abbreviations:

CAMU Corrective Action Management Unit	TCLP Toxicity Characteristic Leaching Procedure
HazCat Hazard Categorization	TSCA Toxic Substances Control Act
PCB Polychlorinated biphenyl	TSDF Treatment, storage, and disposal facility
PHC Principal Hazardous Constituent	VOC Volatile organic compound
RCRA Resource Conservation and Recovery Act	ZCS Zircon casting sands
SVOC Semivolatile organic compound	

**Table C.4
Potential Waste Disposal Facilities**

Facility	Location
TSDFs for CAMU-Eligible Hazardous Waste	
Arlington Chemical Waste Management	17629 Cedar Springs Lane Arlington, OR 97812
US Ecology Grand View	20400 Lemley Road Grand View, ID 83624
TSDFs for Waste Streams That Are Not CAMU-Eligible	
Hazardous Waste Requiring Incineration	
US Ecology Grand View/Veolia Incinerator, Texas ⁽¹⁾	20400 Lemley Road Grand View, ID 83624
Arlington Chemical Waste Management ⁽²⁾	17629 Cedar Springs Lane Arlington, OR 97812
Clean Harbors Aragonite Incineration Facility	11600 North Aptus Road Dugway, UT 84022
Non-Hazardous Solids	
Waste Management, Columbia Ridge Commercial Landfill	18177 Cedar Springs Lane Arlington, OR 97812
Republic Services, Roosevelt Regional Landfill	500 Roosevelt Grade Road Roosevelt, WA 99356
BDI Transfer Station	1721 Dietrich Road Pasco, WA 99301
Finley Buttes Landfill	73221 Bombing Range Road Boardman, OR 97818
Non-Hazardous Liquids (i.e., Construction Water)	
City of Pasco, Wastewater Treatment	1015 S. Gray Avenue Pasco, WA 99301
Recyclable Hazardous Liquids (i.e., Fuel Blending, if deemed applicable to the site)	
Stericycle Kent	20245 77th Ave. S Kent, WA
Stericycle Tacoma	1701 E. Alexander Ave. Tacoma, WA
Non-Hazardous Oily Liquids (if deemed applicable to the site)	
PRS Tacoma	3003 Taylor Way Tacoma, WA 98421
Emerald Services, Tacoma	1825 Alexander Ave. Tacoma, WA

Notes:

- 1 Waste for incineration will be shipped to US Ecology in Grand View, Idaho, where it will be temporarily stored pending shipment to Veolia for final incineration and disposal under a new outbound waste manifest. Generator certifications will be attached to each new outbound manifest, as appropriate.
- 2 Waste for incineration will be shipped to Arlington, Oregon, Chemical Waste Management, where it will be temporarily stored pending shipment to an offsite incineration TSDF for incineration and final disposal under a new outbound waste manifest. Generator certifications will be attached to each new outbound manifest, as appropriate.

Abbreviations:

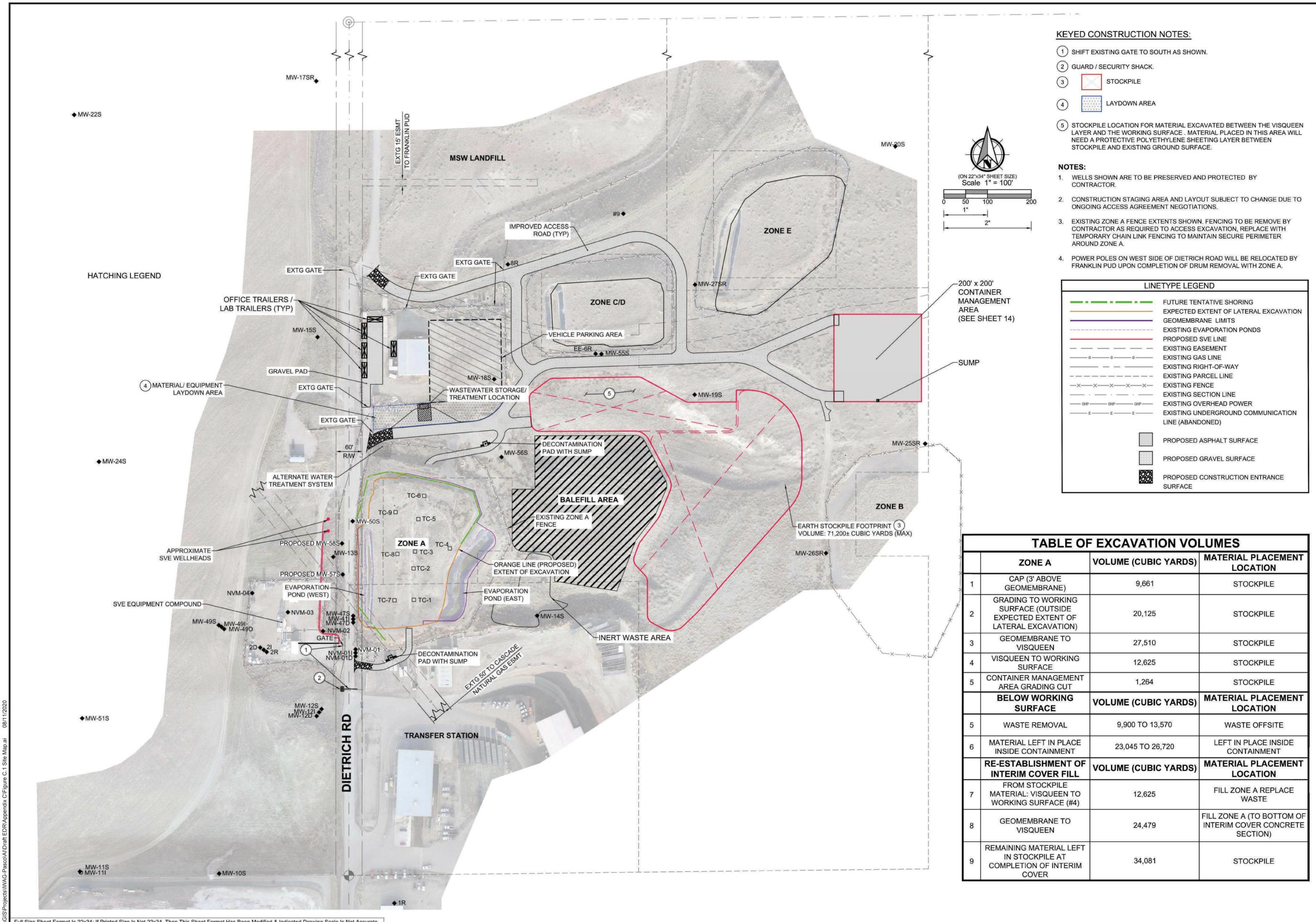
- CAMU Corrective Action Management Unit
- TSDF Treatment, storage, and disposal facility

Pasco Sanitary Landfill NPL Site
Zone A Removal Action
Engineering Design Report

Appendix C
Waste Handling, Characterization,
and Disposal Plan

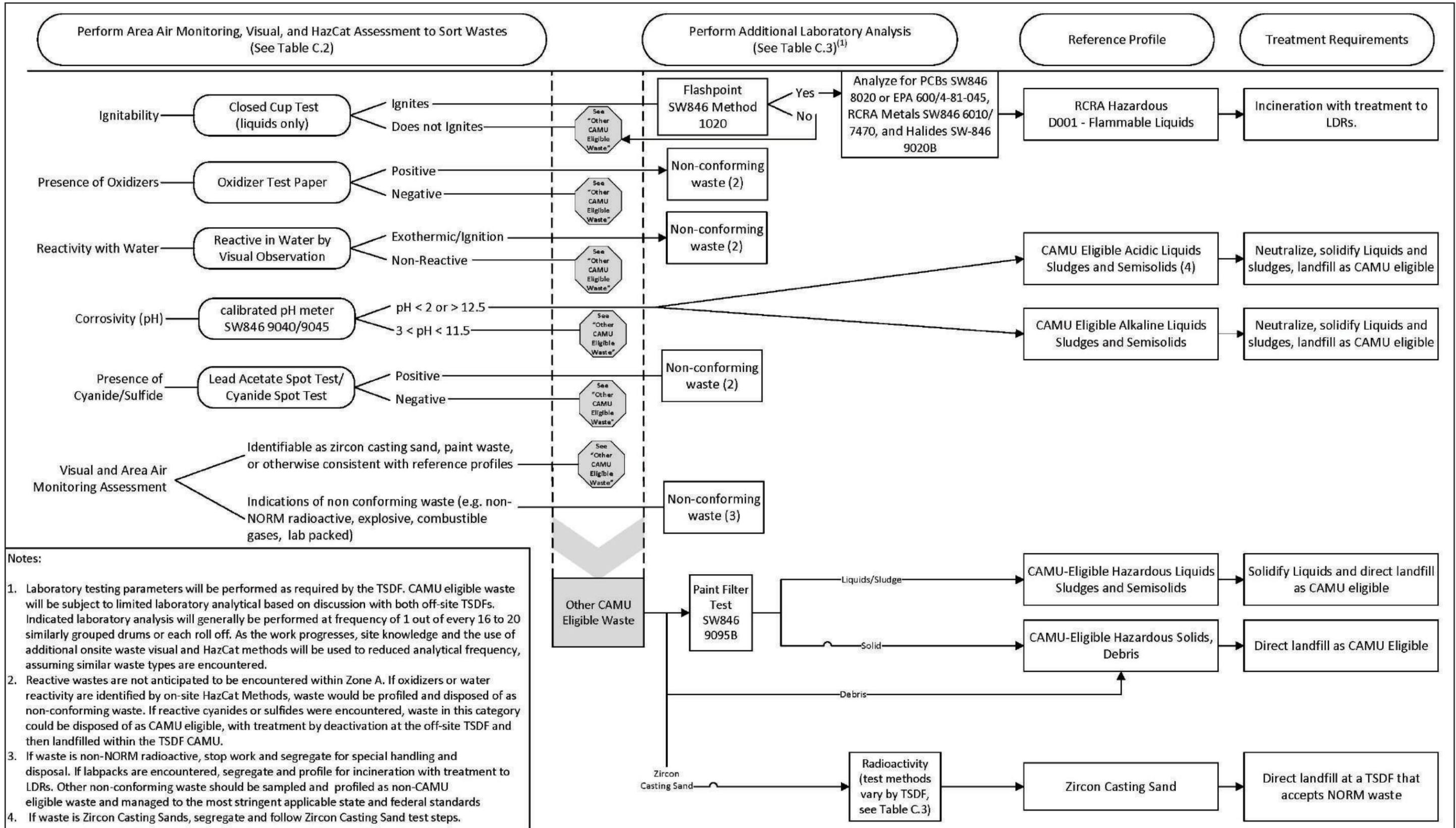
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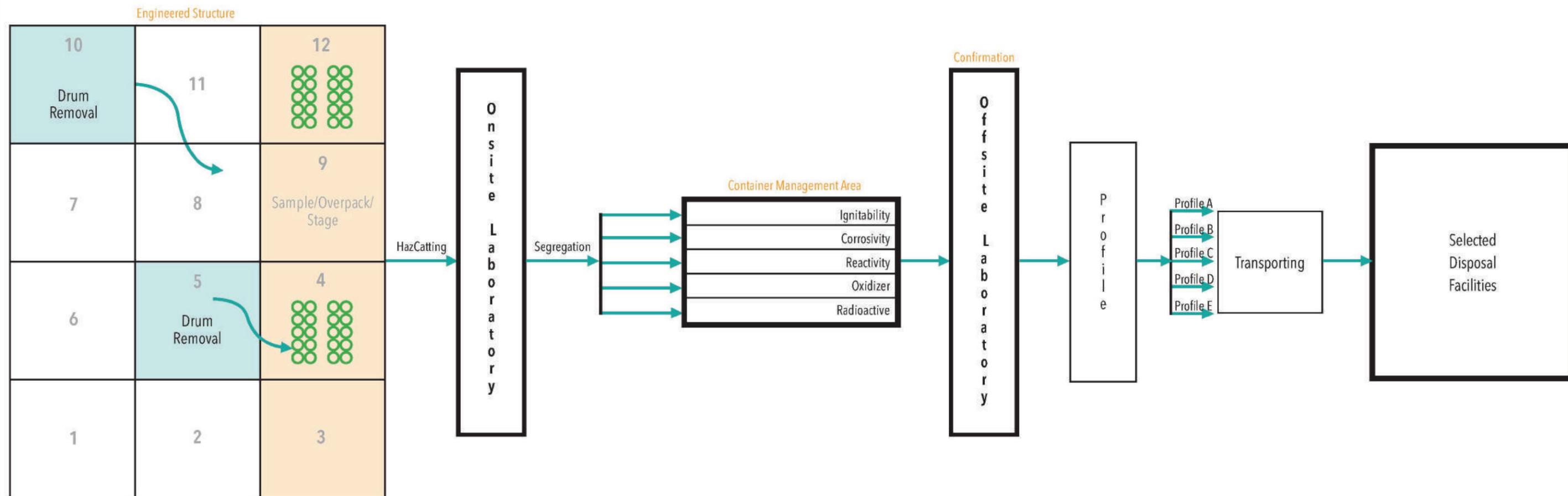
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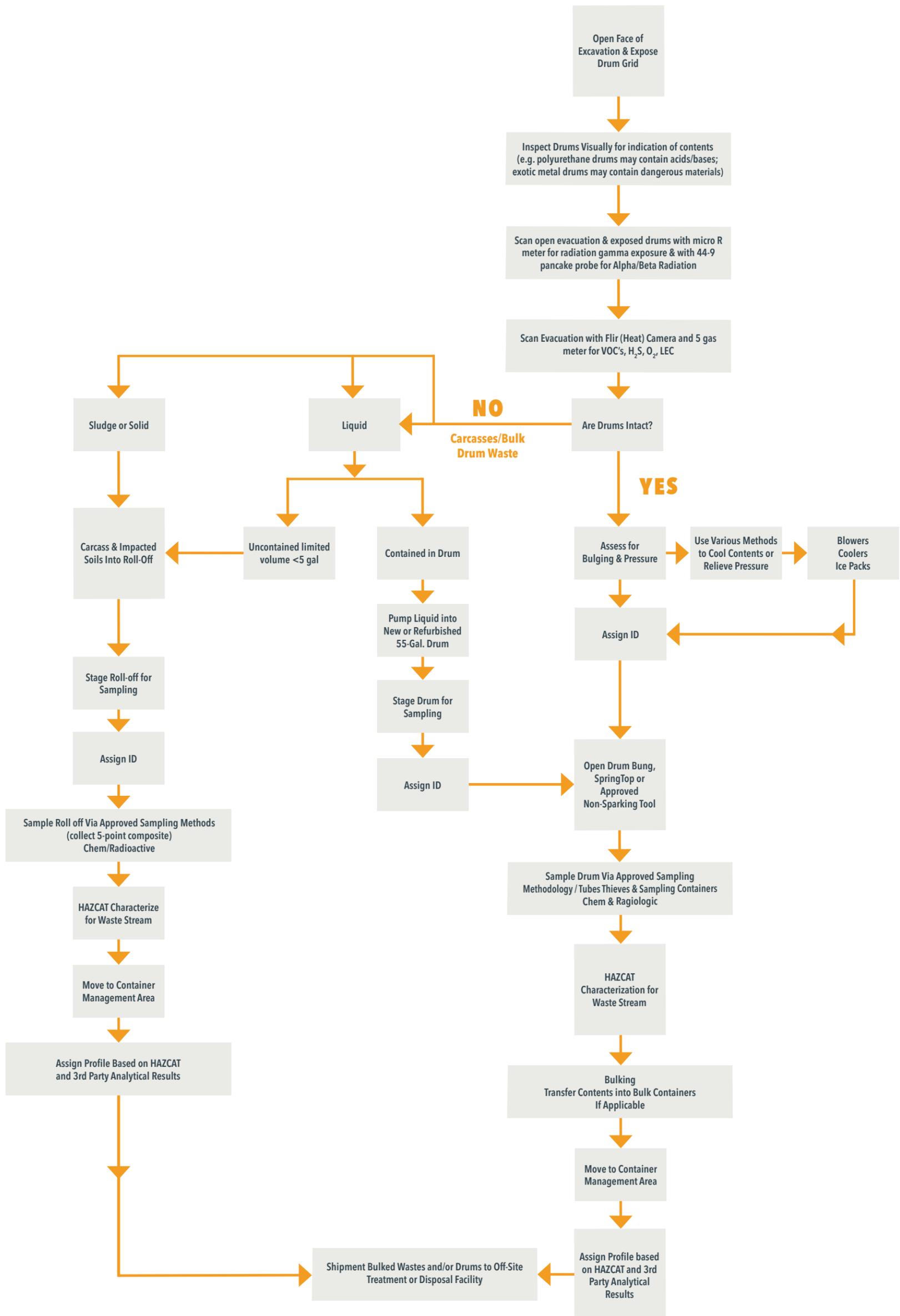
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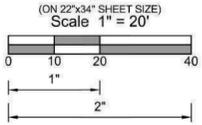
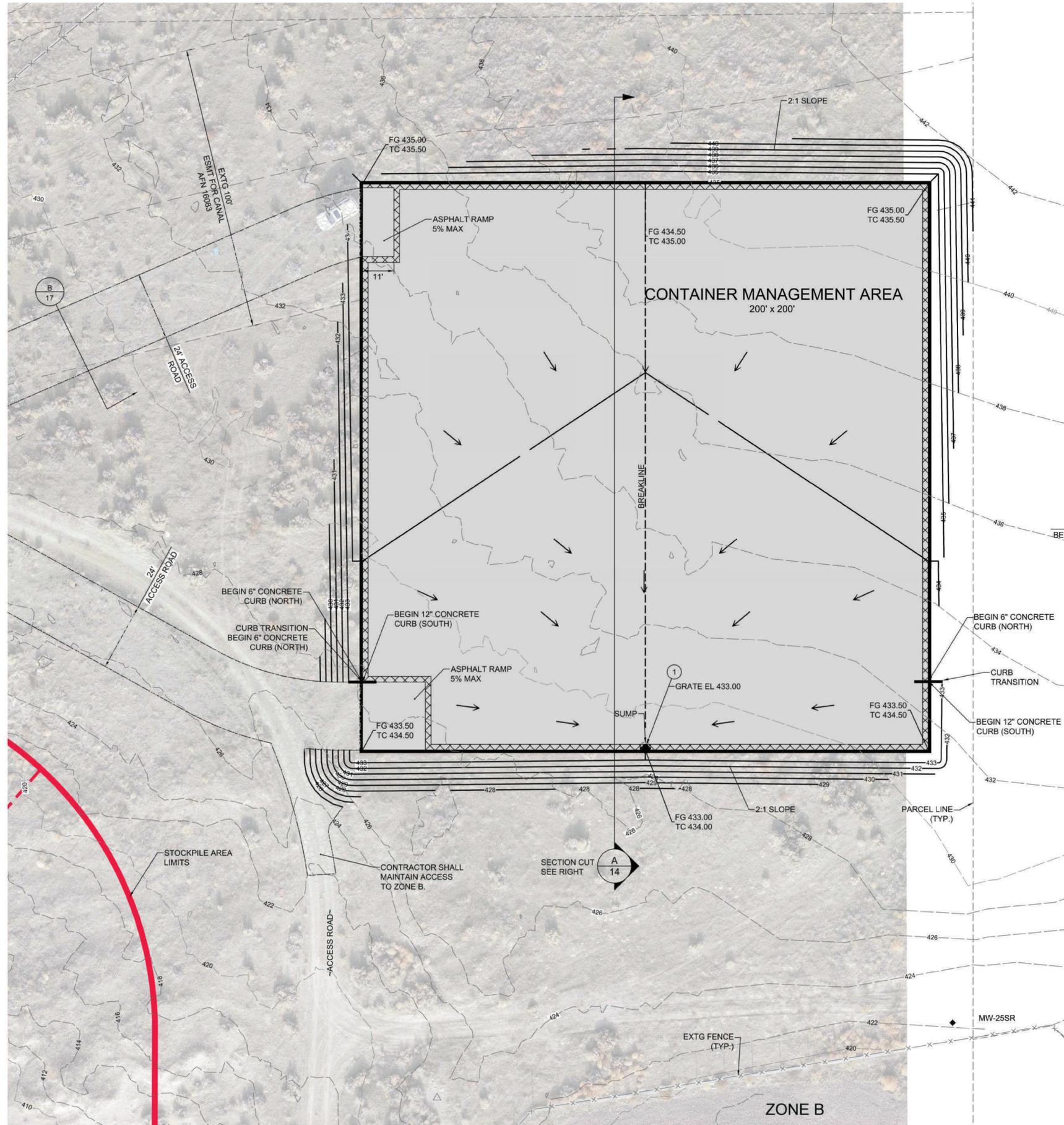


Source: ENTACT Proposal for Pasco Sanitary Landfill NPL Site

DRUM EXCAVATION FLOW CHART



DRUM EXCAVATION FLOW CHART, ENTACT PROPOSAL FOR PASCO SANITARY LANDFILL NPL SITE



KEYED CONSTRUCTION NOTES:

- 1 INSTALL 48" DIAMETER PRE-CAST MANHOLE WITH RECTANGULAR VANED GRATE PER WSDOT STD. PLAN B-30.30-03, H20 TRAFFIC RATED GRATE, 4' BARREL HEIGHT WITH FLAT TOP LID. SEE SHEET 18, FOR DETAILS.

LINETYPE LEGEND	
	EXISTING EASEMENT
	EXISTING PARCEL LINE
	EXISTING FENCE
	PROPOSED INDEX CONTOUR
	PROPOSED MINOR CONTOUR
	EXISTING INDEX CONTOUR
	EXISTING MINOR CONTOUR
	PROPOSED WATER FLOW
	LIMITS OF CONTAINER MANAGEMENT AREA
	PROPOSED ASPHALT SURFACE
	PROPOSED GRAVEL SURFACE

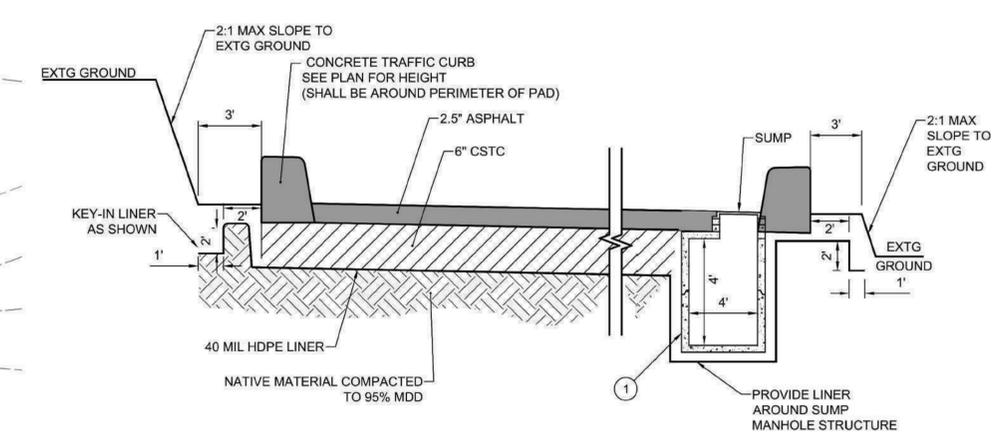
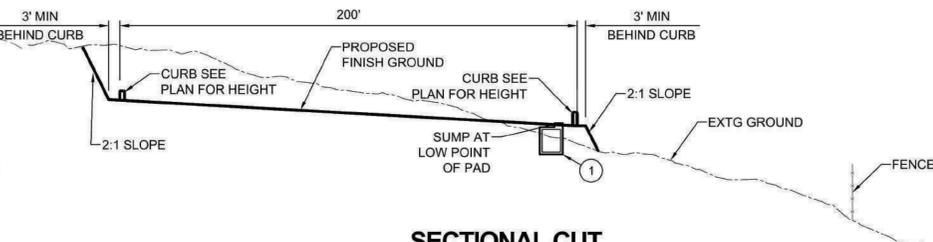


Figure C.5
Waste Container Management
Area Plan with Cross Sections

Pasco Sanitary Landfill NPL Site

Zone A Removal Action

Engineering Design Report

Appendix C

Waste Handling, Characterization,

and Disposal Plan

Attachment C.1

Offsite TDSF Permits and

Reference Profiles

DRAFT FINAL

WM Arlington Permit



HAZARDOUS WASTE PERMIT

FOR THE
STORAGE, TREATMENT, AND
DISPOSAL OF
HAZARDOUS WASTE



State of Oregon
Department of
Environmental
Quality

Issued in accordance with the applicable provisions of ORS Chapter 466 and the regulations promulgated at OAR Chapter 340 Divisions 100 through 120, and, the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), and the regulations promulgated at Title 40 of the Code of Federal Regulations as adopted into Oregon Rules by OAR 340-100-0002.

This Permit is effective as of August 21, 2006, and shall remain in effect until August 21, 2016, unless revoked and reissued (40 CFR §270.41), terminated (40 CFR §270.43), or continued in accordance with OAR 340-105-0051.

ISSUED TO:

Chemical Waste Management of the Northwest, Inc.
17629 Cedar Springs Lane
Arlington, OR 97812
Telephone: (541) 454-2643

ISSUED BY:

Lynn Hampton, Chair
Oregon Environmental Quality Commission

8/10/06
Date

Joni Hammond, Regional Administrator
Eastern Region

8-10-06
Date

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INTRODUCTION

Permittee: Chemical Waste Management of the Northwest, Inc.

Environmental Protection Agency Identification Number: ORD 089 452 353

Pursuant to Oregon Revised Statutes Chapter 466 and the hazardous waste rules promulgated by the Oregon Environmental Quality Commission in Chapter 340 of the Oregon Administrative Rules (OAR), and, pursuant to the Solid Waste Disposal Act (42 U.S.C. 3251 et seq.), as amended by the Resource Conservation and Recovery Act of 1976 [42 U.S.C. 6901 et seq., (RCRA)] and the Hazardous and Solid Waste Amendments of 1984 (HSWA) and regulations promulgated by the U.S. Environmental Protection Agency (Agency) in Title 40 of the Code of Federal Regulations, this Permit is issued to Chemical Waste Management of the Northwest, Inc. (Permittee), to operate a hazardous waste treatment, storage, and disposal Facility located in Gilliam County near Arlington, Oregon, on Cedar Springs Road at latitude 45° 37' 30" and longitude 120° 22' 30".

The Permittee shall comply with all Terms and Conditions set forth in this Permit and with documents referenced in this Permit. Some of these documents are defined and referenced as “standalone documents”, “referenced standalone documents”, or shortened as “documents”. The Permittee shall comply with all applicable state rules, including OAR 340 Divisions 100-120, and the rules of the Oregon Department of Transportation, the Oregon Department of Water Resources, the Workers' Compensation Department, the Oregon State Health Division, and other state agencies having jurisdiction over the Facility. Additionally, the Permittee shall comply with all applicable federal regulations in 40 CFR Parts 260 through 266, Part 268, and Part 270, as adopted by Oregon rule at OAR 340-100-0002.

In some cases, within the Permit and the referenced standalone documents, the Department has included references to other documents which are not physically contained in this Permit or the referenced standalone documents. In such cases, the Permittee shall still comply with the procedures of those referenced documents, even though they are not physically contained in this Permit, to the extent necessary to remain in compliance with the conditions of this Permit and referenced standalone documents. The Permittee shall maintain a set of such referenced documents at the Facility.

The Department's issuance of this Permit is based upon the administrative record. The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts, or the Permittee's misrepresentation of any relevant facts at any time, shall be grounds for the termination of this Permit and/or initiation of an enforcement action, including criminal proceedings. Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in the permit application or in any report to the Department, the Permittee shall promptly submit such facts or corrected information to the appropriate persons.

The Department shall enforce all Conditions of this Permit. Other state agencies having jurisdiction over the Facility shall exclusively enforce the requirements of their rules. ‡ **Rev. 1**

The first RCRA hazardous waste permit for the Facility was originally issued on March 11, 1988, by the Oregon Environmental Quality Commission, the Oregon Department of Environmental Quality, and the U.S. Environmental Protection Agency. The Permittee submitted a Permit renewal Part A and B application in March 1998. The Department has reviewed the renewal application and issued a draft hazardous waste storage, treatment, and disposal Permit for public comment. The draft hazardous waste Permit was issued for comment on February 22, 2006. The final Permit decision will be made by the Environmental Quality Commission and the Department of Environmental Quality. See ORS 466.140, 466.145, and 466.015.

This Permit may be modified in accordance with 40 CFR 270.40 (as amended by OAR 340-105-0040), 40 CFR 270.41 (as amended by OAR 340-105-0041), and 40 CFR 270.42.

Issuance of this Permit shall terminate the hazardous waste permit issued in March 1988 and its subsequent modifications.

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LIST OF STANDALONE DOCUMENTS

The following documents are incorporated, in their entirety, by reference into this hazardous waste Permit. Their structure and most of the content comes from the Permittee's RCRA 1998 Permit renewal application and from previous Department approved modifications to the hazardous waste permit which was first issued in March 1988. In cases where there are inconsistencies between this Permit and a standalone document, the Permit supersedes the standalone document. In some cases, the Department has altered specific language in the standalone documents by adding Permit Conditions and/or changing language in the standalone documents. Alterations as described in the Permit Conditions found in this Permit supersedes the language of the standalone document. These incorporated documents, as modified by specific Permit Conditions are enforceable conditions of this Permit.

Standalone

Document 1 Waste Analysis Plan, administrative record no. 06074.

Standalone

Document 2 Security Procedures, Hazard Prevention, Training Plan, administrative record no. 06075.

Standalone

Document 3 Inspection Plan, administrative record no. 06076.

Standalone

Document 4 Contingency Plan, administrative record no. 06077.

Standalone

Document 5 Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance, administrative record no. 06078.

Standalone

Document 7 Groundwater Monitoring Plan, administrative record no. 06080.

Standalone

Document 8 Bulk Liquid Storage/Treatment Plan, administrative record no. 06081.

Standalone

Document 9 Container Storage Design and Operations Plan, administrative record no. 06082.

Standalone

Document 10 Stabilization/Chemical Treatment Plan, administrative record no. 06083.

Standalone

Document 11 Debris Treatment Plan, administrative record no. 06084.

Standalone

Document 12 Containment Building Design and Operations Plan, administrative record no. 06085.

Standalone

Document 13 Surface Impoundments Design and Operations Plan, Response Action Plan, administrative record no. 06086.

Standalone

Document 14 Landfill Design and Operations Plan, administrative record no. 06087.

Standalone

Document 15 Landfill Response Action Plans, administrative record no. 06088.

Standalone

Document 16 Construction Quality Assurance Plan, administrative record no. 06089.

Standalone

Document 17 Landfill Final Cover Design Plan, administrative record no. 06090.

Standalone

Document 18 Landfill Design Drawings, administrative record no. 06091.

Standalone

Document 19 Bioremediation Facility and Organic Recovery Unit Design and Operations Plan, administrative record no. 06092. ‡ **Rev. 12**

Standalone

Document 20 PCB Operations Plan, administrative record no. 06093.

Standalone

Document 21 Waste Piles Plan, administrative record no.06092. ‡ **Rev. 23**

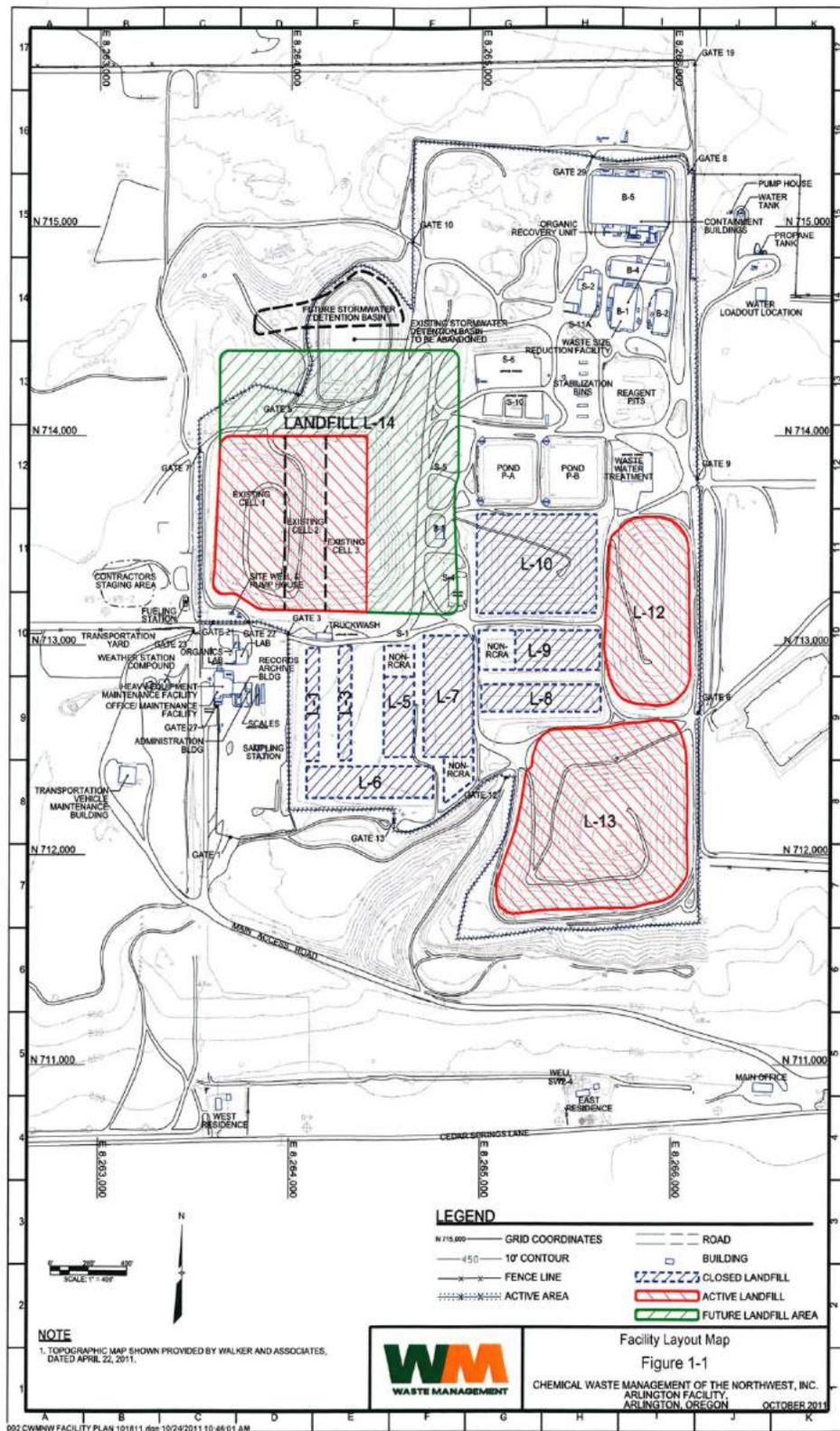
DEFINITIONS

For this hazardous waste Permit, the following definitions shall apply:

- a. The term "Administrator" shall mean the Administrator of the United States Environmental Protection Agency (EPA) or a designated representative. The Director, Office of Air, Waste, and Toxics, EPA Region 10, is a duly authorized and designated representative of the Administrator for purposes of this Permit.
- b. The term "Agency" shall mean the United States EPA Region 10.
- c. The abbreviation "A.R. (no.)" shall mean the administrative record index number for a specific document.
- d. The term "Commission" shall mean the Oregon Environmental Quality Commission.
- e. The term "daily" shall mean only those days which the Permittee considers to be regular workdays which shall include Monday through Friday excluding holidays. In the event of a full temporary facility shutdown or a holiday combined with extra days, no more than 72 hours shall elapse between inspections listed at a frequency of "normal working day" or "daily." For partial temporary shutdown where employees do arrive at the facility and can perform duties in accordance with the Permit, such duties shall be performed during partial temporary shutdown.
- f. The term "Department" shall mean the Oregon Department of Environmental Quality (DEQ).
- g. The term "Director" shall mean the Director of the Oregon Department of Environmental Quality or a designated representative. By Department delegation all notifications and approvals assigned to the Director are delegated to the Eastern Region Hazardous Waste Program Manager ("Manager").
- h. The term "Eastern Region Clean-up Manager" shall mean the Manager implementing the authority of ORS 465 in the Department's Eastern Region.
- i. The terms "Facility" or "Site" shall mean the legal description of the Chemical Waste Management of the Northwest, Inc., property (including structures, appurtenances, and improvements) used to store, to treat or to dispose hazardous waste as authorized by this Permit. For purposed of Permit Condition I.N., "permitted Facility" shall also include significant physical alterations not otherwise detailed in this Permit.
- j. The term "Inspector" shall mean the designated representative of the "Manager" delegated to routine Facility oversight.
- k. The term "Manager" shall mean the Manager of the DEQ Eastern Region Hazardous Waste Program.
- l. The term "Permit" shall mean the Permit issued by the Commission and the Department pursuant to ORS 340 Divisions 105 and 106.
- m. The term "standalone document" or "referenced standalone document" shall mean those documents listed in the List of Standalone Documents in this Permit.

- n. The term “within [x] days of the effective date of this Permit” shall mean within [x] calendar days after the effective date of this Permit. If the date within [x] amount of days after the effective date of this Permit falls on a weekend or holiday, the time shall automatically be extended until the following regular workday.
- o. In cases where the Permittee is required to comply with a specific provision of 40 CFR Part 264 and that provision refers to "Regional Administrator" or "Director", the term "Regional Administrator" or "Director" shall be interpreted to mean the Manager, Eastern Region Hazardous Waste Program.
- p. All definitions contained in 40 CFR Parts 260 through 270, and, OAR 340 Divisions 100 through 106 and 120 are hereby incorporated, in their entirety, by reference into this Permit, except that any of the definitions used above, (a) through (o), supersede any definition of the same term in 40 CFR 260.10, 270.2, 264.141, and OAR 340-100-0010. Where a term is not defined in the Permit, regulations or rules, the term is defined according to the standard dictionary definition or the generally accepted scientific or industrial meaning of the term.

Figure 1-1 Facility Layout Map



I. STANDARD CONDITIONS

I.A. Effect of Permit

The Permittee is authorized to store, treat, and dispose hazardous waste in accordance with the Conditions of this Permit and in accordance with 40 CFR 262.34. Any storage, treatment, or disposal of hazardous waste by the Permittee at this Facility that is not authorized by this Permit or by 40 CFR 262.34, and for which a Permit is required under Section 3005 of RCRA and ORS 466.095 and 466.100 is prohibited.

I.B. Personal and Property Rights

This Permit does not convey any property rights of any sort, or any exclusive privilege, nor does this Permit authorize any injury to persons or property or invasion of other private rights, or any infringement of State or local laws or regulations.

I.C. Permit Actions

I.C.1.

This Permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, 270.43 and OAR 340 Divisions 105 and 106. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition. [40 CFR 270.30(f)]

I.C.2.

Except as provided by specific language in this Permit, any modification or change in design or operation of this Facility or in a hazardous waste management practice covered by the Permit shall be done in accordance with 40 CFR 270.41 and 270.42, unless a change in accordance with Permit Condition II.R. is appropriate.

I.C.3. [Reserved]

I.D. Severability

I.D.1.

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision, which forms the basis for any Condition of this Permit, does not affect the validity of any other state or federal statutory or regulatory basis for said Condition.

I.D.2.

In the event that a condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the related applicable and relevant conditions in the previously-expired permit until final resolution of the stayed condition unless compliance with the related applicable and relevant conditions in the previously-expired permit would be technologically incompatible with compliance with other Conditions of this Permit, which have not been stayed.

I.E. Duty to Comply

I.E.1.

The Permittee shall comply with all Conditions of this Permit, except that the Permittee need not comply with the Conditions of this Permit to the extent and for the duration such noncompliance is authorized in an emergency Permit [issued under 40 CFR 270.61, OAR 340-105-0061, or ORS 466.095(3)]. Any Permit noncompliance, except under the terms of an emergency Permit, constitutes a violation of the applicable provision of Oregon State law and/or RCRA, as amended by HSWA, and is grounds for enforcement action, Permit termination, modification or revocation and reissuance of the Permit, or denial of a Permit renewal application.

I.E.2.

Compliance with the terms of the Permit does not constitute a defense to any action brought under ORS 466.180, 466.185, 466.190, 466.200, 466.210, 466.225, or 465, or Sections 3007, 3008, 3013 and 7003 of RCRA (42 U.S.C. 6934 and 6973), Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) [42 U.S.C. 9606(a)], as amended by the Superfund Amendments and Reauthorization Act of 1986, or any other federal or state law governing protection of public health or the environment from any imminent and substantial endangerment to human health or the environment. Specific exclusions from compliance with this Permit are found at 40 CFR 270.4.

However, compliance with the terms of this Permit does constitute a defense to any action alleging failure to comply with the applicable law upon which this Permit is based. ‡ **Rev. 3**

I.F. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee shall apply for and obtain a new permit, in accordance with 40 CFR 270.30(b). The Permittee shall submit such permit application at least 180 calendar days prior to the expiration date of this Permit, unless the Manager has granted permission for a later date (but no later than the expiration date of the existing Permit) in accordance with 40 CFR 270.10(h).

I.G. Continuation of Expiring Permit

This Permit, all Conditions herein and the standalone documents shall continue in force until the effective date of a new Permit if the Permittee has submitted a timely, complete application (under 40 CFR 270 Subpart B and OAR Chapter 340 Division 105), and, through no fault of the Permittee, the Manager, the Administrator, or the Commission does not issue a new Permit under 40 CFR 124.15 on or before the expiration date of the previous Permit. In accordance with 40 CFR 270.50, this Permit shall be reviewed five years after the effective date and modified, as necessary, in accordance with 40 CFR 270.41.

I.H. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the Conditions of this Permit.

I.I. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

I.J. Proper Operation and Maintenance

The Permittee shall at all times operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee so as to achieve compliance with the Conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This Condition requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the Conditions of this Permit.

I.K. Duty to Provide Information

The Permittee shall furnish to the Manager or his designee, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Manager and Inspector, upon request, copies of records required to be kept by this Permit.

I.L. Inspection and Entry

The Permittee shall allow the Department, or its authorized representatives, upon the presentation of credentials and other documents as may be required by law, to:

I.L.1.

Enter at reasonable times upon the Permittee's premises where regulated hazardous or solid waste management units or activities are located or conducted, or where records must be kept under the Conditions of this Permit;

I.L.2.

Have access to and copy, at reasonable times, any records that must be kept under the Conditions of this Permit;

I.L.3.

Inspect at reasonable times any portion of the Facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

I.L.4.

Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by RCRA or Oregon Law, any substances or parameters at any location.

I.M. Monitoring and Records

I.M.1.

Samples and measurements taken by the Permittee for the purpose of monitoring shall be representative of the monitored activity. The Permittee may request to substitute analytical methods which are equivalent to those specifically approved for use in this Permit by meeting the following:

I.M.1.a.

The Permittee may submit to the Manager a request for a substitution of an analytical method(s) that is equivalent to the method(s) specifically approved for use in this Permit. The request shall provide information demonstrating that the proposed method(s) is equal or superior to the approved analytical method(s) in terms of sensitivity, accuracy, and precision (i.e., reproducibility); and

I.M.1.b.

The Manager notifies the Permittee in writing that the substitution of the analytical method(s) is approved. Such approved substitution of an analytical method(s) shall not require a permit modification.

I.M.2.

The Permittee shall retain records of all monitoring information, (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this Permit, the certification required by 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit, for a period of at least three years from the date of the sample, measurement, report, certification, or recording unless a longer retention period for certain information is required by other Conditions of this Permit. This three year period may be extended by the Manager at any time by notification, in writing, to the Permittee. The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations for the active life of the Facility and, for disposal units, for the post-closure care period as well.

I.M.3.

Records of monitoring information shall include:

I.M.3.a.

The date, exact place, and time of sampling or measurements;

I.M.3.b.

The name, title, and affiliation of the individual(s) who performed the sampling or measurements;

I.M.3.c.

The date(s) analyses were performed;

I.M.3.d.

The name, title, and affiliation of the individual(s) who performed the analyses;

I.M.3.e.

The analytical techniques or methods used; and

I.M.3.f.

The results of such analyses.

I.N. Reporting Planned Changes

The Permittee shall give notice to the Manager, as soon as possible of any planned physical alterations or additions to the permitted Facility.

I.O. Certification of Construction or Modification

The Permittee may not commence storage, treatment, or disposal in a new hazardous waste management unit or in a modified portion of an existing unit until:

I.O.1.

The Permittee has submitted to the Manager by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the hazardous waste management unit has been constructed or modified in compliance with this Permit; and

I.O.2.a.

The Inspector has inspected the modified or newly constructed hazardous waste management unit and has notified the Permittee in writing that he finds it is in compliance with the Conditions of this Permit; or

I.O.2.b.

Within 15 days of the date of submission of the letter in Permit Condition I.O.1., the Permittee has not received notice from the Manager by letter, by certified mail or hand delivery, of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste.

I.P. Anticipated Noncompliance

The Permittee shall give advance notice to the Manager of any planned changes in the Permitted Facility or activity that might result in noncompliance with Permit requirements.

I.Q. Transfer of Permit

This Permit is issued and is personal to the Permittee and is transferable only in accordance with 40 CFR 270.40 and OAR 340-105-0040(2).

I.R. Monitoring Reports

The Permittee shall report monitoring results to the Manager at the intervals required in specific Conditions of this Permit.

I.S. Compliance Schedules

The Permittee shall submit reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule required by specific Conditions of this Permit to the Manager no later than 14 calendar days following each schedule date.

I.T. Twenty-Four Hour Reporting

I.T.1.

The Permittee shall verbally report to the Manager or Inspector, any noncompliance with this Permit which may endanger health or the environment, within 24 hours from the time the Permittee becomes aware of the noncompliance. ‡ **Rev. 3** The report shall include:

[OAR 340-105-0030(2)(b)]

I.T.1.a.

Information concerning release of any hazardous waste that might cause an endangerment to public drinking water supplies; and,

I.T.1.b.

Any information of a release or discharge of hazardous waste or of a fire or explosion from the hazardous waste management facility that might threaten human health or the environment.

I.T.2.

The description of the occurrence and its cause shall include:

I.T.2.a.

Name, address, and telephone number of the owner or operator;

I.T.2.b.

Name, address, and telephone number of the Facility;

I.T.2.c.

Date, time, and type of incident;

I.T.2.d.

Name and quantity of material (s) involved;

I.T.2.e.

The extent of injuries, if any;

I.T.2.f.

An assessment of actual or potential hazards to the environment and human health outside the Facility, where this is applicable; and,

I.T.2.g.

Estimated quantity and disposition of recovered material that resulted from the incident.

I.T.3.

Within 5 calendar days of the time the Permittee becomes aware of noncompliance that may endanger human health or the environment, the Permittee shall provide to the Manager a written submission. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times; the anticipated time noncompliance is expected to continue if the noncompliance has not been corrected; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The

Manager may waive the five-day written notice requirement in favor of a written report within fifteen days.

I.U. Other Noncompliance

The Permittee shall report to the Manager all other instances of noncompliance not reported under Conditions I.R., I.S., and I.T. of this Permit, by March 1 of the following year. This report shall contain the applicable information listed in Condition I.T. of this Permit.

I.V. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit application, or submitted incorrect information in the Permit application or in any report to the Manager or Inspector, the Permittee shall promptly submit such facts or corrected information to the appropriate persons.

I.W. Signature and Certification

All applications, reports required by the Permit and other information requested by the Manager, when submitted to the Manager, or Inspector, by the Permittee shall be signed and certified in accordance with 40 CFR 270.11.

I.X. Confidential Information

Information submitted by the Permittee to the Manager or Inspector that is claimed as trade secret, confidential, or confidential business information by the Permittee will be handled in accordance with the applicable provisions of OAR 340-100-0003.

I.Y. Fees

The Permittee shall pay fees as required under ORS 466.160, 466.165, and promulgated at OAR 340-105, and other state statutes and related rules. This Condition does not preclude the Permittee from challenging any future promulgation or adoption of a statute, rule, or administrative action imposing any fee on the Permittee.

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II. GENERAL FACILITY CONDITIONS

II.A. Design and Operations of Facility

II.A.1.

The Permittee shall design, construct, maintain, and operate the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, groundwater, or surface water which could threaten human health or the environment.

II.A.2.

The Permittee shall construct all future hazardous waste management units in accordance with the approved designs and specifications that are included in the standalone documents of this Permit, except for minor changes deemed necessary by the Permittee to facilitate proper construction of the units. Minor deviations from the approved designs or specifications necessary to accommodate proper construction shall be noted on the as-built drawings, and the rationale for those deviations shall be provided in narrative form. After completion of construction of each future waste management unit, the Permittee shall submit final as-built drawings and the narrative report to the Manager as part of the construction certification document specified in Permit Condition I.O.1.

II.B. Required Notices

II.B.1.

The Permittee shall notify the Inspector in writing at least four weeks in advance of the date hazardous waste from a foreign source is expected to arrive at the Facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.

II.B.2.

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), the Permittee shall inform the generator in writing that it has the appropriate permit(s) for, and will accept, the waste the generator is shipping. The Permittee shall keep a copy of this written notice as part of the operating record in accordance with 40 CFR 264.73(b)(7).

II.C. General Waste Analysis

II.C.1.

The Permittee shall follow the procedures as stated in Standalone Document No. 1, Waste Analysis Plan. [40 CFR 264.13]

II.C.2.

The Permittee shall follow the requirements of 40 CFR 268.7(b), (c), (d) and (e).

II.C.3.

In storing hazardous waste in a storage unit, treating hazardous waste in a treatment unit, or placing hazardous waste in a land disposal unit, the Permittee is responsible for meeting the requirements of 40 CFR 268.

II.C.4.

In addition to the appropriate reporting of noncompliance under Permit Condition I.T. or I.U, upon discovery by the Permittee, or Department notification to the Permittee, that the procedures and tasks in the Waste Analysis Plan (Standalone Document No. 1) failed to characterize adequately a hazardous waste and, as a result, did not designate the proper storage, treatment, or disposal of the hazardous waste, the Permittee shall submit a report to the Department within 45 days of the discovery or notification evaluating the Waste Analysis Plan and explaining why the failure occurred.

II.C.5.

The Permittee may accept hazardous and non-hazardous wastes that are (1) containerized liquid corrosive wastes, (2) bulk liquid corrosive wastes, (3) containerized liquid ignitable and organic wastes, (4) bulk liquid ignitable and organic wastes, (5) containerized and bulk liquid reactive wastes, (6) all containerized liquid wastes not included in (1) through (5), including pesticide wastes plus every combination, (7) all bulk liquid wastes not included in (1) through (6) including pesticide wastes plus every combination, (8) bulk or containerized solid wastes including lab packs such as filter cakes and spill and site cleanup residue, (9) semi-solid or sludge wastes, (10) PCB contaminated wastes greater than or equal to 50 ppm, and (11) compressed gases.

II.C.5.a.i.

The Permittee may accept: Recoverable Organic Wastes limited to: Petroleum hydrocarbon wastes, spent non-halogenated solvents, spent halogenated solvents, commercial chemical products, off-specification species, process residues, and spill residues.

II.C.5.a.ii.

The Permittee may accept: Inorganic wastes limited to: Corrosive wastes, toxicity characteristic wastes, primary and secondary metals wastes (non-reactive), electroplating wastes (non-reactive) soils, sludge, debris, inorganic pigments, aqueous wastes (non-reactive) asbestos and asbestos containing material (RCRA regulated wastes), commercial chemical products, off-specification species, process residues, and spill residues.

II.C.5.a.iii.

The Permittee may accept: Reactive Wastes limited to: Water reactive solid wastes, commercial chemical products, off-specification species, process residues, and spill residues.

II.C.5.a.iv.

The Permittee may accept: Non-recoverable Organic Hazardous Wastes limited to: soils, sludges, debris, toxicity characteristics wastes, organic acids and bases, wood products wastes, pesticide wastes, petroleum/refining wastes, aqueous wastes (non-reactive), commercial chemical products, off-specification species, process residues and spill residues.

II.C.5.a.v.

The Permittee may accept: State-only hazardous waste containing a three percent or greater concentration of any substance or mixture of substances listed in 40 CFR 261.33(e); State-only hazardous waste containing a ten percent or greater concentration of any substance or mixture of substances listed in 40 CFR 261.33(f); spill cleanup residue, soil, water or other debris containing any amount of state-only hazardous wastes; blister agent and nerve agents materials approved for disposal from the Umatilla Army Depot; designated state-only hazardous waste

numbers P998 and P999, respectively; residues from the demilitarization, treatment, and testing of blister and nerve agents designated state-only hazardous waste numbers F998 and F999, respectively; PCB containing materials regulated under OAR 340-110; solid wastes defined by ORS 459.005 and/or OAR 340-93-0030 including cleanup materials contaminated by hazardous substances, commercial solid waste, construction and demolition waste, industrial solid waste, leachate, sludge, wood waste, and asbestos and asbestos-containing material; and pesticide wastes managed under OAR 340-109-0010.

II.C.5.b.i.

The Permittee may not accept at the Facility for treatment or disposal the following hazardous wastes: K013, K027, K044, K045, K047, P006, P009, P031, P033, P056, P063, P065, P076, P078, P081, P095, P096, P111, P112, P122, U020, U023, U033, U096, U115, U117, U124, U125, U133, U135, U160, U162, U169, U171, U189, U205, U213, U223, and U234. However, the Permittee may accept the above-listed hazardous wastes for treatment or disposal if they are residues from the treatment of these wastes and handled in accordance with the Conditions of this Permit. Also, the Permittee may accept the above-listed hazardous wastes for treatment or disposal if they meet the definition of hazardous debris at 40 CFR 268.2. The Permittee may accept for storage, treatment and disposal all soils that are or were hazardous wastes and are subject to the alternative land disposal restrictions treatment standards in 40 CFR 268.49.

II.C.5.b.ii.

The Permittee may not store the following hazardous waste compressed gasses: P009, P031, P033, P056, P063, P076, P078, P095, P096, and U135.

II.C.6.a.

For new hazardous waste codes the Permittee wants to manage at the Facility, which are promulgated after the effective date of this Permit but have been previously been managed at the facility, the Permittee shall submit a permit modification in accordance with 40 CFR 270.42(g).

II.C.6.b.

For new hazardous waste codes that have been promulgated after this Permit is issued and have not been previously managed at the Facility, the Permittee shall submit a permit modification in accordance with that table found in Appendix I of 40 CFR 270.42.

II.C.7. ‡ **Rev. 7**

II.D. Security Procedures

The Permittee shall comply with the security procedures in Standalone Document No. 2, Security Procedures, Hazard Prevention, Training Plan [A.R. 06075].

II.E. Inspection Plan

II.E.1.

The Permittee shall follow the procedures in Standalone Document No. 3, Inspection Plan [A.R. 06076].

II.E.2.

The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Inspection reports shall be recorded and maintained as required by 40 CFR 264.15(d).

II.E.3.

The Permittee shall maintain a copy of the latest approved Inspection Plan [A.R. 06076] at the Facility until the Facility is fully closed and certified.

II.F. Training Plan

II.F.1.

The Permittee shall train all personnel who handle hazardous waste in hazardous waste management, safety and emergency procedures, as applicable to their job description, in accordance with Standalone Document No. 2, Security Procedures, Hazard Prevention, Training Plan [A.R. 06075]. These personnel shall be trained in accordance with the Training Plan and documentation of training shall be maintained as specified in the Training Plan.

II.F.2.

The Permittee shall maintain a copy of the latest approved Security Procedures, Hazard Prevention, Training Plan [A.R. 06075] at the Facility until the Facility is fully closed and certified closed.

II.G. Hazards Prevention

The Permittee shall follow the hazards prevention procedures in Standalone Document No. 2, Security Procedures, Hazards Prevention, Training Plan [A.R. 06075].

II.H. Contingency Plan

The Permittee shall follow the contingency procedures in Standalone Document No. 4, Contingency Plan [A.R. 06077].

II.I. Manifest System, Recordkeeping, and Reporting

II.I.1.a.

The Permittee shall follow the procedures for using the manifest system and identifying and resolving significant manifest discrepancies in accordance with 40 CFR 264.71, 264.72, and 270.30(1)(7) and Standalone Document No. 1, Waste Analysis Plan [A.R. 06074].

II.I.1.b.

The Permittee shall submit an un-manifested waste report to the Manager, in accordance with 40 CFR 264.76 and 270.30(1)(8), within fifteen calendar days of receipt of un-manifested waste.

II.I.2.

The Permittee shall maintain a written operating record at the Facility in accordance with 40 CFR 264.73(a) for all records identified in 40 CFR 264.73(b)(1) through (b)(17).

II.I.3.

The Permittee shall retain all hazardous waste management records, including data collected in accordance with procedures of the Response Action Plans, and make such records available, at reasonable times, for inspection to the Inspector, in accordance with 40 CFR 264.74(a).

II.I.4.

The retention period for all records required by this Permit is extended automatically during the course of any unresolved enforcement action regarding the Facility or as directed by the Manager, in accordance with 40 CFR 264.74(b).

II.I.5.a.

The Permittee shall submit a survey plat indicating the location and dimensions of landfill units or other hazardous waste disposal units in accordance with 40 CFR 264.116 to the local land use authority and to the Department by the date of submission of certification of closure of each landfill unit at the Facility.

II.I.5.b.

The Permittee shall submit post-closure notices to the local land use authority and to the Department in accordance with 40 CFR 264.119(a).

II.I.6.

The Permittee shall submit a monthly hazardous waste management record to the Manager in accordance with OAR 340-105-0120(7). The Permittee shall submit an annual report covering Facility activities to the Manager in accordance with OAR 340-104-0075(3).

II.I.7.

The Permittee shall submit additional reports to the Manager, in accordance with 40 CFR 264.77 as required by 40 CFR Part 264 Subparts F, K through N, AA, BB, and CC.

II.I.8.

All reports, notifications, applications, or other materials required to be submitted to the USEPA shall be submitted to the Director, Office of Air, Waste and Toxics at EPA Region 10 in Seattle, WA.

II.J. Closure

II.J.1.

The Permittee shall meet the general closure performance standard in 40 CFR 264.111 during closure of all hazardous waste management units and the Facility. Compliance with 40 CFR 264.111 shall require closure of each hazardous waste management unit in accordance with the Standalone Document No. 5, Closure/Post-Closure Plan Cost Estimates, Financial Assurance, Insurance [A.R. 06078].

II.J.2.

Final cover design for landfill units L-12, L-13, and L-14 shall be as specified in Closure Cover Design Details in Standalone Document No. 17, Landfill Final Cover Design Plan [A.R. 06090], and landfill units L-12, L-13, and L-14 shall be capped in accordance with Standalone Document No. 17, Landfill Final Cover Design Plan [A.R. 06090].

II.J.3.

For all landfill units and other hazardous waste management units to be closed as landfills, minor deviations from the Permitted closure designs, specifications, or procedures necessary to accommodate proper closure shall be noted on the as-built drawings and the rationale for those deviations in designs, specifications, or procedures shall be provided in narrative form with the closure certification statements. Such minor deviations shall not be considered modifications of the Permit. ‡ **Rev. 3** Within 60 calendar days after completion of the closure of each landfill unit and other hazardous waste management units closed as landfills, the Permittee shall submit the final as-built drawings of the closed unit, the narrative report and the certification statements to the Manager.

II.J.4.

For all hazardous waste management units other than units closed as landfills, minor deviations from the Permitted closure procedures necessary to accommodate proper closure shall be described in a narrative form with the closure certification statements. Such minor deviations shall not be considered modifications of the Permit. The Permittee shall describe the rationale for implementing minor deviations as part of this narrative report. Within 60 calendar days after completion of closure of each hazardous waste management unit, other than landfill units and units closed as landfills, the Permittee shall submit the certification statements and narrative report to the Manager.

II.J.5.

The Permittee shall amend the Closure Plan when required in accordance with 40 CFR 264.112(c).

II.J.6.

The Permittee shall notify the Manager at least 60 calendar days prior to the date it expects to begin closure of any surface impoundment or landfill unit and at least 45 calendar days prior to the date it expects to begin closure of any tanks, container storage unit, or containment building.

II.J.7.

For closure at all hazardous waste units, the Permittee shall submit a task-specific/unit-specific closure work plan to the Department no less than 30 days before the Permittee begins closure activities at the specific unit. The Department shall review the work plan for conformity with this Permit and issue an approval to proceed. ‡ **Rev. 1**

II.J.8.

The Permittee shall decontaminate or dispose of all Facility equipment as specified in the Closure Plan.

II.J.9.

The Permittee shall provide certification statements that each unit at the Facility has been closed in accordance with the applicable specifications in the Closure Plan, in accordance with 40 CFR 264.115.

II.J.10 [Reserved]

II.J.11.

The Permittee shall follow the soil sampling procedures and analysis outlined in Appendix A of Standalone Document No. 5, Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance [A.R. 06078]. The Permittee shall modify the sampling grid procedure, as appropriate and necessary, when sampling soils at or near the perimeter of buildings and concrete structures, or in similar situations. Such change shall not require a permit modification. The Permittee shall document the change in the closure report submitted to the Manager in accordance with Permit Condition II.J.3.

II.J.12.

In the event that any hazardous waste management unit, other than a landfill unit, cannot be "clean closed" by removing hazardous waste, hazardous constituents and contaminated subsoil as specified in section II.J. of this Permit, the Permittee shall revise the Facility post-closure plan to include a post-closure plan for that unit. The Permittee shall submit the post-closure plan for that unit to the Manager, as a Permit modification request, within 90 calendar days of the date that the Manager notifies the Permittee, in writing, that the unit shall be closed as a landfill, in accordance with 40 CFR 264.118(a).

Other Closure Conditions

II.J.13.a. [Reserved]

II.J.13.b.

Regardless of any Permit Condition found in a standalone document or this Permit, at closure for surface impoundments P-A and P-B, the Permittee shall either: (1) Remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated subsoils, and structures and equipment contaminated with waste and leachate, and manage them as hazardous waste unless 40 CFR 261.3(d) applies, or (2) appropriately modify this Permit and allow P-A and P-B to operate and eventually close as a landfill. [OAR 340-104-0228]

II.J.13.c.

Regardless of any Permit Condition found in a standalone document or this Permit, requests for variance and stated timelines in Standalone Document No. 5, Closure/Post-Closure Plans, Costs Estimates, Financial Assurance, Insurance [A.R. 06078] allowed for closure for all units are hereby not approved. The Permittee shall follow the closure time frames set forth in 40 CFR 264.113 unless another time frame is approved by permit modification.

II.J.13.d.

The Permittee shall upon final closure of the Facility remove all Facility hazardous waste structures (e.g., tanks, storage units, etc.), and all Facility unused buildings, non-hazardous structures, and equipment and restore, to the extent reasonably practicable, the site to its original condition. However, the Permittee may at any time submit in writing a request for a modification to Standalone Document No. 5, Closure/Post-Closure Plans [A.R. 06078] for any structure, building or equipment the Permittee determines it desires to leave standing after the final Facility closure. In the request for a modification, the Permittee shall identify a use for any structure, building or equipment to remain standing upon final closure of the Facility. Upon Department written approval of the modification, Permittee may leave the structure, building or equipment standing upon final closure of the Facility. The closure/post-closure costs for all Facility hazardous waste structures (e.g., tanks, storage units, etc.) and all Facility unused

buildings, non-hazardous structures, and equipment shall use the estimated costs to sample and, if needed, decontaminate the structure, building or equipment. [ORS 466.150(5)]‡ **Rev. 10**

II.J.13.e.

(removed ‡ **Rev. 21**)

II.J.13.e.i.

(removed ‡ **Rev. 21**)

II.J.13.g.

Upon commencement of the end of the post -closure period, the Permittee shall negotiate in good faith and enter with the Department an Access Agreement under reasonable terms that will allow the Department to enter the Facility when necessary to carry out actions authorized by ORS 466.095 through 466.225.

II.K. Cost Estimate for Facility Closure

II.K.1.

The Permittee shall comply with the requirements of 40 CFR 264.142(a). The Permittee shall maintain a current closure cost estimate for each individual waste management unit. These costs shall be summarized, by the Permittee, for final closure of the entire Facility.

II.K.2.

The Permittee shall adjust the closure cost estimate for inflation on an annual basis, in accordance with 40 CFR 264.142(b).

II.K.3.

During the active life of the Facility, the Permittee shall revise the closure cost estimate within 30 calendar days of an approved modification to the closure plan, if such modification results in an increase in the closure cost estimate, in accordance with 40 CFR 264.142(c).

II.K.4.

During the operating life of the Facility, the Permittee shall keep at the Facility a copy of the latest closure cost estimate and, when this estimate has been adjusted in accordance with 40 CFR 264.142(b), the latest adjusted closure cost estimate in accordance with 40 CFR 264.142(d).

II.K.5.

The Permittee shall maintain an updated summary of current closure costs for the entire Facility closure based on the waste management units that have received RCRA waste, but have not yet been certified as closed and have not been released from the financial assurance requirements as specified in Permit Condition II.N., (i.e., active units).

II.K.6.

Prior to placement of hazardous waste in any new hazardous waste management unit, the Permittee shall amend, as necessary, the summary of current closure costs to reflect the estimated closure cost of that new unit. Such amended closure costs shall be annually adjusted for inflation, as required by 40 CFR 264.142(b). [See Permit Condition II.N.2.].

II.K.7.

Upon closure certification of any hazardous waste management unit, in accordance with 40 CFR 264.115, and after the Manager has released the Permittee from the financial assurance requirements for that unit as specified in Permit Condition II.N., the Permittee may adjust the summary of current closure costs to reflect the closure cost of that unit. Along with the closure certification statement for a closed unit, the Permittee shall submit the current version of the closure cost estimate for the Facility, indicating cost estimates for each remaining unit to be closed, to the Manager.

II.L. Post-Closure Care

II.L.1.

The Permittee shall comply with Standalone Document No. 5, Closure/Post-Closure Plan, Cost Estimate, Financial Assurance, Insurance [A.R. 06078]. In addition, the Permittee shall comply with 40 CFR 264.117, 264.118, 264.119, and 264.120.

II.L.2.

The period of post-closure care for each closed landfill unit shall end after 30 years from the effective date of this permit renewal. Units that have not closed by the date of this permit renewal shall have a 30 year post-closure period commencing upon the certified closure date of the unit.

II.L.3.

As part of the post closure certification sent in accordance with 40 CFR 264.120, the Permittee shall submit to the Department a report which includes a determination of future use, or abandonment of, groundwater monitoring wells at the Facility in accordance with OAR 690-240.

II.M. Cost Estimate for Post-Closure Care

II.M.1.

The Permittee shall comply with 40 CFR 264.144(a). The Permittee shall maintain a current post-closure cost estimate for each post-closure activity.

II.M.2.

The Permittee shall adjust the post-closure cost estimate for inflation on an annual basis, in accordance with 40 CFR 264.144(b).

II.M.3.

During the active life of the Facility, the Permittee shall revise the post-closure cost estimate within 30 calendar days of an approved modification to the post-closure plan, if such modification results in an increase in the post-closure cost estimate, in accordance with 40 CFR 264.144(c).

II.M.4.

During the operating life of the Facility, the Permittee shall keep at the Facility a copy of the latest post-closure cost estimate and, when this estimate has been adjusted in accordance with 40 CFR 264.144(b), the latest adjusted post-closure cost estimate in accordance with 40 CFR 264.144(d).

II.M.5.

[Reserved]

II.M.6. [Removed]

‡ Rev. 1, 5

II.N. Financial Assurance for Facility Closure

II.N.1.

The Permittee shall comply with 40 CFR 264.143, as amended by OAR 340-104-0143 or 40 CFR 264.146, by providing documentation of financial assurance, as required by 40 CFR 264.151, as amended by OAR 340-104-0151, in the amount of the cost estimates required by Permit Condition II.K.1.

II.N.2.

Prior to placement of hazardous waste in any new hazardous waste management unit, the Permittee shall update the closure financial assurance mechanism, as necessary, so that an adequately funded financial assurance mechanism for closure of the Facility, including the new unit, is in effect. A copy of the updated financial assurance mechanism shall be submitted to the Manager before waste is placed in the new unit. [See Permit Condition II.K.6.].

II.N.3.

Changes in financial assurance mechanisms shall be approved by the Manager pursuant to 40 CFR 264.143.

II.O. Financial Assurance for Facility Post-Closure

II.O.1.

The Permittee shall comply with 40 CFR 264.145, as amended by OAR 340-104-0145, or 40 CFR 264.146 by providing documentation of financial assurance, as required by 40 CFR 264.151, as amended by OAR 340-104-0151, in the amount of the cost estimates required by Permit Condition II.M.1.

II.O.2.

Changes in financial assurance mechanisms shall be approved by the Manager pursuant to 40 CFR 264.145.

II.P. Liability Requirements

II.P.1.

The Permittee shall comply with the requirements of 40 CFR 264.147(a), as amended by OAR 340-104-0147, and the documentation requirements of 40 CFR 264.151, as amended by OAR 340-104-0151, including the requirements to have and maintain liability coverage for sudden

accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

II.P.2.

The Permittee shall comply with the requirements of 40 CFR 264.147(b), as amended by OAR 340-104-0147, and the documentation requirements of 40 CFR 264.151, as amended by OAR 340-104-0151, including the requirements to have and maintain liability coverage for non-sudden accidental occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs.

II.Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions

The Permittee shall comply with 40 CFR 264.148.

II.R. Equivalent Materials/Information

If certain equipment, materials, procedures, and administrative information (such as names, phone numbers, addresses, obsolete forms, addition of new forms and to forms, format of tables or forms, deletion from forms of units certified as closed, etc.) are specified in this Permit, the Permittee is allowed to use an equivalent or superior substitute or deletion. Use of such equivalent or superior substitute or deletion shall not be considered a modification of the Permit, but the Permittee shall present the proposed change to the Department, and then with Department approval (such approval may be verbal or written) submit to the Department by written letter the revision, accompanied by a narrative explanation, and the date the revision becomes effective. If the Department determines that the change is not in accordance with the approval, the Department will by letter direct the Permittee to submit the change again.

II.S. RCRA Subparts AA and BB and Other Air Emissions

The Permittee shall comply with the all applicable requirements found in 40 CFR 264 Subparts AA and BB, and other air emission physical and operational limitations and requirements in this Permit and the standalone documents.

II.T. ORS 466.065 Requirements

II.T.1.

The Permittee shall not land dispose greater than 5,900,000 tons of hazardous waste during the ten-year term of this Permit without approval from the Department in accordance with ORS 466.065(1).

II.T.2.

The Permittee shall not treat greater than 37,275,980 tons of hazardous waste during the ten-year term of this Permit without approval of the Department in accordance with ORS 466.065(1).

II.T.3.

The Permittee shall comply with all applicable Federal and Oregon technological requirements for treating and disposing of hazardous waste.

II.T.4.

The Permittee shall maintain the property line setback as specified at OAR 340-120-0010(e)(B) by having at least a 1,000 foot separation between active waste management areas and facilities, and property boundaries.

II.T.5.

The Permittee, and its parent company, shall comply with all applicable Oregon and Federal requirements for financial and technical capability to properly construct and operate the Facility.

II.T.6.

The Permittee shall own, or contract with, an emergency response provider or coordinator that can provide for timely response to a spill or release in Oregon of hazardous waste being transported to the Facility by a motor vehicle owned by the Permittee.

II.T.7.

The Permittee shall determine if any transporter of hazardous waste hired by the Permittee, owns or has a contract with an emergency response provider or coordinator that can provide for timely response to a spill or release in Oregon of hazardous waste being transported by a motor vehicle to the Facility.

II.T.8.

The Permittee shall, upon arrival at the Permittee's Facility of any motor vehicle transporting hazardous waste in a motor vehicle not owned or hired by the Permittee, request to review the transporter's authorization to transport hazardous waste in Oregon and the driver's authorization to drive a motor vehicle transporting hazardous waste in Oregon. The Permittee shall provide to the Department in writing the name of any transporter or driver that fails to demonstrate the requested authorization.

II.U. Management of Subpart CC Wastes

II.U.1.

The Permittee shall not manage hazardous wastes containing an average volatile organic concentration of 500 parts per million by weight (ppmw), or more as determined by 40 CFR 264.1083, at any permitted tank or surface impoundment, until this Permit is modified to incorporate the requirements of 40 CFR 264.1082(b), except as 40 CFR 264.1080 and 40 CFR 264.1082(b) provide otherwise.

II.U.2.a.

The Permittee is authorized to manage volatile organic hazardous wastes with an average concentration of 500 parts per million by weight, or more, as determined using 40 CFR 264.1083, at all permitted storage units in accordance with the Container Level 1 or Level 2 standards, as applicable, meeting the requirements of 40 CFR 264.1086(c) and (d), respectively. Except as provided by Permit Condition II.U.3., management of Container Level 3 standards is prohibited unless this permit is modified.

II.U.2.b.

If the Permittee manages volatile organic hazardous wastes with an average concentration of 500 parts per million by weight or more, as determined by 40 CFR 264.1083, in containers at a

permitted storage unit that require Container Level 1 or 2 standards, the Permittee shall comply with 40 CFR 264.1086(c) and (d), respectively.

II.U.3.

The Permittee may manage volatile organic hazardous wastes with an average concentration of 500 parts per million by weight, or more, as determined by 40 CFR 264.1083, that are undergoing biotreatment in accordance with Bioremediation Facility and Organic Recovery Unit Design and Operations Plan [A.R. 06092], Standalone Document No. 19.

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III. CONTAINER STORAGE

III.A. Design and Operation

III.A.1.a.

The Permittee may store those containerized wastes listed under Permit Condition II.C.5. and II.C.5.a.i.v., and the second, third and fourth sentences in Permit Condition II.C.5.b.i. only in storage units S-1, S-2, S-3, S-4, S-5, S-6, S-10, and S-11A. The Permittee shall not store containerized water reactive hazardous wastes in these units except as allowed in Standalone Document No. 9, Container Storage Design and Operation Plan [A.R. 06082]. ‡ **Rev. 3**

III.A.1.b.

The Permittee shall not store hazardous wastes listed under Permit Condition II.C.5.b.ii in all container storage units.

III.A.1.c.

The Permittee may store containerized hazardous wastes in containment buildings B-2 and B-5 in compliance with Permit Conditions under III.A. through III. I and Standalone Document No. 9, Container Storage Design and Operation Plan. The Permittee may not have more than 50 hazardous waste containers in each of these containment buildings. ‡ **Rev. 3**

III.A.2.

The quantity of containerized hazardous waste stored in each designated container storage unit shall be limited by the design capacity of that unit, as specified in Standalone Document No. 9, Container Storage Design and Operations Plan [A.R. 06082].

III.A.3.

The Permittee shall store containerized hazardous waste in the manner described in Standalone Document No. 9, Container Storage Design and Operations Plan [A.R. 06082], except as otherwise specified in this section of the Permit. Compliance with the storage operation procedures outlined in Container Storage Design and Operations Plan [A.R. 06082] and Permit Condition II.A.1, shall constitute compliance with the following requirements of 40 CFR Part 264:

- 264.171 Condition of containers;
- 264.172 Compatibility with waste containers;
- 264.173 Management of containers;
- 264.174 Inspections;
- 264.176 Special requirements for ignitable or reactive wastes; and
- 264.177 Special requirements for incompatible wastes.

III.A.4.

The Permittee is authorized by law to store or treat hazardous waste in containers in accordance with 40 CFR 262.34.

III.A.4.a.

Except as provided in Section VII of this Permit, bioremediation of containerized solid wastes containing free liquids shall be conducted in storage units authorized to store liquid wastes in accordance with the operation procedures and monitoring in Standalone Document No. 19, Bioremediation Facility and Organic Recovery Unit Design and Operations Plan [A.R. 06092].

III.A.5.

All container storage units shall be designed in accordance with all design requirements, engineered drawings, and applicable recommendations in Standalone Document No. 9, Container Storage Design and Operations Plan [A.R. 06082].

III.A.5.a.

Container storage units S-3 and S-5, are not authorized to store containerized liquid hazardous wastes unless this Permit is modified. ‡ **Rev. 3**

III.B. Inspections

The Permittee shall store all containers of hazardous waste on a single tier, (i.e., no stacking) at all container storage units, except as allowed by Permit Condition III.C.1. and Stand Alone Document No. 9 and except that small containers that are suitable for stacking (e.g., boxes or crates) may be stacked to a reasonable level, (not to exceed 5 feet in height) and intermodal type containers specifically designed for stacking may be stacked, provided the stack is stable and there is no apparent hazard of such containers tipping or falling and provided that inspection of such containers is not inhibited. Containers used in bio-treatment may be stacked three high. ‡ **Rev. 3**

The Permittee shall, immediately upon request from the Inspector reposition any container, as necessary, to make the label on that container visible from the aisle for the purpose of inspection.

III.C. Aisle Space

III.C.1.

The Permittee shall maintain a minimum of 2.5 feet of aisle space for hazardous waste containers at all container storage units at the Facility. Maintenance of the specified aisle space shall constitute compliance with 40 CFR 264.35. At container storage unit S-2: The Permittee shall not double stack 55-gallon, or larger, hazardous waste containers unless all permitted floor space in an individual storage area (A, B, C, D or E) within container storage unit S-2 is occupied by a container. The Permittee may double stack 55-gallon, or larger, containers if such permitted floor space is occupied. ‡ **Rev. 3** Containers that have a volume less than 55-gallons may be double-stacked at anytime.

III.C.2.

At container storage unit S-2, the Permittee shall maintain a minimum aisle width of four (4) feet between hazardous waste container rows and between containers and walls for ignitable and reactive hazardous wastes. ‡ **Rev. 3**

III.D. Containment

III.D.1.

The Permittee shall store hazardous waste containers in a manner that minimizes the potential for container deterioration. ‡ **Rev. 3**

III.D.2.

Container storage of liquid and non-liquid hazardous wastes in S-1, S-2, S-3, S-4, S-5, S-6, S-10, and S-11A in the manner specified in Standalone Document No. 9, Container Storage Design and Operation Plan [A.R. 06082], shall constitute compliance with 40 CFR 264.175(b) and (c).

III.E. Requirement for Containerized Wastes

All containers holding hazardous waste shall be covered at all times, except when hazardous wastes are being added, removed, or inspected. ‡ **Rev. 3**

III.F. Special Requirement for Incompatible Wastes

The Permittee shall comply with 40 CFR 264.177.

III.G. Closure

The Permittee shall close all container storage units in accordance with Section 1.0 of the Closure Plan in Standalone Document No. 5 [A.R. 06078] and Section II.J. of this Permit.

III.H. Additional Conditions at Container Storage Unit S-2

III.H.1.

S-2 storage areas A through E, as shown in drawing 10-AS-1 in Standalone Document No. 9, shall be constructed such that 10% of the maximum volume stored in the specific storage area is contained within that specific storage area. At a minimum, all surrounding berms around each specific storage area shall be no less than 3 inches in height.

III.H.2.

The Permittee shall follow the operational conditions found in Standalone Document No. 9, Container Storage Design and Operations Plan [A.R. 06082] as amended by Permit Conditions III.H.3. through III.H.7.

III.H.3.

Within container storage unit S-2, the Permittee may only store hazardous wastes at storage areas A, B, C, D and E, as designated in drawing 10-AS-1 in Standalone Document No. 9. ‡ **Rev. 3** Hazardous wastes found in the designated area "Receiving Area" shall be hazardous wastes undergoing analysis in accordance with Standalone Document No. 1, Waste Analysis Plan A.R. 06074].

III.H.4.

Unless otherwise approved by the Department, the maximum allowable storage for hazardous waste containers for each storage location is: ‡ **Rev. 3**

Storage Areas				
A (# 55-gal. drums) (gallons)	B (# 55-gal. drums) (gallons)	C (# 55-gal. drums) (gallons)	D (# 55-gal. drums) (gallons)	E (# 55-gal. drums) (gallons)
164	142	142	142	188
9,020	7,810	7,810	7,810	10,340

III.H.5.

The Permittee shall maintain rows of hazardous waste containers to be no more than two 55-gallon drums wide. For hazardous waste containers larger than 55-gallon drums, a container row shall be no wider than the single largest container in that row. ‡ **Rev. 3**

III.H.6.

The Permittee may not store incompatible wastes within the same storage area which is serviced by a single sump.

III.H.7.

The Permittee shall have signage to indicate what class of hazardous waste (e.g., acid, oxidizer, toxic, etc.) is being stored within a container storage unit which is serviced by a single sump.

III.I. Subpart CC Air Emission Requirements

The Permittee shall comply with Permit Conditions II.U.2.a. and II.U.2.b.

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IV. TANK STORAGE AND TREATMENT

IV.A. Applicability of Rules

IV.A.1.

The Permittee shall comply with the regulations pertaining to hazardous waste tank systems in 40 CFR 264 Subpart J.

IV.A.2.

The Permittee is authorized by law to store or treat hazardous waste generated on-site in tanks in accordance with 40 CFR 262.34.

IV.A.3

The Permittee shall not store hazardous wastes prohibited from storage under Permit Condition II.C.5.b.ii. in all tanks, and shall not treat hazardous wastes prohibited from treatment the first sentence of Permit Condition II.C.5.b.i. in all tanks.

IV.B. Bulk Liquid Storage and Treatment Facility/Wastewater Treatment Unit ‡ Rev. 14

IV.B.1.

The bulk liquid storage and treatment facility/wastewater treatment unit shall consist of all associated ancillary equipment, containment system, and tanks which includes: Six 10,500 gallon tanks, two 5,200 gallon mix tanks, one 1,500 gallon clarifier, one 2,600 gallon thickener tank, one 1,440 gallon surge tank, two 400 gallon sand filters, two eleven gallon bag filters, and two 1,700 gallon carbon vessels ‡ **Rev. 14**, as described in Standalone Document No. 8, Bulk Liquid Storage/Treatment Plan [A.R. 06081]. In addition, the tank system capacity includes the tanks described in the Wastewater Treatment Facility Operations Manual, also found in Standalone Document No. 8, Bulk Liquid Storage/Treatment Plan [A.R. 06081].

IV.B.2.

The Permittee may store and treat any wastes, in liquid form, listed under Permit Conditions II.C.5. and II.C.5.a.i-v. and the second, third and fourth sentences in Permit Condition II.C.5.b.i. in the bulk liquid storage and treatment facility. Compliance with 40 CFR 264.198 for ignitable or reactive wastes is required, in order for such wastes to be managed in the Permitted tank systems. Additionally, if the waste is incompatible with any waste already in a tank, or the tank itself, based on compatibility assessment as specified in Standalone Document No. 1, Waste Analysis Plan [A.R. 06074], such waste shall not be stored or treated in that tank.

IV.B.3.

The Permittee shall operate the bulk liquid storage and treatment facility/wastewater treatment unit ‡ **Rev. 14** in accordance with the procedures in Standalone Document No. 8, Bulk Liquid Storage/Treatment Plan [A.R. 06081].

IV.B.4.

The Permittee shall maintain spill controls, and overfill prevention controls as required by 40 CFR 264.194. Overfill prevention controls shall be set such that one foot of freeboard in each tank (headspace) is maintained at all times.

IV.C. Stabilization Unit Tanks

IV.C.1.

The stabilization unit tanks shall consist of 12 in-ground steel tanks, with a capacity of approximately 15,000 gallons each. The design of each tank and the secondary containment structure shall be as described in Standalone Document No. 10, Stabilization/Chemical Treatment Plan [A.R. 06083].

IV.C.2.

The Permittee may store and treat any wastes described in Permit Condition II.C.5. and II.C.5.a.i.-v. and the second, third and fourth sentences in Permit Condition II.C.5.b.i. in the stabilization unit tanks. Additionally, if any hazardous waste is water reactive, has a pH less than or equal to 2, or is incompatible with other wastes already in the tank, based on the compatibility assessment as specified in the Waste Analysis Plan [A.R. 06074], such waste shall be treated in accordance with the applicable sections of Standalone Document No. 10, Stabilization/Chemical Treatment Plan [A.R. 06083]. Water-reactive hazardous waste may only be treated upon Department approval for each waste stream (which approval shall not be considered a modification of this Permit).

IV.C.3.

The Permittee shall operate the stabilization unit tanks in accordance with Standalone Document No. 10, Stabilization/Chemical Treatment Plan [A.R. 06083].

IV.C.4.

The Permittee shall maintain at least two feet of freeboard in the stabilization unit tanks at all times. Hazardous waste in the unit, other than residue or stain on the inside of the tank walls, shall not exceed the two-foot freeboard requirement, except as may be necessary during the actual mixing process. Residue or stain on the inside of the tank walls above the two-foot freeboard limit shall not, in itself, result in a freeboard violation.

IV.D. Closure

The Permittee shall close all tank units in accordance with the applicable sections of Standalone Document No. 5, Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance [A.R. 06078] and Section II.J. of this Permit.

IV.E. Subpart CC Air Emission Requirements

The Permittee shall comply with Permit Condition II.U.1.

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V. SURFACE IMPOUNDMENT STORAGE AND TREATMENT

V.A. Surface Impoundments.

V.A.1.

Surface impoundments shall consist of two existing units P-A and P-B.

V.A.2.a

The Permittee may store and treat any wastes, in liquid or semi-solid form, listed under Permit Condition II.C.5. and II.C.5.a.i.-v. and the second, third and fourth sentences in Permit Condition II.C.5.b.i. in the surface impoundments. The Permittee shall not store or treat any hazardous wastes which are restricted from land disposal under 40 CFR Part 268 unless the applicable treatment standard as specified in 40 CFR Part 268 has been achieved prior to placement in the surface impoundments. In addition, as new hazardous wastes are prohibited from land disposal unless the wastes meet the land disposal restriction treatment standards under 40 CFR Part 268, the Permittee shall immediately cease placement of such wastes in any surface impoundment upon the effective date of the 40 CFR Part 268 regulation.

V.A.2.b.

The Permittee shall not store hazardous wastes listed under Permit Condition II.C.5.b.ii. in the surface impoundments and shall not treat hazardous wastes listed in the first sentence under Permit Condition II.C.5.b.i. in the surface impoundments.

V.A.3.

If any waste, or the product of residue of the treatment of such waste, is incompatible with wastes already in a surface impoundment, based on the compatibility assessment as specified in Standalone Document No. 1, Waste Analysis Plan [A.R. 06074], such waste shall not be placed into the surface impoundment.

V.A.4.

The Permittee shall operate all surface impoundments in the manner specified in Standalone Document No. 13, Surface Impoundments Design and Operations Plan [A.R. 06086]. The Permittee shall operate each surface impoundment in a manner to prevent physical barriers (i.e., solid material or sludge) from restricting the mixing of liquid waste.

V.A.5.a.

The Permittee shall maintain freeboard in each surface impoundment as specified in Standalone Document No. 13, Surface Impoundments Design and Operations Plan [A.R. 06086] and shall follow the procedures specified in Surface Impoundments Design and Operations Plan [A.R. 06086] to prevent overtopping.

V.A.5.b.

The Department reserves the right to increase the amount of freeboard required at any surface impoundment if overtopping has occurred. Such a change could occur at any point during the life of this Permit and would be effective upon written notification from the Manager to the Permittee. Such a change would not require a Permit modification in accordance with 40 CFR 270.42.

V.A.6.

Prior to placement of any sludge from the surface impoundments into a landfill unit, the Permittee shall follow the stabilization (when necessary) and analyses procedures outlined in the Waste Analysis Plan [A.R. 06074], Surface Impoundments Design and Operations Plan [A.R. 06086], and Stabilization/Chemical Treatment Plan [A.R. 06083] to ensure that the sludge has been properly stabilized. The Permittee may stabilize the sludge within the surface impoundments as specified in Standalone Document No. 5, Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance [A.R. 06078], and Standalone Document No. 13, Surface Impoundments Design and Operations Plan, Response Action Plan [A.R. 06086].

V.A.7.

The Permittee shall follow the requirements of Standalone Document No. 13, Surface Impoundments Design and Operations Plan [A.R. 06086] when emergency repairs are undertaken for an surface impoundment. ‡ **Rev. 3**

V.A.8.

The Permittee shall follow the procedures in Standalone Document 13, Surface Impoundments Design and Operations Plan, Response Action Plan [A.R. 06086], for units P-A and P-B, that require a response action plan.

V.B. Subpart CC Air Emission Requirements

The Permittee shall comply with Permit Condition II.U.1.

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VI. LANDFILL DISPOSAL

VI.A. Existing Closed Landfill Units L-5, L-7, and L-9

VI.A.1.

The Permittee shall inspect the leachate collection system in units L-5, L-7 and L-9 for the presence of liquid at the frequency specified in Standalone Document No. 3, Inspection Plan [A.R. 06076]. The results of the inspection, including the amount of any liquid found, shall be entered in the operating record. Prior to final Facility closure, if liquid is found in the leachate collection system, all pumpable quantities of such liquid shall be removed, to the extent practicable, within 24 hours of the time such liquid is found. The time for removal of liquid shall be 72 hours after finding liquid in the leachate collection system after final Facility closure. In all cases, the liquid shall be managed as hazardous waste.

VI.B. Operating Landfill Units L-12, L-13, and L-14

VI.B.1.

The Permittee may dispose of any wastes listed under Permit Condition II.C.5. and II.C.5.a.i.-v. and the second, third and fourth sentences in Permit Condition II.C.5.b.i. in landfill units L-12, L-13, or L-14 except that the following restrictions on waste disposal shall apply:

VI.B.2.a.

The Permittee shall not dispose of hazardous wastes listed in the first sentence under Permit Condition II.C.5.b.i.

VI.B.2.b.

The Permittee shall not dispose of wastes containing free liquids. Free liquids analyses shall be performed in accordance with the applicable procedures in Waste Analysis Plan [A.R. 06074]. Note: Liquid wastes that are contained in lab packs (packaged in accordance with 40 CFR 264.316) or containers, that are very small such as ampoules, or containers that are designed to hold free liquids for use other than storage, such as capacitors or batteries (in accordance with 40 CFR 264.314), may be disposed without stabilization and related testing and verification procedures, provided other restrictions, as specified in this Permit or by other statutes or regulations, do not prohibit the land disposal of such wastes.

VI.B.2.c.i.

The Permittee shall not dispose of any hazardous waste which was generated as a liquid and was then stabilized by the generator (or another off-site treatment facility) unless the Permittee has conducted testing to ensure that the waste has been properly stabilized, (i.e., achieves the appropriate treatment standard required by 40 CFR Part 268 and does not contain free liquids). Such testing shall be done by the Permittee, using sampling and analytical methods outlined in Waste Analysis Plan [A.R. 06074], and Stabilization/Chemical Treatment Plan [A.R. 06083]. Records of such analyses shall be maintained in the operating record for a minimum period of three years. This Permit Condition [VI.B.2.c.i.] shall not apply if the Permittee complies with Permit Condition VI.B.2.c.ii.

VI.B.2.c.ii.

As an alternative to the testing by the Permittee specified in Permit Condition VI.B.2.c.i., the Permittee shall maintain documentation supplied by the generator (or another off-site treatment facility) that proper stabilization has been achieved. Documentation from the generator (or another off-site treatment facility) shall contain a signed certification that the stabilized hazardous waste achieves the appropriate treatment standard required by 40 CFR Part 268 and does not contain free liquids as specified in this Permit. The Permittee shall maintain such documentation in the operating record for a minimum period of three years.

VI.B.2.d.

The Permittee shall not dispose of any wastes which are restricted from land disposal under 40 CFR Part 268 unless the applicable treatment standard in 40 CFR Part 268 has been achieved. In addition, as new hazardous wastes are prohibited from land disposal unless the wastes meet the land disposal restriction treatment standards under 40 CFR Part 268, the Permittee shall immediately cease disposing of such wastes upon the effective date of the 40 CFR Part 268 regulation, unless the treatment standards for the hazardous wastes in 40 CFR Part 268 have been achieved.

VI.B.2.e.

The Permittee shall not dispose ignitable or reactive hazardous wastes (Environmental Protection Agency Waste numbers D001 or D003, respectively) or any EPA-listed hazardous waste for which the basis for listing is ignitability or reactivity, unless the waste has been treated to render it non-ignitable or nonreactive. For such wastes, the Permittee shall follow testing procedures used to determine ignitability and reactivity as specified in Waste Analysis Plan [A.R. 06074]. This restriction on disposal of ignitable waste does not apply to ignitable waste disposed in accordance with 40 CFR 264.312(b).

Note: Cyanide or sulfide bearing waste as defined in 40 CFR 261.23(a)(5) may be packaged in accordance with 40 CFR §264.316 and disposed without first being treated or rendered nonreactive.

VI.B.3.

The Permittee shall operate landfill units L-12, L-13, and L-14 in accordance with the operating practices in Standalone Document No. 14, Landfill Design and Operations Plan [A.R. 06087].

VI.B.4.

The Permittee shall maintain a permanent accurate record of the approximate three dimensional location of each hazardous waste type, based on grid coordinates, within units L-12, L-13 and L-14 in accordance with 40 CFR 264.309. This record shall include the information necessary to locate a specific hazardous waste type and shall be based on information contained in the manifest (generator identification number, waste code, and date of disposal). This Condition shall apply to all wastes placed in units L-12, L-13 and L-14, irrespective of the date of disposal. Upon final closure of the Facility, the Permittee shall submit copies of these records for units L-12, L-13, and L-14 to the Manager.

VI.B.5.

‡ **Rev. 9** Liquid in the primary leachate collection system of unit L-12, L-13, or L-14 will not exceed 30 cm (one foot) in depth over the primary liner after waste has been placed. (This does

not include the area of the sump used to accumulate sufficient quantities of liquid for pumping). Liquid in the secondary leachate collection system of unit L-12, L-13, and L-14, will be removed, when pumpable quantities exist, to the extent practicable, within 24 hours after those quantities are found. The leachate from both the primary and secondary leachate collection systems will be managed for dust suppression within the footprint of the landfill from which the leachate originated per Standalone Document 14 – Landfill Design and Operations Plan. Leachate application shall be inspected daily to assure that the application is conducted in a controlled manner to prevent ponding and runoff. Leachate not used for dust suppression will be managed as hazardous waste and routed to the wastewater treatment unit. During the post-closure period, after final Facility closure, liquid from the secondary leachate collection systems shall be pumped, as described above, within 72 hours after such liquid is found.

VI.B.6.

For landfills units L-12, L-13, and L-14, the Permittee shall follow the procedures specified in Standalone Document No. 15, Landfill Response Action Plan [A.R. 06088].

VI.B.7.

The Permittee shall close units L-12, L-13, and L-14 in accordance with the applicable sections of Standalone Document No. 5, Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance [A.R. 06078], Standalone Document No. 16, Construction Quality Assurance Plan [A.R. 06088] and Standalone Document No. 17, Landfill Final Cover Design Plans [A.R. 06090], and Permit Condition II.J.

‡ Rev 28

VI.B.7.a

When implementing the evapotranspiration final cover alternative, the Permittee shall follow the fertilizer and soil amendments recommended by A&L Western Agriculture Laboratories as contained in Appendix B.3 of the Alternative Final Cover Design Report for Landfills L-12, L-13 and L-14 included in standalone 17.

VI.B.8.

The Permittee shall close units L-13, L-12, and L-14 in accordance with 40 CFR 264.19 and Standalone Document No. 16, Construction Quality Assurance Plan [A.R. 06089].

VI.B.9.

The Permittee shall follow the requirements for post-closure care of units L-12, L-13, and L-14 in accordance with the applicable sections of Standalone Document No 5, Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance [A.R. 06078] and Section II.L. of this Permit. The post-closure care period for each unit shall begin at the time of completion of closure of each unit.

VI.B.10.

The landfill units shall be operated and maintained using best management practices designed to prevent fires, pyrophoric events, explosions, combustion, or conflagration within the footprint of any operating landfill. ‡ **Rev. 3**

VI.C. Waste Pile WP-1 ‡ Rev. 23

VI.C.1.

The Permittee is authorized to process and store concrete wastes from the Umatilla Demilitarization Demolition Project in accordance with the provisions of Standalone Document 21 – Waste Pile Operations Plan.

VI.C.2

The Permittee shall inspect the Waste Pile WP-1 in Accordance with Standalone Document 1- Inspection Plan

VI.C.3

The Permittee will monitor the Waste Pile WP-2 in accordance with Standalone Document 7 – Groundwater Monitoring Plan

VI.C.4

The Permittee will close the Waste Pile WP-2 in accordance with Standalone Document 21 – Waste Pile Operations Plan

VI.C.5

The Permittee will maintain Closure Post Closure Financial Assurance for Waste Pile WP-1 in accordance with Standalone Document 5 – C-PC Plan

VI.D. [Reserved]

VI.E. Acceptance, Storage, Treatment, and Disposal of Corrective Action Management Unit [CAMU]-Eligible Wastes

VI.E.1.

The Permittee is authorized to accept, store, treat, and dispose of CAMU-eligible wastes, as defined at 40 CFR 264.552(a)(1), in accordance with Permit Conditions VI.E.2. through VI.E.12.

VI.E.2.a.

In addition to the approved Waste Analysis Plan requirements: For each single-type CAMU remediation waste acceptance, the Permittee shall investigate and determine that the authority that designated the waste as CAMU-eligible waste is authorized for such designation in accordance with either being an US EPA regional office or state authorized by 40 CFR Part 271. The results of the investigation, which may include hand-written notes from phone calls, shall be placed in the operating record.

VI.E.2.b.

In addition to the approved Waste Analysis Plan requirements: For single CAMU remediation wastes, the Permittee shall investigate and determine if the regulatory authority that designated the waste as CAMU-eligible waste provided a public notice and an opportunity for public comment. The results of the investigation, which may include hand-written notes from phone calls, shall be placed in the operating record.

VI.E.3.

The Permittee shall comply with the requirements of 40 CFR 268.7(b)(4) except the certification shall state that the CAMU-eligible wastes meet the treatment standards in 40 CFR 264.555(a)(2).

VI.E.4.

The Permittee shall dispose all CAMU-eligible waste in either landfill L-12, L-13, or, L-14.

VI.E.5.

All CAMU-eligible wastes that are disposed in a landfill shall meet any of the standards in 40 CFR 264.555(a)(2)(i), (ii), or (iii).

VI.E.6.

For new single CAMU-eligible wastes proposed to be received at the Facility, the Permittee shall notify the Department and persons on the Facility's mailing list of the Permittee's intent to receive the waste unless exempted in accordance with Permit Condition VI.E.9. The Permittee shall abide by all conditions in any Department exemption letter.

VI.E.7.

In the notification to the Department and the Facility mailing list regarding the Permittee's intent to receive CAMU-eligible wastes at the Facility, the Permittee shall state the source of the CAMU-eligible waste, the principal hazardous constituents in the waste, and the treatment requirements. The notification shall state that there will be a 15-day period after receipt of the notification for public comment. The notification shall state that any comments should be sent to the Department and that any comment may include an objection to receipt of the CAMU-eligible waste.

VI.E.8.a.

The Permittee may not receive any CAMU-eligible waste within the 15-day comment period specified in Permit Condition VI.E.7., and may not receive CAMU-eligible waste until the Department notifies the Permittee that the Department does not object to placement of the CAMU-eligible waste in the landfill. The Department may take a 30-day review period, with a possible 30-day extension because of public concerns or insufficient information, from the date of the Permittee's notice of intent to receive the CAMU-eligible waste.

VI.E.8.b.

The Department may object to the Permittee's placement of any single-type remediation CAMU-eligible waste stream. If the Department notifies the Permittee that the Department objects, the Permittee may not receive the single CAMU-eligible waste. If, at the end of the review period, the Department has not notified the Permittee that the Department has chosen not to object, the Permittee may not receive the single remediation CAMU-eligible waste until the objection has been resolved, or, the Permittee obtains a permit modification in accordance with 40 CFR 270.42 specifically authorizing receipt of the single remediation CAMU-eligible waste.

VI.E.9.

Upon an approved permit modification submitted by the Permittee, the Department may modify, reduce, or eliminate the notification requirements of Permit Condition VI.E.6. and VI.E.7. The Department's written decision will be based on minimal risk.

VI.E.10.

The Permittee may accept Rhone Poulenc (ORD 990 659 492) granular activated carbon remediation wastes as specifically described in the permit modification request, dated October 4,

2004. Such wastes shall be containerized when disposed of in a landfill. Such containers shall remain intact during disposal and when covered by operational lifts.

VI.E.11.

[Reserved]

VI.E.12.

The Permittee may accept and dispose the single remediation granular activated carbon CAMU-eligible wastes, as described in the permit modification request, dated October 4, 2004, from the Union Pacific Railroad Tie Treating Facility [UPRTTF], EPA ID ORD 982 658 742, The Dalles, Oregon. All CAMU-eligible wastes from the UPRTTF facility shall be disposed by macro encapsulation in accordance with this Permit and Standalone Document No 11, the Debris Treatment Plan [A.R. 06084].

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VII. CONTAINMENT BUILDING STORAGE AND TREATMENT

VII.A.1.a

The Permittee is authorized to store and treat any non-liquid wastes listed under Permit Condition II.C.5 and II.C.5.a.i.-v. and the second, third and fourth sentences in Permit Condition II.C.5.b.i. in containment buildings B-1, B-2, B-4 B-5, and B-9 including crushing and size reduction.

VII.A.1.b.

The Permittee shall not store hazardous wastes listed under Permit Condition II.C.5.b.ii. in containment buildings and shall not treat hazardous wastes listed in the first sentence under Permit Condition II.C.5.b.i. in containment buildings.

VII.A.2.

The Permittee shall operate and maintain all containment buildings in accordance with Standalone Document No. 12, Containment Buildings Design and Operations Plan [A.R. 06085] and all applicable requirements contained in 40 CFR 264 Subpart DD. Bioremediation in containment buildings authorized for the storage and treatment of hazardous wastes containing free liquids shall be conducted in accordance with Standalone Document No. 19, Bioremediation Facility and Organic Recovery Unit Design and Operations Plan [A.R. 06092].

VII.A.3.

The Permittee may store and treat wastes containing free liquids in containment building B-5.

VII.A.4.

The Permittee is authorized to operate and maintain its Organic Recovery Unit and associated ancillary equipment including tanks, containment and flare in accordance with Standalone Document No. 19, Bioremediation Facility and Organic Recovery Unit Design and Operations Plan as approved by the Department. ‡ ‡ **Rev. 12**

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VIII. (removed ‡Rev. 25)

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IX. PAST PRACTICE UNITS ‡ Rev. 15

IX.A. Definition of Past Practice Units

IX.A.1

Past practice units at this Facility shall consist of landfill units L-1, L-3, L-5, and L-6.

IX.B. Post-Closure Care of Landfill Units L-1, L-3, L-5, and L-6

IX.B.1.

The Permittee shall implement a detection groundwater monitoring program for the past practice units which complies with the requirements of Section X of this Permit. Monitoring well locations for the past practice units are listed in Table X-1 of this Permit and are displayed on Figure 1 of this Permit. Monitoring well sampling frequencies are specified in Table X-1 of this Permit.

IX.B.2.

The Permittee shall follow the post-closure care maintenance procedures outlined in Standalone Document No. 5, Closure/Post-Closure Plan, Cost Estimates, Financial Assurance, Insurance [A.R. 06078] for past practice units L-1, L-3, L-5, and L-6.

IX.C. Corrective Action for Past Practice Units L-1, L-3, L-5, and L-6

The Permittee shall follow the requirements in Permit Conditions X.D.4. through X.E.5. in response to a confirmed exceedance of the detection monitoring criteria as specified in Permit Conditions X.D.1. through X.D.3.

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X. GROUNDWATER DETECTION MONITORING PROGRAM‡ Rev. 15

X.A. Monitoring Well/Piezometer Locations

X.A.1.

The Permittee shall maintain a groundwater detection monitoring program as specified below at the locations for detection monitoring that are listed in Table X-1 of this Permit and displayed on Figure 1 of this Permit. [40 CFR 264.97 and 264.98]

X.A.2.

The Permittee shall maintain the network of piezometers, for the purpose of determining groundwater elevations, at the locations listed in Table X-2 of this Permit and displayed on Figure 1 of this Permit.

X.A.3.

The point of compliance is the vertical surface located at the hydraulically down gradient boundary of the Waste Management Areas listed in Table X-1. [40 CFR 264.95].

X.B. Well Construction, Maintenance, Replacement and Decommissioning

X.B.1.

The Permittee shall maintain the monitoring wells and piezometers identified in Permit Conditions X.A.1. and X.A.2., in accordance with Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080].

X.B.2.

All new and replacement monitoring wells and piezometers shall be drilled and constructed as approved by the Department. A well installation work plan shall be submitted to the Department, for approval, for all new and replacement monitoring wells and piezometers. The Permittee may not begin drilling until Department approval has been granted. All new and replacement monitoring wells and piezometers shall be designed, constructed, and installed in accordance with Oregon Water Resources

Department rules OAR 690-240; and, as appropriate, in general accordance with current guidance from the Department and the Environmental Protection Agency for drilling and construction of groundwater monitoring wells. Minor changes to the well installation work plan shall not be considered a Permit modification.

The Permittee shall take all reasonable precautions during drilling to prevent cross contamination between any water-bearing hydrologic zone and the geologic zones overlying and underlying the water-bearing hydrologic zone.

X.B.3.

The Permittee shall maintain all monitoring wells and piezometers in good working order, making necessary repairs in a timely manner so that sampling activities do not occur outside the sampling timeframes specified in Permit Condition X.C.2.a. The Permittee shall maintain an adequate supply of replacement parts and repair equipment so that each groundwater sampling event [as defined in Permit Condition X.C.2.a.] is not unreasonably delayed. The Permittee shall maintain a list of spare parts and equipment that will fulfill the terms of this Permit Condition.

This list shall be approved by the Department. The Department's approval under this Permit Condition shall not be considered a Permit modification.

X.B.4.

The Permittee shall follow the procedures in Table 3-2 of Standalone Document No. 3, Inspection Plan [A.R. 06076] and in Section 3.4 of Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080] for routine inspection of monitoring wells and piezometers.

X.B.5.

The Permittee shall maintain borehole integrity of each monitoring well and piezometer for any groundwater monitoring program developed to satisfy 40 CFR 264.98, 264.99 and 264.100, as required by 40 CFR 264.97(c). The Permittee shall inspect groundwater wells at the Facility not identified in the previous sentence at least once every five years beginning August 1, 2007 as provided in Section 3.4 of Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080].

X.B.6.

Any replacement monitoring wells or piezometers that may be required during the life of this Permit shall be installed as close as appropriate and practicable to the monitoring well or piezometer being taken out of service. If a monitoring well or piezometer shall be replaced for any reason during the term of this Permit, it shall be replaced within 90 calendar days of the date taken out of service unless the Department approves a longer period of time.

X.B.7. All new or replacement groundwater sampling pumps shall be dedicated bladder pumps unless the Department approves use of another type of pump or sampling device in writing. The Department's approval under this Permit Condition shall not be considered a permit modification.

X.B.8.

All monitoring wells or piezometers that require decommissioning shall be decommissioned in accordance with Oregon Water Resources Department rules OAR 690-240 and, as appropriate, in general accordance with current guidance from the Department and the Environmental Protection Agency for decommissioning groundwater monitoring wells. Written approval for monitoring well or piezometer decommissioning is required from the Department. Monitoring well or piezometer decommissioning documentation, as required by OAR 690-240-0510(6), shall be submitted to the Department within 60 calendar days after completion of decommissioning.

X.B.9.

By written direction from the Department, the Permittee shall decommission monitoring wells or piezometers in the groundwater monitoring program developed to satisfy 40 CFR 264.98, 264.99 and 264.100, that do not meet the requirements in 40 CFR 264.97(c). In determining whether to issue the written direction, the Department will consider the Permittee's evaluation, if any, for whether the monitoring well(s) or piezometer(s) meets the requirements in 40 CFR 264.97(c).

X.B.10.

The Permittee shall submit to the Department within 60 calendar days of installation of any new or replacement monitoring well or piezometer (or group of monitoring wells or piezometers), or decommissioning of an existing monitoring well or piezometer (or group of monitoring wells or piezometers), revised versions of Table X-1, Table X-2, and Figure 1. The Permittee shall obtain a Permit modification for any new or replacement monitoring well.

X.C. Program Operation

X.C.1.

Groundwater Elevations and Flow Direction

X.C.1.a.

The Permittee shall determine the elevation of the groundwater surface at each monitoring well and piezometer listed in Table X-1 and Table X-2 of this Permit, each time the groundwater is sampled. [40 CFR 264.97(f)]

X.C.1.b.

Groundwater level measurements for each monitoring well shall be obtained prior to purging the well. In order to minimize the potential for error caused by temporal variations, the Permittee shall obtain all water level measurements within as short a time as practicable. On each day that water level measurements are being collected under this Permit Condition, the barometric pressure shall be recorded and entered into the operating record.

X.C.1.c.

The Permittee shall use these data to determine the rate and direction of groundwater flow at each Waste Management Area annually, and construct groundwater elevation (or potentiometric surface) contour maps for Level 1 and Level 2 of the Selah Aquifer annually. The contour maps and flow rates shall be submitted to the Department in the second semi-annual monitoring report. The Permittee shall submit, with the contour maps, a written review of the adequacy of the groundwater monitoring system relative to observed groundwater flow directions with respect to each Waste Management Area.

X.C.1.d.

Graphs of groundwater elevation vs. time will be submitted annually, in the second semi-annual monitoring report, for all monitoring wells listed in Table X-1 and all piezometers listed in Table X-2, including all available historical groundwater elevation data.

X.C.2. Groundwater Sampling and Analysis

X.C.2.a.

The Permittee shall obtain water quality samples from each detection monitoring well listed in Table X-1 of this Permit and displayed on Figure 1 of this Permit at the frequencies designated on Table X-1 of this Permit, in accordance with the procedures in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080]. Semiannual groundwater sampling events shall be started and finished in the months of March through May, and September through November, respectively, during each calendar year. For all semiannual, annual, and all other groundwater sampling events, the Permittee shall notify the Department within five (5) working days prior to the sampling event.

X.C.2.b.

The Permittee shall analyze all groundwater samples obtained under Permit Condition X.C.2.a. for the constituents and parameters listed in Table X-3 of this Permit, using procedures specified in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080].

X.C.2.c.

Results of all analyses, including semiannual analyses, verification analyses, and Appendix IX analyses, shall be submitted to the Department within 45 calendar days after the Permittee's receipt of the analytical laboratory's quality-assured data report. In

no case shall the period between the last date of sampling and the date of submission to the Department of analytical results exceed 90 calendar days unless a written extension is granted by the Department. The Permittee shall document when the analytical laboratory's quality-assured data reports are received. The report submitted to the Department shall contain laboratory quality-assured results (as specified in the Standalone Document No.7, Groundwater Monitoring Plan [A.R. 06080] reported down to the method detection limit (MDL), and the reporting limit (RL) as specified in Standalone Document No.7, Groundwater Monitoring Plan [A.R. 06080]. The MDL results are for informational purposes and will be discussed in the reports for each sampling event, as described in the Groundwater Monitoring Plan.

X.C.2.d.

Semiannual groundwater monitoring reports shall also include the information listed in Section 7.2 of Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080].

X.C.2.e.

The Permittee shall enter all monitoring, testing, and quality-assured analytical data obtained pursuant to Permit Condition X.C. in the operating record as required by Permit Condition I.M. Upon written request by the Department, these results shall be submitted within 30 calendar days after the Permittee's receipt of the request, provided the Permittee has received the analytical laboratory's quality-assured data report. ‡ **Rev. 16**

X.D. Data Evaluation

X.D.1.

The results of analyses obtained pursuant to Permit Condition X.C.2. shall be compared to the following detection monitoring criteria for the Volatile Organic Constituents (VOCs) listed in Table X-3:

X.D.1.a.

For Chloromethane; Dichlorodifluoromethane; Dichloroethane,1,1-; Methylene chloride; Tetrachloroethene; Toluene; Trichloroethane,1,1,1-; Trichloroethene; and Trichlorofluoromethane in detection monitoring wells 3R-2, 4B-1, 5D-1, and 5Q-1 each detection monitoring criterion listed in Table X-4 multiplied by five; or

X.D.1.b.

For all other detection monitoring wells not included in Permit Condition X.D.1.a., the detection monitoring criteria listed in Table X-4.

X.D.1.c.

For any VOCs detected in detection monitoring wells 3R-2, 4B-1, 5D-1, or 5Q-1 that are degradation products of Chloromethane; Dichlorodifluoromethane; Dichloroethane,1,1-; Methylene chloride; Tetrachloroethene; Toluene; Trichloroethane,1,1,1-; Trichloroethene; and Trichlorofluoromethane, the Permittee may add those VOCs to Permit Condition X.D.1.a. after Department approval.

X.D.2.

Upon determination of VOCs in any monitoring well exceeding the applicable criteria specified in Permit Condition X.D.1. of this Permit, the Permittee shall:

X.D.2.a.

Notify the Department of this finding, in writing, within 7 calendar days after receiving the analytical laboratory's quality-assured data report [40 CFR 264.98(g)(1)]; and,

X.D.2.b.

Within 30 calendar days after this finding, collect two samples from any affected monitoring well(s), following the procedures identified in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080], and reanalyze the samples for all VOCs specified in Table X-3 of this Permit that exceeded the applicable criteria in Permit Condition X.D.1. In no case shall the period between the date of the determination under Permit Condition X.D.2. and the date of the submission to the Department of the analytical results for the sampling under this Permit Condition exceed 135 calendar days unless a written extension is granted by the Department.

X.D.2.c.

The Permittee may elect to forgo verification sampling activities described under Permit Condition X.D.2.b. and instead follow the requirements of Permit Condition X.D.4.

X.D.3.

If the analytical laboratory's quality-assured data results from the analyses in Permit Condition X.D.2.b. show that:

X.D.3.a.

Neither verification sample confirms the detection of VOCs above the applicable detection monitoring criteria specified in Permit Condition X.D.1., the Permittee shall resume detection monitoring according to the schedule in Permit Condition X.C.2.a. and notify the Department in writing that the detection monitoring program is being resumed; or

X.D.3.b.

One or both verification samples confirm the detection of VOCs above the applicable detection monitoring criteria specified in Permit Condition X.D.1., the Permittee shall follow the requirements of Permit Condition X.D.4.

X.D.4.

Response to Confirmed Exceedance

X.D.4.a.

The Permittee shall notify the Department in writing that the detection monitoring criteria have been exceeded. This notification shall occur within 7 calendar days after receipt of the analytical laboratory's quality-assured data report obtained in Permit Condition X.D.3.b., or within 7 calendar days after receipt of the analytical laboratory's quality-assured data report received under Permit Condition X.C.2. if the Permittee elects to forgo verification sampling as provided in Permit Condition X.D.2.c.; and

X.D.4.b.

The Permittee shall sample the affected monitoring well(s) within 30 calendar days after receipt of the analytical laboratory's quality-assured data report obtained in Permit Condition X.C.2., or

within 30 calendar days of receipt of the analytical laboratory's quality-assured data report received under Permit Condition X.C.2. if the Permittee elects to forgo verification sampling as provided in permit Condition X.D.2.c., and analyze for the constituents identified in 40 CFR Part 264 Appendix IX.

X.D.4.c.i.

If any Appendix IX constituents not listed in Table X-3 of this Permit are detected above the applicable detection monitoring criteria as specified in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080], the Permittee may resample within 30 calendar days after receipt of the analytical laboratory's quality-assured data report and repeat the Appendix IX analysis for any new constituents detected above the applicable detection monitoring criteria. If the second analysis confirms the presence of new constituents above the applicable detection monitoring criteria, the Permittee shall report the concentrations of these detected constituents to the Department within 7 calendar days after receipt of the analytical laboratory's quality-assured data report for the second analysis.

X.D.4.c.ii.

If the Permittee chooses not to resample, then the Permittee shall report the concentrations of the additional constituents detected above the applicable detection monitoring criteria to the Department within 7 calendar days after receipt of the analytical laboratory's quality-assured data report for the samples collected under Permit Condition X.D.4.b.

X.D.4.d.

Within 90 calendar days after receipt of the analytical laboratory's quality-assured data report for Appendix IX constituents required under Permit Condition X.D.4.b., the Permittee shall submit either of the following:

X.D.4.d.i.

An application for a permit modification to establish a compliance monitoring program, for the affected monitoring well(s), as specified in 40 CFR 264.98(g)(4), or, if any hazardous constituents are above the groundwater concentration limits, to initiate a corrective action program, as specified in Permit Condition X.E. unless the Permittee has submitted a notice of intent under 40 CFR 264.98(g)(4)(iv) to revise the groundwater concentration limits or,

X.D.4.d.ii.

A report demonstrating that a source other than a regulated unit or the past practice units caused the contamination, or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater; and in addition, when required by 40 CFR 264.98(h), an application for a permit modification to make any appropriate changes to the detection monitoring program.

X.D.4.e.

If the Department determines that a report submitted in accordance with condition X.D.4.d.ii. fails to identify a source of contamination other than a regulated unit or past practice unit, or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the ground water, then the Permittee shall within 60 days of the Department's determination submit an application for a permit modification to establish a compliance monitoring program, as specified in 40 CFR 264.98(g)4, or, if any hazardous constituents are above the groundwater concentration limits, to initiate corrective action, as specified in Permit

Condition X.E. unless the Permittee has submitted a notice of intent under 40 CFR 264.98(g)(4)(iv) to revise the groundwater concentration limits.

X.D.5.

[Reserved]

X.E. Corrective Action Process

X.E.1.

Upon exceedance of the groundwater concentration limit(s), as determined by Permit Conditions X.D.4.d. or X.D.4.e., the Permittee shall send a written request to the Department's Eastern Region Environmental Cleanup Manager requesting a meeting. The written request shall be sent within 15 calendar days after it is determined that the groundwater protection standard(s) has been exceeded. The written request shall also contain the following information:

X.E.1.a.

Description of release with information known to date,

X.E.1.b.

Description of Permittee's obligation to notify the Environmental Cleanup Manager about the release in accordance with this Permit, and,

X.E.1.c.

Description of Permittee's duty to initiate corrective action in accordance with this Permit if any groundwater concentration limit(s) is exceeded.

X.E.2.

The Permittee shall meet with the Department's Eastern Region Environmental Cleanup Program within 45 calendar days after the date on the written notification sent in accordance with Permit Condition X.E.1. unless the Department approves a longer time period (which approval shall not be considered a modification of this Permit). Such a meeting is intended to initiate development of a corrective action written agreement for the Facility.

X.E.3.

The Permittee shall enter into a written agreement with the Department's Eastern Region Environmental Cleanup Program within 180 calendar days after the date on the written notification sent in accordance with Permit Condition X.E.1. The agreement shall provide that any corrective action be implemented under OAR 340-122 consistent with the requirements of 40 CFR 264.90 to 264.101. The agreement shall also provide that in the event of disagreement between the Permittee and Department regarding whether any action under the agreement is consistent with or exceeds 40 CFR 264.90 to 264.101, the Permittee and Department shall make a good faith effort to resolve the dispute by taking the following actions: (a) discussing the dispute between the Permittee's Environmental Manager and the Department's Project Manager, (b) if necessary, referring the dispute for resolution to the Permittee's Facility Manager and the Department's Cleanup Manager; and (c) if necessary, providing each other their respective positions in writing and referring the dispute for resolution by the Department's Eastern Region Administrator, in consultation with the Permittee's Market Area Manager. ‡ **Rev. 3**

X.E.4.

The agreement entered into under Permit Condition X.E.3. shall be processed as a Class 3 Permit modification and shall be considered an enforceable Condition of this Permit.

X.E.5.

During the course of the corrective action agreement, the Department may determine it necessary to revise the agreement or corrective action activities conducted under the agreement. Changes to the agreement, or corrective action activities conducted under the agreement that are implemented after the effective date of this Permit may require a modification to the Permit. The Permittee shall notify the Manager in writing at least 30 days prior to any planned changes to the agreement or corrective action activities conducted under the agreement. Upon notification by the Permittee, the Manager will determine whether or not a Permit modification will be needed. If a Permit modification is needed, the Manager shall so notify the Permittee, and upon receipt of such notice, the Permittee shall proceed with a Permit modification in accordance with the procedures set forth in 40 CFR 270.41 and 270.42, incorporated by reference under OAR 340-100-0002 and as modified by OAR -105-0041 and OAR 340-106-0005. In accordance with 40 CFR 270.42(e), as incorporated by reference under OAR 340-100-0002, the Permittee may seek, and the Manager may grant, temporary authorization to implement changes to the agreement or corrective action activities conducted under the agreement prior to the final approval of a Permit Modification.

X.E.6.

The agreement or corrective action activities conducted under the agreement, may be modified at any time under the Department's Environmental Cleanup Program authority pursuant to the agreement, provided the Permittee complies with the requirements of X.E.5. The Department's Environmental Cleanup Program authority to implement changes to the agreement, or corrective action activities conducted under the agreement, shall not be restricted or hindered by any requirements to modify this Permit. Changes approved under the Department's Environmental Cleanup program authority and implemented by the Permittee shall not be a violation of any condition of this Permit or any requirement to modify this Permit provided the Permittee complies with the requirements of X.E.5.

X.E.7.

The requirement to modify this Permit to accommodate changes in the agreement or corrective action conducted under the agreement shall not be in any way interpreted or deemed to replace, supersede, supplant, modify, or amend the Permittee's right to dispute resolution under the agreement.

X.E.8.

If, after the conclusion or stabilization of corrective action activities, either the Permittee or the Department determines that the Facility should return to a compliance monitoring program, the Permittee must submit a permit modification request to institute a renewed compliance monitoring program under this Permit.

X.F. Post Closure Monitoring

X.F.1.

All procedures described in Section X of this Permit shall apply to the post-closure care period, as well as the active life period of each regulated unit or waste management area.

X.G. Request for Permit Modification

X.G.1.

If the Permittee determines the detection monitoring program no longer satisfies the requirements of 40 CFR 264.98, then within 90 calendar days the Permittee shall submit an application for a permit modification to make any appropriate changes to the detection monitoring program. [40 CFR 264.98(h)]‡ **Rev. 17**

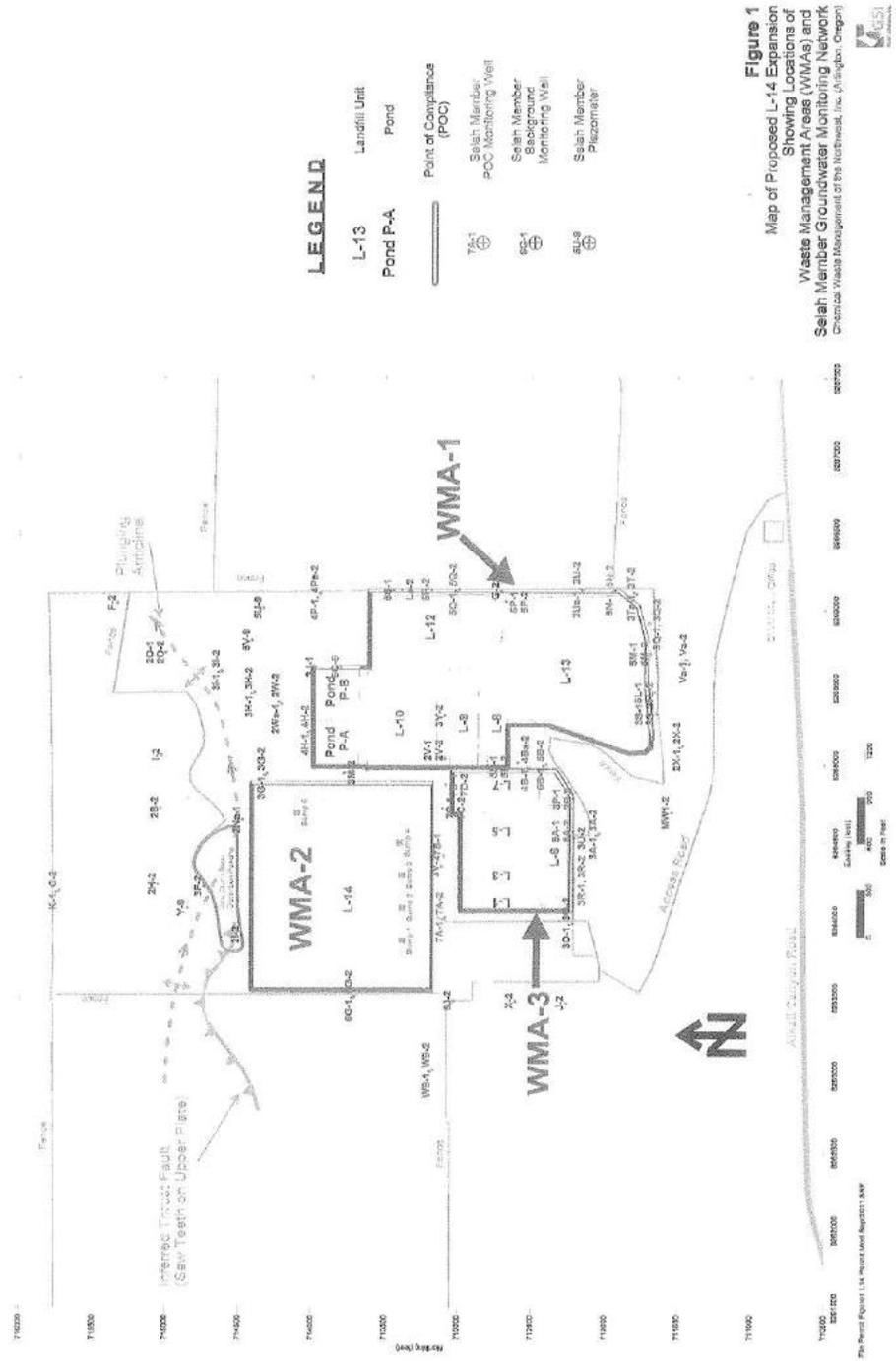


Figure 1 Map of Proposed L-14 Expansion

TABLE X-1

Table X-1 (REV.25)						
Detection Monitoring Well Locations and Sampling Frequency						
Monitoring Well ID	Location [a] Northing	Eastings	TOC Elevation (ft) [a,b]	TSCA Monitoring Frequency	RCRA Monitoring Frequency	Post-Closure Monitoring
WASTE MANAGEMENT AREA WMA-1						
La-2	713381.50	8266135.26	1037.74	Annual	Annual	Yes
2Ua-1	712177.95	8266132.81	1031.35	Annual	Semiannual	Yes
2U-2	712168.56	8266133.98	1031.39	Annual	Annual	Yes
3Q-1	711698.46	8265913.55	1027.28	Annual	Semiannual	Yes
3Q-2	711688.30	8265906.11	1027.36	Annual	Annual	Yes
3S-1	711649.76	8265331.87	991.57	Annual	Semiannual	Yes
3S-2	711649.23	8265321.93	990.86	Annual	Annual	Yes
3Ta-1	711780.29	8266107.22	1029.90	Annual	Semiannual	Yes
3T-2	711783.71	8266096.76	1030.26	Annual	Annual	Yes
5L-1	711656.26	8265469.62	1002.39	Annual	Semiannual	Yes
5L-2	711655.68	8265480.21	1002.85	Annual	Annual	Yes
5M-1	711689.41	8265721.27	1021.38	Annual	Semiannual	Yes
5M-2	711666.90	8265719.81	1019.23	Annual	Annual	Yes
5N-1	711930.00	8266133.57	1031.72	Annual	Semiannual	Yes
5N-2	711938.57	8266133.94	1031.92	Annual	Annual	Yes
5P-1	712673.72	8266058.07	1025.56	Annual	Semiannual	Yes
5P-2	712686.52	8266049.02	1024.90	Annual	Annual	Yes
5Q-1	712993.93	8266138.51	1035.65	Annual	Semiannual	Yes
5Q-2	713005.74	8266139.00	1035.81	Annual	Annual	Yes
5R-2	713176.05	8266137.78	1037.33	Annual	Annual	Yes
5S-1	713441.01	8266134.93	1037.87	Annual	Semiannual	Yes
6C-9	713801.00	8265639.00	1018.66	Not Required	Semiannual	No
WASTE MANAGEMENT AREA WMA-2						
3V-2	713104.08	8264349.12	1001.26	Annual	Annual	Yes
4H-1	714000.38	8265225.41	1021.43	Annual [c]	Semiannual [d]	Yes
4H-2	713999.85	8265214.75	1021.29	Annual [c]	Annual [c]	Yes
7A-1	713074.69	8264024.77	990.47	Annual	Semiannual	Yes
7A-2	713076.45	8264015.95	990.11	Annual	Annual	Yes
7B-1	713091.15	8264418.42	1003.59	Annual	Semiannual	Yes
7C-1	713103.22	8264745.81	1018.13	Annual	Semiannual	Yes
7C-2	713102.18	8264733.31	1017.38	Annual	Annual	Yes
7D-1	713082.85	8264881.81	1022.18	Annual	Semiannual	Yes
7D-2	713085.44	8264870.37	1021.72	Annual	Annual	Yes
2E-9	714386.23	8265469.54	1017.96	Not Required	Semiannual	No
3H-1	715031.29	8264077.75	1016.62	Not Required	Semiannual	No

Table X-1 (Cont.) (REV. 25)
Detection Monitoring Well Locations and Sampling Frequency

WASTE MANAGEMENT AREA WMA-3

Monitoring Well ID	Location [a] Northing	Eastings	TOC Elevation (ft) [a,b]	TSCA Monitoring Frequency	RCRA Monitoring Frequency	Post- Closure Monitoring
3P-1	712209.42	8264785.41	1025.84	Not Required	Semiannual	Yes
3P-2	712211.09	8264794.07	1026.65	Not Required	Annual	Yes
3R-1	712204.75	8264256.48	1010.90	Not Required	Semiannual	Yes
3U-2	712206.37	8264530.24	1014.45	Not Required	Annual [c]	Yes
4B-1	712592.50	8265015.07	1027.88	Annual	Semiannual	Yes
4Ba-2	712581.78	8265015.06	1028.29	Annual	Annual	Yes
5A-1	712212.18	8264574.73	1017.04	Not Required	Semiannual	Yes
5A-2	712190.02	8264593.74	1017.41	Not Required	Annual	Yes
5B-1	712395.18	8265005.39	1026.36	Annual	Semiannual	Yes
5B-2	712321.89	8264986.63	1026.72	Annual	Annual	Yes
5D-1	712805.20	8264991.15	1033.34	Annual	Semiannual	Yes
5D-2	712825.81	8264994.29	1033.38	Annual	Annual	Yes

BACKGROUND WATER QUALITY WELLS

6G-1	713699.93	8263511.11	995.70	Annual [c]	Semiannual [d]	Yes
6G-2	713709.26	8263512.21	995.87	Annual [c]	Semiannual [d]	Yes

Notes:

[a] RUST 1994 Survey; Oregon State Plane, North American Datum 1983-1991

[b] Top of casing elevation relative to mean sea level

[c] Quarterly for first 2 years of monitoring, then annual

[d] Quarterly for first 2 years of monitoring, then semiannual

TABLE X-2

Table X-2 (REV.25)				
Piezometer Locations				
Monitoring Well ID	Location [a]		TOC Elevation [b]	Aquifer Level
	Easting	Northing		
K-1	8264181.39	715712.29	1003.48	1
Va-1	8265656.61	711421.45	794.30	1
W9-1	8263032.76	713160.82	998.14	1
2Na-1	8264648.44	714468.80	983.89	1
2O-1	8265728.62	714993.49	1032.92	1
2Vb-1	8265035.42	713079.27	1030.23	1
2Wa-1	8265398.81	714177.28	1020.03	1
2X-1	8265124.28	711463.38	915.94	1
3A-1	8264557.93	712038.00	1012.61	1
3G-1	8264947.14	714300.29	1018.55	1
3I-1	8265611.36	714614.22	1009.28	1
3J-1	8265639.57	713970.21	1019.13	1
3O-1	8263981.08	712213.62	995.17	1
4P-1	8266115.12	713939.21	1038.98	1
Y-9	8264080.53	714843.09	1022.03	1 & 2
5U-9	8266018.49	714324.88	1037.76	1 & 2
5V-9	8265809.45	714405.50	1029.43	1 & 2

Table X-2 (cont.) (REV. 25)

Piezometer Locations

Monitoring Well ID	Location [a]		TOC Elevation [b]	Aquifer Level
	Easting	Northing		
C-2	8264187.28	715720.88	1004.45	2
F-2	8266048.01	715326.01	1048.33	2
G-2	8266127.52	712704.47	1024.31	2
I-2	8265065.70	715023.96	1010.78	2
J-2	8263466.71	712256.68	982.91	2
MW1-2	8264694.07	711538.99	930.84	2
Va-2	8265662.57	711426.10	912.25	2
W9-2	8263032.76	713160.82	998.19	2
X-2	8263481.30	712602.86	986.73	2
2B-2	8264724.72	715031.73	1008.12	2
2H-2	8264231.15	715047.16	1012.10	2
2I-2	8263904.32	714471.40	970.87	2
2O-2	8265728.62	714993.49	1032.95	2
2V-2	8265043.25	713084.27	1030.23	2
2W-2	8265398.63	714203.30	1018.37	2
2X-2	8265124.28	711463.38	915.95	2
3A-2	8264557.93	712038.00	1012.66	2
3F-2	8264216.78	714729.31	966.97	2
3G-2	8264947.47	714310.85	1018.31	2
3H-2	8265470.60	714396.38	1016.34	2
3I-2	8265610.45	714624.44	1010.16	2
3M-2	8264951.31	713766.84	1022.7	2
3O-2	8263990.41	712212.00	995.45	2
3Y-2	8265321.14	713083.81	1030.44	2
4Pa-2	8266105.95	713933.82	1037.78	2
6J-2	8263481.40	713020.15	994.58	2

Notes:
 [a] Oregon State Plane System
 [b] Top of casing elevation relative to mean sea level

TABLE X-3

Table X-3 Detection Monitoring Program Groundwater Sampling Constituents and Parameters			
Volatile Organic Constituents	CAS #		
Benzene	71-43-2		
Bromodichloromethane	75-27-4		
Bromoform	75-25-2		
Bromomethane	74-83-9		
Carbon disulfide	75-15-0		
Carbon tetrachloride	56-23-5		
Chlorobenzene	108-90-7		
Chlorodibromomethane	124-48-1		
Chloroethane	75-00-3		
Chloroform	67-66-3		
Chloromethane	74-87-3		
Dichlorodifluoromethane	75-71-8		
Dichloroethane, 1,1-	75-34-3		
Dichloroethane, 1,2-	107-06-2		
Dichloroethene, 1,1-	75-35-4		
Dichloroethene, trans-1,2-	156-60-5		
Dichloropropane, 1,2-	78-87-5		
Dichloropropene, cis-1,3-	10061-01-5		
Dichloropropene, trans-1,3-	10061-02-6		
Dioxane, 1,4	123-91-1		
Ethyl benzene	100-41-4		
Hexachlorobutadiene	87-68-3		
Methylene chloride	75-09-2		
Tetrachloroethane, 1,1,2,2-	79-34-5		
Tetrachloroethene	127-18-4		
Toluene	108-88-3		
Trichloroethane, 1,1,1-	71-55-6		
Trichloroethane, 1,1,2-	79-00-5		
Trichloroethene	79-01-6	TSCA Constituents	
Trichlorofluoromethane	75-69-4	Aroclor 1016	12674-11-2
Vinyl chloride	75-01-4	Aroclor 1221	11104-28-2
Field Parameters		Aroclor 1232	11141-16-5
pH	NA	Aroclor 1242	53469-21-9
Specific Conductance	NA	Aroclor 1248	12672-29-6
Temperature	NA	Aroclor 1254	11097-69-1
Depth to Water	NA	Aroclor 1260	11096-82-5

Samples shall be collected, analyzed, and evaluated in accordance with the Permit and Standalone Document No.7, Groundwater Monitoring Plan.

TABLE X-4

Table X-4 (REV.19)	
Detection Monitoring Criteria	
Volatile Organic Constituents	Criterion (µg/L)¹
Benzene	1
Bromodichloromethane	1
Bromoform	1
Bromomethane	2
Carbon disulfide	1
Carbon tetrachloride	1
Chlorobenzene	1
Chlorodibromomethane	1
Chloroethane	2
Chloroform	1
Chloromethane	2
Dichlorodifluoromethane	2
Dichloroethane, 1,1-	1
Dichloroethane, 1,2-	1
Dichloroethene, 1,1-	1
Dichloroethene, trans-1,2-	1
Dichloropropane, 1,2-	1
Dichloropropene, cis-1,3-	1
Dichloropropene, trans-1,3-	1
Dioxane, 1,4	20
Ethyl benzene	1
Hexachlorobutadiene	1
Methylene chloride	5
Tetrachloroethane, 1,1,2,2-	1
Tetrachloroethene	1
Toluene	1
Trichloroethane, 1,1,1-	1
Trichloroethane, 1,1,2-	1
Trichloroethene	1
Trichlorofluoromethane	2
Vinyl chloride	1

Table X-4 (cont) Detection Monitoring Criteria	
TSCA Constituents	Criterion (µg/L) ¹
Aroclor 1016	1 µg/L
Aroclor 1221	1 µg/L
Aroclor 1232	1 µg/L
Aroclor 1242	1 µg/L
Aroclor 1248	1 µg/L
Aroclor 1254	1 µg/L
Aroclor 1260	1 µg/L

Samples shall be collected, analyzed, and evaluated in accordance with the Permit and Standalone Document No.7, Groundwater Monitoring Plan.

¹The criterion listed in this table for each constituent is the reporting limit specified in Standalone Document No. 7. Reporting limits shown in this table assume that no sample dilution is necessary. Actual reporting limits may be higher if dilution is necessary or blank contamination is detected.

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XI. GROUNDWATER COMPLIANCE MONITORING PROGRAM‡ Rev. 15

XI.A. Monitoring Well Locations

XI.A.1.

If a groundwater compliance monitoring program is established as provided in Article X, the Permittee shall maintain a groundwater compliance monitoring program as specified below at the locations for compliance monitoring that are listed in Table XI-1 of this Permit and displayed on Figure 1 of this Permit.

XI.B Well Construction, Maintenance, Replacement and Decommissioning

XI.B.1.

The Permittee shall maintain the monitoring wells identified in Permit Condition XI.A.1. in accordance with the Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080] .

XI.B.2.

All new and replacement monitoring wells shall be drilled and constructed as approved by the Department. A well installation work plan shall be submitted to the Department, for approval, for all new and replacement monitoring wells. The Permittee may not begin drilling until Department approval has been granted. All new and replacement monitoring wells shall be designed, constructed, and installed in accordance with Oregon Water Resources Department rules OAR 690-240; and as appropriate, in general accordance with current guidance from the Department and the EPA for drilling and construction of groundwater monitoring wells. Minor changes to the well installation work plan shall not be considered a Permit modification. The Permittee shall take all reasonable precautions during drilling to prevent cross contamination between any water-bearing hydrologic zone and the geologic zones overlying and underlying the hydrologic zone.

XI.B.3.

The Permittee shall maintain all monitoring wells in good working order, making necessary repairs in a timely manner so that sampling activities do not occur outside the sampling timeframes specified in Permit Condition XI.C.1.a. The Permittee shall maintain an adequate supply of replacement parts and repair equipment so that each groundwater sampling event [as defined in Permit Condition XI.C.1.a.] is not unreasonably delayed. The Permittee shall maintain a list of spare parts and equipment that will fulfill the terms of this Permit Condition. This list shall be approved by the Department. The Department's approval under this Permit Condition shall not be considered a permit modification.

XI.B.4.

The Permittee shall follow the procedures in Table 3-2 of the Standalone Document No. 3, Inspection Plan [A.R. 06080], and in Section 3.4 of Standalone Document No.7, Groundwater Monitoring Plan [A.R. 06080], for routine inspection of monitoring wells.

XI.B.5.

The Permittee shall maintain borehole integrity of each monitoring well identified in Permit Condition XI.A.1, as required by 40 CFR 264.97(c).

XI.B.6.

Any replacement monitoring wells that may be required during the life of this Permit shall be installed as close as appropriate and practicable to the monitoring well being taken out of service. If a monitoring well shall be replaced for any reason during the term of this Permit, it shall be replaced within 90 calendar days of the date taken out of service unless the Department approves a longer time period.

XI.B.7.

All new or replacement groundwater sampling pumps shall be dedicated bladder pumps unless the Department approves use of another type of pump or sampling device in writing. The Department's approval under this Permit Condition shall not be considered a permit modification.

XI.B.8.

All monitoring wells that require decommissioning shall be decommissioned in accordance with Oregon Water Resources Department rules OAR 690-240 and, as appropriate, in general accordance with current guidance from the Department and Environmental Protection Agency for decommissioning of groundwater monitoring wells. Written approval for monitoring well decommissioning is required from the Department. Monitoring well decommissioning documentation, as required by OAR 690-240-0510(6), shall be submitted to the Department within 60 calendar days after completion of decommissioning.

XI.B.9.

By written direction from the Department, the Permittee shall decommission monitoring wells identified in Permit Condition XI.A.1. that do not meet the requirements in 40 CFR 264.97(c). In determining whether to issue the written direction, the Department will consider the Permittee's evaluation, if any, for whether the monitoring well meets the requirements in 40 CFR 264.97(c).

XI.B.10.

The Permittee shall submit to the Department within 60 calendar days of installation of any new or replacement monitoring well (or group of monitoring wells), or decommissioning of an existing monitoring well (or group of monitoring wells), revised versions of Table XI-1 and Figure 1. The Permittee shall obtain a Permit modification for any new or replacement monitoring well.

XI.C. Program Operation

XI.C.1. Groundwater Sampling and Analysis

XI.C.1.a.

The Permittee shall obtain water quality samples from each compliance monitoring well listed in Table XI-1 of this Permit and displayed as a compliance monitoring well on Figure 1 of this Permit, at the frequencies designated on Table XI-1 of this Permit, in

accordance with the procedures in the Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080]. Semiannual groundwater sampling events shall be started and finished in the months of March through May, and September through November, respectively, during each calendar year. The Permittee shall notify the Department within five (5) working days prior to the sampling event.

XI.C.1.b.

The Permittee shall analyze all groundwater samples obtained under Permit Condition

XI.C.1.a. for the constituents and parameters listed in Tables XI-2 and XI-3 of this Permit, using procedures specified in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080].

XI.C.1.c.

The Permittee shall triennially analyze the groundwater sampled from the compliance monitoring well with the highest total VOC concentration during the previous sampling event for all 40 CFR 264, Appendix IX constituents. Triennial sampling shall occur upon the commencement of compliance monitoring and every third year thereafter during the compliance period.

XI.C.1.c.i.

If any Appendix IX constituents are detected above the applicable detection monitoring criteria as specified in Permit Conditions X.D.1.a. and X.D.1.b. and these constituents are not already designated for compliance monitoring and listed in Tables XI-2 or XI-3 of this Permit, the Permittee may resample within 30 calendar days after receipt of the analytical laboratory's quality-assured data report and repeat the Appendix IX analysis for any new constituents not listed in Tables XI-2 or XI-3 that are detected above the applicable detection monitoring criteria. If the second analysis confirms the presence of new constituents above the applicable detection monitoring criteria, the Permittee shall report the concentrations of these detected constituents to the Department within 7 calendar days after receipt of the analytical laboratory's quality-assured data report for the second analysis.

XI.C.1.c.ii.

If the Permittee chooses not to resample, then the Permittee shall report the concentrations of the additional constituents detected above the applicable detection monitoring criteria to the Department within 7 calendar days after receipt of the analytical laboratory's quality-assured data report for the initial Appendix IX samples collected under Permit condition XI.C.1.c.

XI.C.1.c.iii.

The Permittee shall add any newly identified Appendix IX constituents under Permit Conditions XI.C.1.c.i. and XI.C.1.c.ii. to Table XI-3, if the concentration is above the applicable detection monitoring criteria, and submit the revised Table XI-3 to the Department for inclusion into the Permit. For any new Appendix IX constituents without a groundwater concentration limit in Table XI-4, the Permittee shall develop a groundwater concentration limit modifying the Permit in accordance with 40 CFR 270.42.

XI.C.1.d.

Results of all analyses, including semiannual analyses, annual analyses, verification analyses, and Appendix IX analyses, shall be submitted to the Department within 45 calendar days after the Permittee's receipt of the analytical laboratory's quality-assured data report. In no case shall the period between the last date of sampling and the date of submission to the Department of analytical results exceed 90 calendar days unless the Department approves a longer time period. The Permittee shall document when the analytical laboratory's quality-assured data reports are received. The report submitted to the Department shall contain laboratory quality-assured results (as specified in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080] reported down to the method detection limit (MDL), and the reporting limit (RL) as specified in

Standalone Document No.7, Groundwater Monitoring Plan [A.R. 06080]. The MDL results are for informational purposes and will be discussed in the reports for each sampling event, as described in Standalone Document No.7, Groundwater Monitoring Plan [A.R. 06080].

XI.C.1.e.

Semiannual groundwater monitoring reports shall also include the information listed in Section 7.2 of Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080].

XI.C.1.f.

The Permittee shall enter all monitoring, testing, and quality-assured analytical data obtained pursuant to Permit Condition XI.C. in the operating record as required by Permit Condition I.M. Upon written request by the Department, these results shall be submitted within 30 calendar days after the Permittee's receipt of the request, provided the Permittee has received the analytical laboratory's quality-assured data report.

XI.D. Data Evaluation

XI.D.1.

Groundwater Concentration Limit - For each hazardous constituent detected above the applicable detection monitoring criterion from results of analyses obtained pursuant to Permit Condition XI.C.1., the Permittee shall determine if the groundwater - concentration limit has been exceeded at any compliance monitoring well at the point of compliance using the following procedures:

XI.D.1.a.

Determine if the observed concentration of any constituent listed in Tables XI-2 and XI-3 of the Permit exceeds the groundwater concentration limit listed in Table XI-4 of the Permit for that constituent;

XI.D.1.b.

[Reserved]

XI.D.1.c.

Cumulative Carcinogenic Risk Evaluation - Determine if the carcinogenic health risk associated with those detected hazardous constituents listed in Tables XI-2 and XI-3 of the Permit that are denoted as carcinogens ("C" Risk Category) contribute a cumulative risk greater than 1×10^{-5} . For the purposes of determining compliance with this condition, the Permittee shall compute the ratio of the detected concentration of the hazardous constituent divided by the risk based concentration for the hazardous constituent shown in Table XI-4. The Permittee shall determine if the Risk Index exceeds ten using Equation 1; and

XI.D.1.d.

Cumulative Toxicity Risk Evaluation - Determine if the toxicity associated with those detected hazardous constituents listed in Tables XI-2 and XI-3 of the Permit that are denoted as non-carcinogenic ("Tox" Risk Category) systemic toxicants contribute an aggregate hazard quotient (HQ) greater than one. For the purposes of determining compliance with this condition, the Permittee shall compute the individual constituent hazard index (HI) for those detected hazardous constituents by dividing the detected concentration of the hazardous constituent by the risk-based concentration for the hazardous constituent shown in Table XI-4. The Permittee shall determine if the Risk Index exceeds one using Equation 1.

Equation 1

$$RI = \frac{C_1}{RBC_1} + \frac{C_2}{RBC_2} + \bullet \bullet \bullet + \frac{C_n}{RBC_n}$$

where,

RI = Risk Index

C_n = Concentration of the nth constituent in groundwater (mg/L)

RBC_n = Risk-based concentration for the nth constituent in groundwater (mg/L)

With Department approval, the Permittee may group detected hazardous constituents by similar toxic endpoints and perform the determination in Equation 1 separately for each group of detected hazardous constituents with similar toxic endpoints.

XI.D.2.

[Reserved]

XI.D.3.

[Reserved]

XI.D.4.

Upon a determination of hazardous constituents in any monitoring well exceeding the groundwater concentration limits as specified in Permit Condition XI.D.1., the Permittee shall:

XI.D.4.a.

Notify the Department of this finding in writing, within 7 calendar days after receipt of the analytical laboratory's quality-assured data report [40 CFR 264.99(h)1]; and,

XI.D.4.b.

Within 30 calendar days after this finding, collect two verification samples from any affected monitoring well(s), following the procedures identified in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080], and reanalyze the samples for all constituents that exceeded the limits as specified in Permit Condition XI.D.1. In no case shall the period between the date of the determination under Permit Condition XI.D.4. and the date of the submission to the Department of the analytical results for the sampling under this Permit Condition exceed 135 calendar days unless a written extension is granted by the Department.

XI.D.4.c.

The Permittee may elect to forgo verification sampling activities described under Permit Condition XI.D.4.b. and instead follow the requirements of Permit Condition XI.D.6.

XI.D.5.

If the analytical laboratory's quality-assured data results from the analyses in Permit Condition XI.D.4.b. show that:

XI.D.5.a.

The verification samples do not confirm the detection of hazardous constituents above the limits as specified in Permit Condition XI.D.1., the Permittee shall resume compliance monitoring according to the schedule in Permit Condition XI.C.1., need take no action under Permit

Condition XI.D.6., and shall notify the Department in writing that the compliance monitoring program is being resumed; or

XI.D.5.b.

One or both verification samples confirm the detection of constituents above the limits as specified in Permit Condition XI.D.1, the Permittee shall follow the requirements of Permit Condition XI.D.6.

XI.D.6.

The Permittee shall either:

XI.D.6.a.

Notify the Department in writing within 7 calendar days of determining that the groundwater concentration limit as specified in Permit Condition XI.D.1. has been exceeded at any compliance monitoring well as determined by Permit Condition XI.D.4. or XI.D.5.b., as appropriate. The notification shall indicate which limits have been exceeded. [40 CFR 264.99(h)(1)] The Permittee shall also follow the requirements specified in Permit Condition XI.D.8. or XI.E., as appropriate; or,

XI.D.6.b.

Submit to the Department a report demonstrating that a source other than a regulated unit or past practice unit caused the exceedance, or that the exceedance is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater; and in addition, when required or as provided by 40 CFR 264.99(i), an application for a permit modification to make any appropriate changes to the compliance monitoring program including changes to the groundwater concentration limits for which there was an exceedance. If the Permittee has performed verification sampling under Permit Condition XI.D.4.b., then the report shall be submitted within 90 calendar days after the Permittee's receipt of the analytical laboratory's quality-assured data report under Permit Condition XI.D.5.b. If the Permittee has elected to forgo verification sampling in accordance with Permit Condition XI.D.4.c., the report shall then be submitted within 90 calendar days after the Permittee's receipt of the analytical laboratory's quality-assured data report for the samples collected under Permit Condition XI.C.1.a.

XI.D.7.

If the Department determines that a report submitted in accordance with Permit Condition XI.D.6.b. fails to identify a source of contamination other than a regulated unit or past practice unit, or that the exceedance is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater or that any application for a permit modification to make changes to the groundwater concentration limits for which there was an exceedance has been denied, then the Permittee shall follow the requirements in Permit Condition XI.E. if the groundwater concentration limit(s) as specified in Permit Condition XI.D.1. is exceeded.

XI.E. Corrective Action Process

XI.E.1.

Upon exceedance of the groundwater concentration limit(s), as determined under the process in Permit Conditions XI.D.4. through XI.D.7., the Permittee shall send a written request to the Department's Eastern Region Environmental Cleanup Manager requesting a meeting. The

written request shall be sent within 15 calendar days after the notification date in Permit Condition XI.D.6.a. or the determination of the Department in Permit Condition XI.D.7. The written request shall also contain the following information:

XI.E.1.a.

Description of release with information known to date,

XI.E.1.b.

Description of Permittee's obligation to notify the Environmental Cleanup Manager about the release in accordance with this Permit, and

XI.E.1.c.

Description of Permittee's duty to initiate corrective action in accordance with this Permit if any groundwater concentration limit(s) is exceeded.

XI.E.2.

The Permittee shall meet with the Department's Eastern Region Environmental Cleanup Program within 45 calendar days after the date on the written notification sent in accordance with Permit Condition XI.E.1. unless the Department approves a longer time period. Such a meeting is intended to initiate development of a corrective action written agreement for the Facility.

XI.E.3.

The Permittee shall enter into a written agreement with the Department's Eastern Region Environmental Cleanup Program within 180 calendar days after the date on the written notification sent in accordance with Permit Condition XI.E.1. The agreement shall provide that any corrective action be implemented under OAR 340-122. The agreement shall also provide that in the event of disagreement between the Permittee and Department regarding whether any action under the agreement is consistent with or exceeds 40 CFR 264.90 to 264.101, the Permittee and Department shall make a good faith effort to resolve the dispute by taking the following actions: a) discussing the dispute between the Permittee's Environmental Manager and the Department's Project

Manager, b) if necessary, referring the dispute for resolution to the Permittee's Facility Manager and the Department's Cleanup Manager; and c) if necessary, providing each other their respective positions in writing and referring the dispute for resolution by the Department's Eastern Region Administrator, in consultation with the Permittee's Market Area Manager ‡ **Rev. 3.**

XI.E.4.

The agreement entered into under Permit Condition XI.E.3. shall be processed as a Class 3 Permit modification and shall be considered an enforceable Condition of this Permit.

XI.E.5.

During the course of the corrective action agreement, the Department may determine it necessary to revise the agreement or corrective action activities conducted under the agreement. Changes to the agreement, or corrective action activities conducted under the agreement that are implemented after the effective date of this Permit may require a modification to the Permit. The Permittee shall notify the Manager in writing at least 30 days prior to any planned changes to the agreement or corrective action activities conducted under the agreement. Upon notification by

the Permittee, the Manager will determine whether or not a Permit modification will be needed. If a Permit modification is needed, the Manager shall so notify the Permittee, and upon receipt of such notice, the Permittee shall proceed with a Permit modification in accordance with the procedures set forth in 40 CFR 270.41 and 270.42, incorporated by reference under OAR 340-100-0002 and as modified by OAR -105-0041 and OAR 340-106-0005. In accordance with 40 CFR 270.42(e), as incorporated by reference under OAR 340-100-0002, the Permittee may seek, and the Manager may grant, temporary authorization to implement changes to the agreement or corrective action activities conducted under the agreement prior to the final approval of a Permit Modification.

XI.E.6.

The agreement or corrective action activities conducted under the agreement may be modified at any time under the Department's Environmental Cleanup Program authority pursuant to the agreement, provided the Permittee complies with the requirements of XI.E.5. The Department's Environmental Cleanup Program authority to implement changes to the agreement, or corrective action activities conducted under the agreement, shall not be restricted or hindered by any requirements to modify this Permit. Changes approved under the Department's Environmental Cleanup program authority and implemented by the Permittee shall not be a violation of any condition of this Permit or any requirement to modify this Permit provided the Permittee complies with the requirements of X.E.5.

XI.E.7

The requirement to modify this Permit to accommodate changes in the agreement or corrective action conducted under the agreement shall not be in any way interpreted or deemed to replace, supersede, supplant, modify, or amend the Permittee's right to dispute resolution under the agreement.

XI.E.8.

If, after the conclusion or stabilization of corrective action activities, either the Permittee or the Department determines that the Facility should return to a compliance monitoring program, the Permittee must submit a permit modification request to institute a renewed compliance monitoring program under this Permit.

XI.E.9.

For any specific compliance monitoring program that has demonstrated an exceedance of the groundwater concentration limit(s), as determined under the process in Permit Conditions XI.D.4. through XI.D.7., the Permittee shall continue with that specific groundwater compliance monitoring program as specified in Section XI of this Permit until there is a written agreement for corrective action in effect. Unless the corrective action written agreement provides otherwise, the Permittee shall continue the groundwater compliance monitoring program as set forth in Section XI of this Permit after the corrective action agreement is in place.

XI.F. Post Closure Monitoring

XI.F.1.

All procedures described in Section XI of this Permit shall apply to the post-closure care period, as well as the active life period of each regulated unit or waste management area.

XI.G. Request for Permit Modification

XI.G.1.

If the Permittee determines the compliance monitoring program no longer satisfies the requirements of 40 CFR 264.99, then within 90 calendar days the Permittee shall submit an application for a permit modification to make any appropriate changes to the compliance monitoring program. [40 CFR 264.99(j)]

XI.G.2.

If the Permittee demonstrates that concentrations at all compliance monitoring wells identified in Table XI-1 of the Permit are below the detection monitoring criteria as specified in Permit Condition IX.D.1. for a period of three consecutive years, the Permittee may submit an application for a permit modification to modify the groundwater compliance monitoring program.

TABLE XI-1

Table XI-1 <u>[Reserved]</u> Compliance Monitoring Program Compliance Monitoring Wells					
Point of Compliance	Location		Frequency of Sampling and Analysis		
Well Name	Northing	Easting	Table XI-2 Analysis	Table XI-3 Analysis	Appendix IX Analysis*
Notes:					
See Permit Condition XI.C. for compliance monitoring requirements. Datum is the Oregon State Plane Coordinate System. *Sampling for Appendix IX constituents is required triennially at one compliance well, the well that had the highest total VOC concentration during the most recent sampling event.					

TABLE XI-4

<p align="center">Table XI-4 Compliance Monitoring Program Constituent-Specific Groundwater Concentration Limits [in (mg/l)]</p>				
Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
Acenaphthene	83-32-9	0.0424	Tox	1,825
Acetone	67-64-1	10,000	Tox	27,400
Acetophenone	98-86-2	61	Tox	3,040
Acetonitrile	75-05-8	5,150	Tox	515
Acrolein	107-02-8	2.1	Tox	0.2100
Acrylonitrile	107-13-1	1.915	C, Tox	0.1915
Aldrin	309-00-2	0.0018	C, Tox	0.0167
Allyl Chloride	107-05-1	36	Tox	9,125
Aniline	62-53-3	0.01**	C, Tox	49.8051
Anthracene	120-12-7	0.01**	Tox	9,125
Aramite	140-57-8	0.001	C, Tox	11.3556
Benzene	71-43-2	17.5	C, Tox	25
Benzo[a]anthracene	56-55-3	0.01**	C	0.3889
Benzo[b]fluoranthene	205-99-2	0.01**	C	0.3889
Benzo[k]fluoranthene	207-08-9	0.01**	C	3.8889
Benzo[a]pyrene	50-32-8	0.01**	C	10
Benzyl Alcohol	100-51-6	429	Tox	54,750
Bis(2-Chloroethyl) Ether	111-44-4	0.5006	C	0.0501
Bis(2-Chloro-1-Methylethyl) Ether	108-60-1	0.0129	C	0.0013
Bis(2-ethylhexyl) Phthalate (DEHP)	117-81-7	0.01**	C, Tox	20.2778
Bromodichloromethane	75-27-4	67.4	C, Tox	400
Bromoform	75-25-2	31	C, Tox	400
Bromomethane	75-83-9	152	Tox	43.3500
Butyl Benzyl Phthalate	85-68-7	0.0269	Tox	36,500
Carbon Disulfide	75-15-0	11.9	Tox	5,214.2857

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
Carbon Tetrachloride	56-23-5	7.93	C, Tox	25
Chlordane	57-74-9	0.00056	C, Tox	10
Chloroaniline, p- (4-Chloroaniline)	106-47-8	53	Tox	730
Chlorobenzene	18-90-7	4.72	Tox	500
Chlorobenzilate	510-15-6	0.10	C, Tox	1.0514
Chlorodibromomethane (Dibromochloromethane)	124-48-1	26	C, Tox	400
Chloroethane	75-0-3	57	C, Tox	19.75
Chloroform	67-66-3	79.2	C, Tox	400
Chloromethane	74-87-3	64.5	C, Tox	11.40
Chloronaphthalene, 2- (beta-Chloronaphthalene)	91-58-7	0.12	Tox	2,435
Chlorophenol, 2-	95-57-8	220	Tox	152
Chloroprene (2-Chloro-1,3-Butadiene)	126-99-8	220	Tox	71.5
Chrysene	218-01-9	0.01**	C	38.8890
Cresol, o- (2-Methylphenol)	95-48-7	260	Tox	9,125
Cresol, m- (3-Methylphenol)	108-39-4	180	Tox	9,125
Cresol, p- (4-Methylphenol)	106-44-5	180	Tox	915
DDD	72-54-8	0.0009	C	1.1829
DDE	72-55-9	0.0012	C	0.835
DDT	50-29-3	0.00025	C, Tox	0.835
Diallate	2303-16-4	0.14	C	4.6539
Dibenz[a,h]anthracene	53-70-3	0.01**	C	0.0389
Dibenzofuran	132-64-9	0.031	Tox	61
Dibromo-3-Chloropropane, 1,2- (BCP)	96-12-8	10.0*	C, Tox	1.0

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
Dibromoethane, 1,2- (Ethylene Dibromide, EDB)	106-93-4	2.5	C,Tox	0.25
Dichlorobenzene, 1,2- (o-Dichlorobenzene)	95-50-1	1.56	Tox	3,000
Dichlorobenzene, 1,3- (m-Dichlorobenzene)	541-73-1	1.56	Tox	72.5
Dichlorobenzene, 1,4- (p-Dichlorobenzene)	106-46-7	0.74	C,Tox	375
Dichlorobenzidine, 3,3-	91-94-1	0.05**	C	0.6309
Dichlorodifluoromethane	75-71-8	2.8	Tox	1,970
Dichloroethane, 1,1-	75-34-3	50.6	Tox	3,990
Dichloroethane, 1,2-	107-6-2	85.2	C, Tox	25
Dichloroethene, 1,1-	75-35-4	22.5	Tox	35
Dichloroethene, cis-1,2	156-59-2	35	Tox	350
Dichloroethene, trans-1,2	156-60-5	63	Tox	500
Dichlorophenol, 2,4-	120-83-2	45	Tox	547.5
Dichlorophenoxyacetic Acid, 2,4- (2,4-D)	94-75-7	4	Tox	350
Dichloropropane, 1,2-	78-87-5	28	C, Tox	25
Dichloropropane, cis-1,3-	10061-1-5	18.25	C, Tox	1.825
Dichloropropane, trans- 1,3-	10061-2-6	18.25	C,Tox	1.825
Dieldrin	60-57-1	0.00195	C, Tox	0.0177
Diethyl Phthalate	84-66-2	10.80	Tox	146,000
Dimethoate	60-51-5	238	Tox	36.5
Dimethylbenzidine, 3,3'-	119-93-7	1.2343	C	0.1234
Dimethylphenethylamine, alpha, alpha-	122-09-8	180	Tox	182.5
Dimethylphenol, 2,4-	105-67-9	78.7	Tox	3,650
Dimethyl Phthalate	131-11-3	42.9	Tox	1,825,000

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
Di-n-Butyl Phthalate (Dibutyl Phthalate)	84-74-2	0.112	Tox	18,250
Di-n-Octyl Phthalate	117-84-0	0.01**	Tox	7,300
Dinitrobenzene, 1,3-	99-65-0	4.69	Tox	18.25
Dinitro-o-Cresol, 4,6- (4,6-Dinitro-2-methylphenol)	534-52-1	1.28	Tox	18.25
Dinitrophenol, 2,4-	51-28-5	27.9	Tox	365
Dinitrotoluene, 2,4-	121-14-2	2.70	Tox	365
Dinitrotoluene, 2-6-	606-20-2	1.82	Tox	182.5
Dinoseb	88-85-7	0.52	Tox	35
Dioxane, 1,4-	123-91-1	52*	C	5.2
Diphenylamine	122-39-4	0.53	Tox	4,565
Disulfoton	298-04-4	0.163	Tox	7.3
Endrin	72-20-8	0.0025	Tox	10
Ethylbenzene	100-41-4	1.69	Tox	3,500
Ethyl Methacrylate	97-63-2	0.20	Tox	2,740
Fluoranthene	206-44-0	0.01**	Tox	7,300
Fluorene	86-73-7	0.0198	Tox	1,215
HCH alpha (alpha-BHC)	319-84-6	0.05**	C, Tox	0.0451
HCH beta (beta-HCH)	319-85-7	0.05**	C, Tox	0.1577
HCH gamma (gamma-BHC, Lindane)	58-89-9	0.068	C, Tox	1.0
Heptachlor	76-44-8	0.0018	C, Tox	0.25
Heptachlor Epoxide	1024-57-3	0.002	C, Tox	1.0
Hexachlorobenzene	118-74-1	0.062	C, Tox	5.0
Hexachlorobutadiene	87-68-3	0.0323	C, Tox	55
Hexachlorocyclopentadiene	77-47-4	0.018	Tox	250
Hexachloroethane	67-72-1	0.50	C, Tox	20.2778
Hexachlorophene	70-30-4	1.40	Tox	55

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
Indeno [1,2,3-cd]pyrene	193-39-5	0.01**	C	0.3889
Isobutyl Alcohol (Isobutanol)	78-83-1	850	Tox	9,125
Isophorone	78-59-1	120	C, Tox	289.8304
Kepone	143-50-0	0.3549	C, Tox	0.0355
Methacrylonitrile	126-98-7	52	Tox	5.2
Methoxychlor	72-43-5	0.00045	Tox	200
Methyl Ethyl Ketone (2-Butanone)	78-93-3	2200	Tox	34,840
Methyl Methacrylate	80-62-6	141	Tox	7,100
Methyl Parathion	298-00-0	0.55	Tox	4565
Methyl-2-Pentanone, 4-	108-10-1	190	Tox	9,950
Methylene Bromide (Dibromomethane)	74-95-3	117	Tox	304
Methylene Chloride	75-09-2	130	C, Tox	25
Naphthalene	91-20-3	0.31	Tox	31
Nitroaniline, 2-Methyl-5-(5-Nitro-o-toluidine)	99-55-8	86.0269	C	8.6027
Nitroaniline, 2- (o-Nitroaniline)	88-74-4	12.6	Tox	550
Nitroaniline, 3- (m-Nitroaniline)	99-09-2	8.90	C, Tox	13.5185
Nitroaniline, 4- (p-Nitroaniline)	100-01-6	8.0	C, Tox	13.5185
Nitrobenzene	98-95-3	20.9	Tox	17
Nitrophenol, 4- (p-Nitrophenol)	100-02-7	0.0804	Tox	1,460
N-Nitrosodi-n-butylamine	924-16-3	0.1030	C	0.0103
N-Nitroso di-n-propylamine	621-64-7	0.4056	C	0.0406
N-Nitrosodiethylamine	55-18-5	0.0189	C	0.0019
N-Nitrosodimethylamine	62-75-9	0.0557	C, Tox	0.0056

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
N-Nitrosodiphenylamine	86-30-6	0.351	C, Tox	57.9365
N-Nitroso-N-methylethylamine (N-Nitrosomethylethylamine)	10595-95-6	0.1290	C	0.0129
N-Nitrosopyrrolidine	930-55-2	1.3519	C	0.1352
Parathion	56-38-2	0.103	Tox	1,095
PCB Aroclor 1016	12674-11-2	0.007	C, Tox	2.5
PCB Aroclor 1221	11104-28-2	0.007	C, Tox	2.5
PCB Aroclor 1232	11141-16-5	0.007	C, Tox	2.5
PCB Aroclor 1242	53469-21-9	0.007	C, Tox	2.5
PCB Aroclor 1248	12672-29-6	0.007	C, Tox	2.5
PCB Aroclor 1254	11097-69-1	0.007	C, Tox	2.5
PCB Aroclor 1260	11096-82-5	0.007	C, Tox	2.5
Pentachlorobenzene	608-93-5	2.40	Tox	146
Pentachloronitrobenzene	82-68-8	0.05**	Tox	1.0919
Pentachlorophenol	87-86-5	19.5	C, Tox	5
Phenol	108-95-2	828	Tox	54,750
Phenylenediamine, p- (4-Phenylenediamine)	106-50-3	380	Tox	34,675
Phorate	298-02-2	0.50	Tox	36.5
Pronamide	23950-58-5	0.15	Tox	13,690
Pyrene	129-00-0	0.01**	Tox	915
Pyridine	110-86-1	1,825	Tox	182.5
Silvex; 2-(2,4,5-Trichlorophenoxy) Propionic Acid	93-72-1	1.40	Tox	1,460
Styrene	100-42-5	3.10	Tox	500
T, 2,4,5- (2,4,5-Trichlorophenoxyacetic Acid)	93-76-5	2.20	Tox	1,825

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
TCDD 2,3,7,8- (Dioxin)	1746-01-6	0.000193	C	0.0002
Tetrachlorobenzene, 1,2,4,5-	95-94-3	0.003	Tox	55
Tetrachloroethane, 1,1,1,2-	630-20-6	22.0914	C, Tox	2.2091
Tetrachloroethane, 1,1,2,2-	79-34-5	2.83*	C, Tox	0.283
Tetrachloroethene	127-18-4	2	C, Tox	25
Tetrachlorophenol, 2,3,4,6-	58-90-2	10	Tox	5,475
Tetraethyl Dithiopyrophosphate (Sulfotepp)	3689-24-5	0.25	Tox	91.5
Toluene	108-88-3	5.26	Tox	5,000
Toluidine, o-(2-Methylaniline)	95-53-4	11.8287	C	1.1829
Toxaphene	8001-35-2	0.0074	C	15
Trichlorobenzene, 1,2,4-	120-82-1	3	Tox	350
Trichloroethane, 1,1,1-	71-55-6	13.3	Tox	1,000
Trichloroethane, 1,1,2-	79-0-5	44.2	C, Tox	25
Trichloroethene	79-1-6	11	C, Tox	25
Trichlorofluoromethane	75-69-4	11	Tox	6,441
Trichlorophenol, 2,4,5-	95-95-4	12	Tox	250
Trichlorophenol, 2,4,6-	88-06-2	8	C, Tox	18.25
Trichloropropane, 1,2,3-	96-18-4	0.0818	C, Tox	0.0082
Trinitrobenzene, 1,3,5- (sym-trinitrobenzene)	99-35-4	3.50	Tox	5,475
Vinyl Acetate	108-05-4	200	Tox	2,060
Vinyl Chloride	75-1-4	27.6	C, Tox	10
Xylenes	1330-20-7	1.10	Tox	50,000
Antimony	7440-36-0	300	Tox	30
Arsenic	7440-38-2	500	C, Tox	50

Table XI-4
Compliance Monitoring Program
Constituent-Specific Groundwater Concentration Limits [in (mg/l)]

Hazardous Constituent	CAS ¹ Number	Groundwater Concentration Limit ²	Risk Category ³	Risk-Based Concentration for Cumulative Risk Evaluation ⁴
Barium	7440-39-3	100,000	Tox	10,000
Beryllium	7440-41-7	200	Tox	20
Cadmium	7440-43-9	250	Tox	25
Chromium VI	18540-29-9	5,000	Tox	500
Cobalt	7440-48-4	36,500	Tox	3,650
Copper	7440-50-8	65,000	Tox	6,500
Cyanide (free)	57-12-5	10,000	Tox	1,000
Lead	7439-92-1	750	Tox	75
Mercury	7487-94-7	100	Tox	10
Nickel	7440-02-0	36,500	Tox	3,650
Selenium	7782-49-2	2,500	Tox	250
Silver	7440-22-4	9,125	Tox	913
Thallium	7440-28-0	100	Tox	10
Tin	7440-31-5	1,000,000	Tox	109,500
Vanadium	7440-62-2	1,825	Tox	183
Zinc	7440-66-6	547,500	Tox	54,750

Notes:

¹CAS = Chemical Abstract Services

²These groundwater concentration limits for organic hazardous constituents are based on one percent of the aqueous solubility limit for each hazardous constituent and are used as alternate concentration limits (ACLs) under 40 CFR 264.98. Where one percent of the aqueous solubility limit for a hazardous constituent exceeds the ACL (without the 10 percent safety factor) as determined in *Demonstration Report: Development of Site-wide Alternate Concentration Limits in Groundwater* (CWM and CH2M Hill 2007), the determined ACL is used (shown with an asterisk * in the table). Also, where one percent of the aqueous solubility limit for a hazardous constituent is less than the reporting limit for the hazardous constituent, the reporting limit is used (shown with two asterisks** in the table). The groundwater concentration limits for inorganic hazardous constituents are the ACLs (without the 10 percent safety factor and capped at one million parts per million where necessary).

³ C = Carcinogenic; Tox = Noncarcinogenic (i.e., systemic toxicant)

⁴The risk-based concentrations for the Selah Member are based on the RBC for carcinogenic and non-carcinogenic ACLs, whichever is the lower concentration limit, times the 10 percent safety factor. These values will be used, if compliance monitoring becomes necessary, to assess the cumulative risk posed by detected constituents in groundwater. The values are not artificially capped because doing so would bias the cumulative risk calculation and not allow an accurate evaluation of cumulative risk to be completed.

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XII. CORRECTIVE ACTION

All historic hazardous waste operations at Permittee's Facility have been authorized and regulated by the Department pursuant to permits. Both EPA and the Department have investigated and evaluated the Permittee's Facility for the presence of any unidentified solid waste management unit (SWMU) including from December 1985 through April 1989 and in 2002. Neither EPA nor the Department has identified the presence of a SWMU that has not been regulated by this Permit or previous permit issuance. Permit Conditions in this Section XII are included as a precautionary matter should a new SWMU be identified in the future. ‡ **Rev. 3**

XII.A Standard Conditions

XII.A.1.

ORS 466.105(10) and 40 CFR 264.101 require that hazardous waste Permits address corrective action for releases of hazardous wastes including hazardous constituents from any solid waste management unit (SWMU) at the Facility, regardless of when the waste was placed in the unit.

XII.A.2.

All future plans and schedules required by this section of this Permit, including plans and schedules pursuant to Permit Condition XII.A.5., are upon approval by the Department, incorporated into this Permit by reference. Extensions of the due dates for submittals may be granted by the Manager either in writing or in accordance with 40 CFR 270.41 or 40 CFR 270.42.

XII.A.3.

[Reserved]

XII.A.4.a.

Any release of a hazardous constituent into the environment from any solid waste management units (SWMUs) which is not a Permitted unit or a past practice unit, as defined in Permit Condition IX.A, shall require the Permittee to notify in writing the Department's Eastern Region Hazardous Waste Program Manager within 15 days of discovery.

XII.A.4.b.

The Department shall review the notification and provide an opportunity for the Permittee to comment before deciding if the release should be referred to the Department's Eastern Region Clean-up program. ‡ **Rev. 3**

XII.A.5.

All referred corrective action activity initiated from Permit Condition XII.A. 4. shall be implemented by the Department's Clean-up Program pursuant to an agreement with provisions as set forth in Permit Condition IX.E.3. ‡ **Rev. 3**

XII.B NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-- IDENTIFIED SOLID WASTE MANAGEMENT UNITS

XII.B.1.

The Permittee shall notify the Hazardous Waste Program Manager of any newly-identified SWMU found at the Facility which is not a SWMU previously identified in the administrative record. Such written notification shall be made within 15 days of discovery.

XII.B.2.

After such notification, the Hazardous Waste Manager may request in writing that the Permittee prepare a SWMU Assessment Plan and a proposed schedule of implementation and completion of the Plan for any newly-identified SWMU discovered after the effective date of this Permit. The Permittee shall submit the SWMU Assessment Plan to the Department's Eastern Region Hazardous Waste Manager.

XII.B. 3.

After the Permittee submits the SWMU Assessment Plan, the Eastern Region Hazardous Waste Manager shall either approve or disapprove the Plan in writing. If the Manager approves the Plan, the Permittee shall begin to implement the Plan within 30 calendar days after receiving such written approval. If the Manager disapproves the Plan, the Manager shall notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan. If the Manager approves the revised Plan the Permittee shall implement the Plan after 30 calendar days of receiving written approval. The Manager's approval of a plan shall not be considered a modification of this Permit.

XII.C. Additional Corrective Action Permit Conditions

XII.C.1.

Unless otherwise approved by the Department after consultation with the Permittee, prior to decommissioning any monitoring well or piezometer that is not routinely sampled in the detection or compliance monitoring programs at the Facility, the Permittee shall assess the potential for the monitoring well or piezometer to have acted as a vertical conduit for migration of contamination from the vadose zone to groundwater. This assessment shall consider, at a minimum, the proximity of the monitoring well or piezometer to unlined landfill areas and previously closed Solid Waste Management Units. If the Department reasonably determines based on the above assessment that a potential exists for migration of contamination from the vadose zone to groundwater, the Permittee shall collect a groundwater sample from the monitoring well or piezometer to be decommissioned in accordance with procedures in Standalone Document No. 7, Groundwater Monitoring Plan [A.R. 06080] and analyze the sample for the constituents and parameters listed in Table IX-3 and report the analytical results to the Department.

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XIII. AMENDMENTS TO STANDALONE DOCUMENTS

XIII.A. Amendments to the Waste Analysis Plan [Standalone No. 1] ‡ Rev. 4

**XIII.B. Amendments to the Security Procedures, Hazard Prevention, Training Plan
[Standalone No. 2]**

[Reserved]

XIII.C. Amendments to the Inspection Plan [Standalone No. 3]

XIII.C.1. ‡ Rev. 4

XIII.D. Amendments to the Contingency Plan [Standalone No. 4]

[Reserved]

**XIII.E. Amendments to the Closure/Post-Closure Plan, Cost Estimates, Financial
Assurance, Insurance [Standalone No. 5]**

[Reserved]

XIII.G. Amendments to the Groundwater Monitoring Plan [Standalone No. 7]

[Reserved]

XIII.H. Amendments to the Bulk Liquid Storage/Treatment Plan, [Standalone No. 8]

[Reserved]

**XIII.I. Amendments to the Container Storage Design and Operations Plan [Standalone
No. 9]**

[Reserved]

XIII.J. Amendments to the Stabilization/Chemical Treatment Plan [Standalone No. 10]

[Reserved]

XIII.K. Amendments to the Debris Treatment Plan [Standalone No. 11]

[Reserved]

**XIII.L. Amendments to the Containment Building Design and Operations Plan
[Standalone No. 12]**

XIII.L.1. ‡ Rev. 4

XIII.L.2. ‡ Rev. 4

**XIII.M. Amendments to the Surface Impoundments Design and Operations Plan
[Standalone No. 13]**

[Reserved]

XIII.N. Amendments to the Landfill Design and Operations Plan [Standalone No. 14]

[Reserved]

XIII.O. Amendments to the Landfill Response Action Plans [Standalone No. 15]

[Reserved]

XIII.P. Amendments to the Construction Quality Assurance Plan [Standalone No. 16]

XIII.P.1.

Before any additional landfill L-14 cells are constructed, or and new lined hazardous waste unit is constructed, the Permittee shall submit a project-specific Quality Assurance Plan (QAP), as described in Section 1.1 in Standalone Document No. 16, in accordance with 40 CFR 270.42. No construction may begin until the Department approves the modification.

XIII.P.2.

The Permittee may only use a Geosynthetic Installer, as described in section 1.2.5 of Standalone Document No. 16, that has a minimum experience of installing 10,000,000 ft² of geosynthetic material.

XIII.P.3.

Before the Permittee constructs an engineered soil liner, using soils that are different, or characteristically different, than the soil liners at landfill L-12 or L-13, the Permittee shall submit for Department approval an in-situ permeability test in accordance with 40 CFR 270.42. The Permittee may not begin emplacement of the soil liner until the Department approves in writing the results of the in-situ test.

XIII.P.4.

Regardless of any statement in Standalone Document No. 16, the Permittee shall include in project-specific QAPs (as described in section 1.1 of Standalone Document No. 16) mandatory conformance testing for all geosynthetic materials used in the project.

XIII.P.5.

Section 9.7.4A on page 9-11A of Standalone Document No. 16 Construction Quality Assurance Plan, first paragraph, second sentence, shall read, “Such trial seams shall be made at the beginning of each seaming period, and at least once each five hours, for each production seaming apparatus and for each seaming personnel used that day.”

XIII.P.6.

Section 9.9.2A on page 9-16A of Standalone Document No. 16, Construction Quality Assurance Plan, first bulleted item, shall read, “A minimum frequency of one test location per 500 ft (152 m) of production seam length performed by each welding machine. This frequency is to be determined as an average taken throughout the entire facility.”

XIII.P.7.

Section 13.7 on page 13.7 of Standalone Document No. 16 Construction Quality Assurance Plan, last paragraph, third sentence, shall read, “The hydrated material shall be covered with new dry GCL material, removed and replaced with new dry GCL material.”

XIII.Q. Amendments to the Landfill Final Cover Design Plan [Standalone No. 17]

[Reserved]

XIII.R. Amendments to the Landfill Design Drawings [Standalone No. 18]

[Reserved]

XIII.S. Amendments to the Bioremediation Facility and Organic Recovery Unit Design and Operations Plan [Standalone No. 19]

XIII.S.1‡ Rev. 4

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XIV. PCB DISPOSAL PERMIT

XIV.A. PCB Disposal Permit Facility Establishment

This section of the hazardous waste document is a separate PCB disposal facility permit from the hazardous waste Permit in Sections I through XII. Attached to the Hazardous Waste Permit, this Section XIV is the Permit for PCB storage, treatment and disposal at the Chemical Waste Management of the Northwest, Inc., facility located near Arlington in Gilliam County. This PCB disposal facility permit could have been issued as a separate document, but, for efficiency, it is attached to the hazardous waste permit so that the requirements for storage, treatment and disposal of hazardous waste and storage, treatment and disposal of PCB are in one volume.

This PCB disposal facility Permit is issued in accordance with ORS 466.065 and 466.250 through 466.355, and the rules promulgated at OAR Chapter 340 Division 110 and consistent with the Toxic Substance Control Act and the regulations promulgated at 40 CFR Part 761. This permit issuance terminates permit license HW-1 issued in 1980.

This Permit shall be identified as PCB-1 and is effective as of August 21, 2006, and shall remain in effect until August 21, 2016, unless revoked and reissued, terminated, or continued in accordance with OAR 340-105-0051.

Issued To:

Chemical Waste Management of the Northwest, Inc.

17629 Cedar Springs Lane

Arlington, OR 97812

Issued By:

Lynn Hampton, Chair

Date

Oregon Environmental Quality Commission

Joni Hammond, Regional Administrator

Date

Oregon Department of Environmental Quality



State of Oregon
Department of
Environmental
Quality

XIV.B. Standard Conditions

XIV.B.1. Effect of Permit

The Permittee is authorized to store, to treat and to dispose PCB or PCB items in accordance with the Conditions of this Permit. Any disposal of PCB or PCB items by the Permittee at this Facility that is not authorized by this Permit and for which a Permit is required under Section 6 of TSCA and ORS 466.255 is prohibited. The definitions found in OAR 340-100-0010 and OAR 340-110-0003 are incorporated into this Permit.

XIV.B.2. Personal and Property Rights

This Permit does not convey any property rights of any sort, or any exclusive privilege, nor does this Permit authorize any injury to persons or property or invasion of other private rights, or any infringement of State or local laws or regulations.

XIV.B. 3. Permit Actions

XIV.B.3.a.

This Permit may be modified, revoked and reissued, or terminated for cause by the Department as specified in 40 CFR 270.41, 270.42, 270.43, and OAR 340 Divisions 105 and 106.

XIV.B.3.b.

The filing of a request for a Permit modification, or revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on the part of the Permittee shall not stay the applicability or enforceability of any Permit Condition except as provided in 40 CFR 270.41, 270.42, 270.43, and OAR Divisions 105 and 106.

XIV.B.4. Severability

XIV.B.4.a.

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision, which forms the basis for any condition of this Permit, does not affect the validity of any other state or federal statutory or regulatory basis for said condition.

XIV.B.4.b.

In the event that a Condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the related applicable and relevant conditions found in the previously expired permit until final resolution of the stayed Condition unless compliance with the related applicable and relevant conditions in the previously expired-permit would be technologically incompatible with compliance with other conditions of this Permit, which have not been stayed.

XIV.B.5. Duty to Comply

XIV.B.5.a.

The Permittee shall comply with all Conditions of this Permit, except that the Permittee need not comply with the Conditions of this Permit to the extent and for the duration such noncompliance is authorized in an emergency permit issued by the Department or Environmental Protection Agency. Any Permit noncompliance, except under the terms of an emergency permit, constitutes

a violation of the applicable provision of Oregon State law or rule and is grounds for enforcement action, Permit termination, modification or revocation and reissuance of the Permit, or denial of a Permit renewal application.

XIV.B.5.b.

Compliance with the terms of the Permit does not constitute a defense to any action brought under ORS 459, 465, 466.180, 466.185, 466.190, 466.200, 466.210, 466.225., or Sections 3007, 3008, 3013 and 7003 of RCRA (42 U.S.C. 6934 and 6973), Section 7 of the Toxic Substances Control Act (TSCA), or Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) [42 U.S.C. 9606(a)], as amended by the Superfund Amendments and Reauthorization Act of 1986, or any other federal or state law governing protection of public health or the environment from any imminent and substantial endangerment to human health or the environment.

However, compliance with the terms of this Permit does constitute a defense to any action alleging failure to comply with the applicable law upon which this Permit is based. ‡ **Rev. 3**

XIV.B.6. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee shall apply for and obtain a new Permit, utilizing 40 CFR 270.30(b). The Permittee shall submit such Permit application at least 180 calendar days prior to the expiration date of this Permit, unless the Manager has granted permission for a later date (but no later than the expiration date of the existing Permit) in accordance with 40 CFR 270.10(h).

XIV.B.7. Continuation of Expiring Permit

This Permit, all Conditions herein and Standalone Documents No. 20, PCB Operations Plan, shall continue in force until the effective date of a new Permit if the Permittee has submitted a timely, complete application, and, through no fault of the Permittee, the Commission does not issue a new Permit under 40 CFR 124.15 on or before the expiration date of the previous Permit.

XIV.B.8. Need to Halt or Reduce Activity Not Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the Conditions of this Permit.

XIV.B.9. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

XIV.B.10. Proper Operation and Maintenance

The Permittee shall at all times operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee so as to achieve compliance with the Conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This Condition requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the Conditions of this Permit.

XIV.B.11. Duty to Provide Information

The Permittee shall furnish to the Manager, or his designee, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Manager and Inspector, upon request, copies of records required to be kept by this Permit.

XIV.B.12. Inspection and Entry

The Permittee shall allow the Department, or its authorized representatives, upon the presentation of credentials and other documents as may be required by law, to:

XIV.B.12.a.

Enter at reasonable times upon the Permittee's premises where regulated PCB management units or activities are located or conducted, or where records shall be kept under the Conditions of this Permit;

XIV.B.12.b.

Have access to and copy, at reasonable times, any records that shall be kept under the Conditions of this Permit;

XIV.B.12.c.

Inspect at reasonable times any portion of the Facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

XIV.B.12.d.

Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by TSCA or Oregon Law, any substances or parameters at any PCB Disposal Facility location.

XIV.B.13. Monitoring and Records

The Permittee will monitor and record PCB disposal activities in accordance with 40 CFR 761.75(b)(8)(iv) and 40 CFR 761.180(b), (d) and (f) and Standalone Document No. 20, PCB Operations Plan [A.R. 06093].

XIV.B.14. Reporting Planned Changes

The Permittee shall give notice to the Manager, as soon as possible of any planned physical alterations or additions to the permitted PCB Disposal Facility.

XIV.B.15. Anticipated Noncompliance

The Permittee shall give advance notice to the Manager of any planned changes in the permitted PCB Disposal Facility or activity that might result in noncompliance with Permit requirements.

XIV.B.16. Transfer of Permit

This Permit is personal to the Permittee and is transferable only in accordance with OAR 340-110-0075.

XIV.B.17. Twenty-four Hour Reporting

XIV.B.17.a.

The Permittee shall verbally report to the Manager or Inspector, any PCB noncompliance with this Permit which may endanger health or the environment, within 24 hours from the time the Permittee becomes aware of the noncompliance. The report shall include:

XIV.B.17.b.

Information concerning release of any PCB waste that might cause an endangerment to public drinking water supplies; and,

XIV.B.17.c.

Any information of a release or discharge of PCB waste or of a fire or explosion from the PCB Disposal Facility that might threaten human health or the environment. The description of the occurrence shall include the information requirements in Permit Condition I.T.2.

XIV.B.18. Other Noncompliance

The Permittee shall report to the Manager all other instances of PCB noncompliance with this Permit not otherwise reported at the time monitoring reports are submitted.

XIV.B.19. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant PCB facts in the Permit application, or submitted incorrect information in the Permit application or in any report to the Manager or Inspector, the Permittee shall promptly submit such facts or corrected information to the appropriate persons.

XIV.B.20. Signature and Certification

All written applications, reports required by this Permit and other information requested by the Manager, when submitted to the Manager, or Inspector, by the Permittee shall be signed and certified as required by 40 CFR Part 761 in accordance with 40 CFR 761.3.

XIV.B.21 Confidential Information

Information submitted by the Permittee to the Manager or Inspector that is claimed as trade secret, confidential, or confidential business information by the Permittee will be handled in accordance with the applicable provisions of OAR 340-100-0003.

XIV.B.22. Fees

The Permittee shall pay fees as required under ORS 466.325, 466.345, 466.350 and as promulgated at OAR 340-105, and other state statutes and related rules. This Condition does not preclude the Permittee from challenging any future promulgation or adoption of a statute, rule, or administrative action imposing any fee on the Permittee.

XIV.C. Storage, Treatment, And Disposal Standards

XIV.C.1.

This Permit hereby incorporates into this PCB Permit by reference Standalone Document No. 20 PCB Operation Plan [A.R. 06093].

XIV.C.2.

All notifications and correspondence sent to the Environmental Protection Agency, in accordance with the PCB Operation Plan, shall also be sent to the Department of Environmental Quality Eastern Region Hazardous Waste Manager.

XIV.D. Requirement for Groundwater Monitoring or Waiver

The Permittee shall not place PCB or PCB items into landfill L-14 until there is an in-place groundwater monitoring system unless a waiver has been issued by the Department in accordance with 40 CFR 761.75(c)(4).

XIV.E. Additional Disposal Requirements

XIV.E.1.

The Permittee may dispose of PCB or PCB items only in Landfills L-12, L-13, and L-14.

XIV.E.2.

In the event of a PCB spill, the Permittee shall comply with Standalone Document No. 4, Contingency Plan [A.R. 06077].

XIV.E.3.

The Permittee shall comply with OAR 340-110-0061(6) regarding waste oils containing PCB.

XIV.E.4.

If the Permittee uses containers described in 40 CFR 761.65(c)(7)(i), the Permittee shall have and implement a Spill Prevention Control and Countermeasure plan in accordance with OAR 340-110-0065(2).

XIV.F. Groundwater Monitoring

XIV.F.1.

Groundwater monitoring requirements found in Section X of the Hazardous Waste Permit are incorporated and made part of this PCB Permit.

XIV.F.2.

The Permittee shall perform the groundwater tasks and procedures as set forth in Section X of the Hazardous Waste Permit in a manner consistent with 40 CFR 761.75(b)(6).

XIV.F.3.

The Permittee shall sample and analyze for PCBs, pH, and specific conductance in the groundwater in accordance with Section X of the Hazardous Waste Permit in a manner consistent with 40 CFR 761.75(b).

XIV.G. ORS 466.065 Conditions

XIV.G.1.

The Permittee shall not accept for treatment or disposal during the ten-year term of this Permit an amount of PCB more than 110 percent of the PCB treated or disposed by the Facility under any permit without approval of the Department in accordance with ORS 466.065.

XIV.G.2.

The Permittee shall comply with all applicable federal and Oregon technological requirements for treating and disposing of PCB.

XIV.G.3.

The Permittee shall comply with all applicable Oregon and federal requirements for financial and technical capability to properly construct and operate the PCB disposal Facility [ORS 466.065(4).]

XIV.G.4.

The Permittee shall own, or contract with, an emergency response provider or coordinator that can provide for timely response to a PCB spill or release in Oregon of PCB being transported to the Facility by a motor vehicle owned by the Permittee [ORS 466.065(5).]

XIV.G.5.

The Permittee shall require that any transporter of PCB hired by the Permittee, owns, or has a contract with, an emergency response provider or coordinator that can provide for timely response to a spill or release in Oregon of PCB being transported by a motor vehicle to the Facility [ORS 466.065(6).]

XIV.G.6.

Upon arrival at the facility of any motor vehicle transporting PCB not described in Permit Conditions XIV.G.5. and XIV.G.4., the Permittee shall request to review the transporter's authorization to transport PCB in Oregon and the driver's authorization to drive a motor vehicle transporting PCB in Oregon. The Permittee shall report to the Department the name of any transporter or driver failing to demonstrate the requested authorization [ORS 466.065(7).]

XIV.H. Equivalent Materials/Information

If certain equipment, materials, procedures, and administrative information (such as names, phone numbers, addresses, obsolete forms, addition of new forms and to forms, deletion from forms of units certified as closed, etc.) are specified in this Permit, the Permittee is allowed to use an equivalent or superior substitute or deletion. Use of such equivalent or superior substitute or deletion shall not be considered a modification of the Permit, but the Permittee shall present the proposed change to the Department, and then with Department approval that the item is equivalent or superior (such approval may be verbal or written) submit to the Department by written letter the revision, accompanied by a narrative explanation, and the date the revision becomes effective which may be the date of the submittal or a later date. The Department may judge the soundness of the revision as to whether the item is equivalent or superior. If the Department determines that the change is not in accordance with the approval, the Department will by letter direct the Permittee to submit the change again. The format of tables or forms is not subject to the requirements of this Permit and may be revised at the Permittee's discretion.

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USEI Grand View Permit

Permittee: U.S. Ecology Idaho Inc.

Facility Identification/Permit Number: IDD073114654

INTRODUCTION AND SIGNATURE PAGE

Pursuant to the Idaho Hazardous Waste Management Act of 1983 (HWMA), as amended, Idaho Code 39-4401 et seq., and the *Rules and Standards for Hazardous Waste*, as amended, IDAPA 58.01.05.000 et seq., a Hazardous Waste Treatment, Storage, and Disposal Permit is hereby issued to U.S. Ecology Idaho Inc. (USEI or Permittee) for operation of USEI's Site B facility, located in Owyhee county near Grand View, Idaho, on Lemley Road, at latitude 43° 03' 056" North and longitude 116° 15' 044" West.

The Permittee shall comply with all terms and conditions of this Permit, including Attachments 1 through 26. The Permittee must comply with all applicable state and federal regulations, including IDAPA 58.01.05.004 through 58.01.05.008 and 58.01.05.010 through 58.01.05.013 [40 Code of Federal Regulations (CFR), Parts 260 through 266, 268, 270, and 124] and as specified in this Permit. Any reference in this Permit to the Resource Conservation and Recovery Act (RCRA) or the Hazardous and Solid Waste Amendments of 1984 (HSWA), or federal regulations promulgated thereunder in 40 CFR, shall be deemed to include the equivalent HWMA statute or state regulation promulgated thereunder.

Applicable state and federal regulations are those that are in effect on the date of final administrative action on this Permit and any self implementing statutory provisions and related regulations that, according to the requirements of HWMA and/or HSWA, as amended, are automatically applicable to the Permittee's hazardous waste management activities, notwithstanding the conditions of this Permit.

This Permit is based upon the Administrative Record, as required by IDAPA 58.01.05.013 [40 CFR § 124.9]. The Permittee's failure, in the application or during the permit issuance process, to disclose fully all relevant facts, or the Permittee's misrepresentation of any relevant facts, at any time, shall be grounds for the termination or modification of this Permit and/or initiation of an enforcement action. To the extent there are inconsistencies between the Permit and the attachments, the language of the Permit shall prevail. The Permittee must inform the Director of the Idaho Department of Environmental Quality (Director) of any deviation from the permit conditions, or changes in the information on which the application is based that would affect the Permittee's ability to comply, or actual compliance with the applicable regulations or permit conditions, or which alters any permit condition in any way.

The Director shall enforce all conditions of this Permit. Any challenges of any permit condition shall be appealed to the Idaho Board of Environmental Quality, in accordance with IDAPA 58.01.05.013 [40 CFR § 124.19], and in accordance with the Idaho Department of Environmental Quality "Rules Governing Declaratory Rulings and Contested Case Proceedings." IDAPA 58.01.23.043.

The United States Environmental Protection Agency (EPA) shall maintain an oversight role of the state-authorized program, and in such capacity, shall enforce any permit condition based on state requirements if, in the Agency's judgement, the Director should fail to enforce that permit condition. Any challenges to the Agency-enforced conditions shall be appealed to the Agency, in accordance with 40 CFR § 124.19.

This Permit is effective as of July 28, 2016 and shall remain in effect until July 28, 2026, unless, in accordance with IDAPA 58.01.05.012, the Permit is: revoked and reissued [40 CFR § 270.41], terminated [40 CFR § 270.43], modified [40 CFR § 270.42 Appendix I.A.6], or continued [40 CFR § 270.51].

July 28 , 2016
Date

John H. Tippetts, Director
Department of Environmental Quality

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LIST OF ATTACHMENTS

The following documents are excerpts from the Permittee's RCRA Permit Application dated May 1, 2014 or revised documents dated August 28, 2015, with the sections and pages specified. The Permit Application and applicable attachments from the previous RCRA Permit are part of the official Administrative Record for the facility. The documents listed below are hereby incorporated, in their entirety, by reference into this Permit. The Department has modified specific language in the attachments, as deemed necessary. These modifications are described in the permit conditions (Modules I through XIII) and, thereby, supersede the language of the original attachment. All references in these attachments to the Agency or to designated representatives of the Agency shall also refer to the Department or to designated representatives of the Department. All references in any of the attachments of this Permit to "Envirosafe Services of Idaho Inc. (ESII)" are superseded by reference to "U.S. Ecology Idaho (USEI)." These incorporated attachments are enforceable conditions of this Permit, as modified by the specific permit conditions.

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| Attachment 1 | Facility Legal Description and Map of Facility Location, consisting of: Section B, Pages 1 through 8, Table B-1, Figure B-1, Location of USEI Site B Facility, of Permit Application as last revised November 01, 2019, Appendix B.1, Corporate Warranty Deed of Correction, Pages B.1-1 through B.1-7, of Permit Application, dated May 1, 2014, Drawing PRMI-T03, Typical Facility Site Plan, Rev. B, and Drawing PRMI-T01, General Facility Topographic Plan Sheet 1, Revision B, of Permit Application, as last revised April 25, 2017. |
| Attachment 2 | Waste Analysis Plan, consisting of: Section C, Pages 1 through 59, including Figures C-1 through C-11, of Permit Application, as last revised November 01, 2019, Appendix C.1, and Appendix C.2, of Permit Application, dated November 01, 2019. |
| Attachment 3 | Security Procedures, consisting of: Subsections F.0 and F.1, Pages 1 through 3, of Permit Application, dated November 01, 2019, and Drawing PRMI-T10, Revision C of Permit Application, as last revised May 31, 2019. |
| Attachment 4 | Inspection Plan, consisting of: Subsections F.2 and F.3, Pages 1 through 12, including Table F-1 and Figures F-1 through F-24, of Permit Application, as last revised November 01, 2019. |
| Attachment 5 | Training Plan, consisting of: Section H, Pages 1 through 10, including Tables H-1 through H-4 of Permit Application, as last revised November 01, 2019. |
| Attachment 6 | Hazards Prevention Plan, consisting of: Subsections F.4 and F.5, Pages 1 through 8, of Permit Application, as last revised November 01, 2019. |

- Attachment 7 Contingency Plan, consisting of:
Section G, Pages 1 through 27, including Tables G-1 through G-8 and
Figures G-1 through G-7, of Permit Application, as last revised April 2,
2020.
- Attachment 8 Response Action Plan, consisting of:
Section M, Pages 1 through 26 including Tables M-1 through M-9, as last
revised November 18, 2017.
- Attachment 9 Closure and Post-Closure Plans, consisting of:
Section I, Pages 1 through 48, including Tables I-1 through I-8 and
Figures I-3 through I-6, as last revised July 02, 2019; and
Drawing PRMI-T13, Facility Typical Topographic Plan Final at Closure,
Revision F, of Permit Application, as last revised August 28, 2015.
- Attachment 9a Final Cover Design for Cells 14 and 15, consisting of:
Appendix I.15, of Permit Application dated May 1, 2014, including:
Appendix A – Drawings
Appendix B – CQA Plan
Appendix C -- Specifications
Appendix D -- Calculations
- Attachment 9b Final Cover Design for Cell 16, consisting of:
Appendix I.16, of Permit Application dated May 1, 2014, including:
Appendix A – Drawings
Appendix B – CQA Plan
Appendix C – Calculations
- Attachment 10 Surface Water Management Plan, consisting of:
Section N, Pages 1 through 15, including Tables N-1 through N-8, as last
revised November 28, 2017.
Drawing PRMI-D01 Surface Drainage Plan – Existing Conditions, Revised
July 22, 2016,
Drawing PRMI-D02 Surface Drainage Plan – Interim Conditions, Revised
July 22, 2016, and
Drawing PRMI-D03 Surface Drainage Plan – Final at Closure, last revised
May 13, 2016.
- Attachment 11 Ground Water Monitoring Plan, consisting of:
Section E, Pages 1 through 95, including Tables E-1 through E-24,
Figures E-3 through E-36, Plate E-10 of Permit Application, as last revised
April 02, 2018,
Appendix E.6, 2010 Re-evaluation of Rising Ground Water, and
Appendix E.14, Alternative Concentration Limit Demonstration Report, of
Permit Application, dated May 1, 2014.
- Attachment 12 RCRA Part A Permit Application, consisting of:
Section A, Pages 1 through 4, Figures A-1 through A-4, of Permit
Application, as last revised November 18, 2017,
Appendix A-1, RCRA Part A Permit Application, as last revised November
01, 2019 and
Appendix A-2 and A-3, Part A Continuation Forms, as last revised

November 01, 2019.

- Attachment 13 Container Management Units - Design and Operations, consisting of: Sections D.0 and D.1, Table of Contents and Pages -1 through -13, including Tables D-1 and D-1A and Figure D-1, of Permit Application, as last revised November 01, 2019, Drawing PRMI-R11 Typical General Arrangement Container Storage Areas, Revision B, Drawing PRMI-C16 Container Storage Pad No. 7 Grading Plan, Revision B, of Permit Application dated May 1, 2014, Drawing PRMI-C17 Container Storage Pad No. 7 Sections and Details, Revision B, of Permit Application dated May 1, 2014, Drawing PRMI-R21 General Arrangement RCRA/PCB Storage Bldg-Plans, Revision D, dated October 6, 2016, and Drawing PRMI-R22 General Arrangement RCRA/PCB Storage Bldg-Sections, Revision C, of Permit Application dated May 1, 2014. See Attachment 20 for additional Container Management Unit drawings.
- Attachment 14 Bulk Material Tank Systems - Design and Operations, consisting of: Subsection D.2, Pages 1 through 9, including Table D-2, and Figures D-3 through D-7, and Appendix D.2.5, RCRA Tank Systems, of Permit Application, as last revised November 01, 2019. See Attachment 20 for additional Tank System drawings.
- Attachment 15 Outdoor Stabilization Facility - Design and Operation, consisting of: Figures D-2 and D-2a of Permit Application, as last revised August 28, 2015, and Drawing PRMI-R31, Revision B, of Permit Application dated May 1, 2014.
- Attachment 16 Reserved for future use.
- Attachment 17 Surface Impoundment Units - Design and Operation, consisting of: Subsection D.4, Pages 1 through 18, including Figures D-8 and D-9, of Permit Application, as last revised November 18, 2017, and Appendix D.4.11, Evaporation Pond Reconstruction Engineering Report, dated June 10, 2016. See Attachment 20 for additional Surface Impoundment drawings.
- Attachment 18 Landfill Engineering Report Cell 16 Subcells 16-1 & 16-2, consisting of: Appendix D.5.1 -- Cell 16 Engineering Report, Appendix D.5.2 -- Report Figures 1-3, Appendix D.5.3 -- Section 19 Siting License, Appendix D.5.4 -- Cell 16 Subcells 16-1 and 16-2 Drawing Set, Appendix D.5.5 -- Specifications, Appendix D.5.6 -- CQA Plan, Appendix D.5.7 -- Stability Analysis, Appendix D.5.8 -- Ketterling Clay Investigations, and Appendix D.5.9 -- Geotechnical Engineering Report, of Permit Application, dated May 1, 2014. Appendix D.5.10 -- Landfill Engineering Report Addendum Cell 16, of

Permit Application, last revised July 6, 2017.

- Attachment 19 Landfill Units - Design and Operation, consisting of:
Subsections D-6 and D-11, Pages 1 through 27, including Table D-3,
Appendices D.8.1, D.8.2, and Figures D-8 through D-11, as last revised
November 18, 2017.
See Attachment 20 for additional drawings for Trench 10 and 11, Cell 5,
and Cell 14.
- Attachment 20 Master Book of Drawings, Overall Facility, consisting of:
Master Book of Drawings, as last revised November 01, 2019.
- Attachment 21 Reserved for future use.
- Attachment 22 Past Practice Units, consisting of:
Section J, Pages 1 through 25, including Tables J-1 through J-8, and
Drawing PRMI-T05a, Revision B, of Permit Application as last revised
November 01, 2019.
- Attachment 23 Exempt Radiological Materials Procedures Manual, consisting of:
Section P, Exempt Radiological Materials Procedures Manual, and the
following subsections:
Safety Assessment,
RESRAD Models,
ERMP-01, Material Receipt Procedures,
ERMP-02, Exempt Materials Procedures for Decontamination and
Release of Empty Containers,
ERMP-03, Environmental Monitoring Procedures,
ERMP-04, Landfill Operations,
ERMP-05, Waste Acceptance Criteria Evaluation,
ERMP-06, Selection, Care and Use of Portable Instrumentation, and
Drawing PRMI-T04 Windrose (Environmental Radiological Monitoring
Locations), of Permit Application as last revised May 06, 2019.
- Attachment 24 Indoor Stabilization Building and Debris Treatment, consisting of:
Section D.9, Pages 1 through 5, of Permit Application as last revised
November 01, 2019.
See Attachment 20 for Additional Drawings for Containment Building.

Attachment 25 Treatment Processes Description, consisting of:
Subsection D.10, pages 1 through 21, including Table D-4, of Permit Application, as last revised November 01, 2019, including the following subsections:

- D.10.a Stabilization
- D.10.b Microencapsulation
- D.10.c Macroencapsulation
- D.10.d Chemical Oxidation
- D.10.e Chemical Reduction
- D.10.f Deactivation
- D.10.g Neutralization
- D.10.h Precipitation
- D.10.i Adsorption
- D.10.j Bioremediation
- D.10.k Evaporation
- D.10.l Size Reduction
- D.10.m Decanting

Attachment 26 List of Permit Modifications.

DEFINITIONS

All definitions contained in IDAPA 58.01.05.004, .008 and .010 through .013 [40 CFR Parts 260, 264, 266, 268, 270, and 124] are hereby incorporated, in their entirety, by reference into this Permit, except that any of the definitions used below shall supersede any definition of the same term given in IDAPA 58.01.05.000 et seq. Where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference of the generally accepted scientific or industrial meaning of the term.

- a "Application" shall mean the May 2014 HWMA/RCRA Permit Renewal Application containing Sections A through P.
- b "Cell" shall mean the Landfill Units 5, 14, 15 and 16. This includes, and supersedes, references to "Trench 5 or Trench 14."
- c "Containment Building" shall mean the building consisting of the "debris portion" and the "stabilization portion" where hazardous waste management activities shall be conducted, for wastes which USEI is permitted to manage, including the handling and treatment/ stabilization of "fine wastes."
- d "Day," "Daily," "Normal Working Day," and "Business Day" shall mean any calendar working day(s) (excluding weekends and holidays) where waste management activities occur at the facility, unless otherwise specified. Any requirement of submittal, under the terms of this Permit, that would be due on a Saturday, Sunday, or a federal or state holiday shall be due on the following business day.
- e "Department" shall mean the Idaho Department of Environmental Quality.
- f "Director" shall mean the Director of the Idaho Department of Environmental Quality or his or her designee.
- g "Facility or Site" shall mean (1) All contiguous land, structures, other appurtenances, and improvements on the land used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of these), (2) For the purpose of implementing corrective action under IDAPA 58.01.05.008 §264.101, all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. This definition also applies to facilities implementing corrective action under RCRA Section 3008(h). This facility description is as set forth in Attachment 1 of this Permit.
- h "Fine Wastes" shall mean any waste containing fine particulate matter as determined by Exhibit A of the December 9, 1996 Consent Order (included as Figure C-11 of Attachment 2 of this Permit).
- i "HWMA" shall mean the state of Idaho, Hazardous Waste Management Act of 1983, as amended, Idaho Code § 39-4401 et seq.
- j "Hazardous Waste Constituent" means a constituent that could cause or has caused the EPA to list a waste as hazardous per 40 CFR Part 261, Subpart D, or any constituent listed in Appendix VIII of IDAPA 58.01.05.005 [40 CFR Part 261] or in Appendix IX of IDAPA 58.01.05.008 [40 CFR Part 264].
- k "Hazardous Waste" shall mean a hazardous waste as defined in IDAPA 58.01.05.005 [40 CFR § 261.3].
- l "Hazardous Waste Management Unit (HWMU)" shall mean those operable units subject to the requirements of IDAPA 58.01.05.012 [40 CFR §§ 270.14 to 270.25].
- m "IDAPA" shall mean the Idaho Administrative Procedures Act, Chapter 52, Title 67, Idaho Code.
- n "Load," in reference to temporary storage of interim piles, shall mean one treatment load or batch equal to the capacity of a Containment Building mixing bin tank (not to exceed 100 cubic yards).

- o "MCL(s)" shall mean Maximum Contaminant Levels promulgated under the Safe Drinking Water Act.
- p "Owner" shall mean U.S. Ecology Idaho Inc.
- q "Permit" shall mean this Permit issued by the Idaho Department of Environmental Quality.
- r "Permittee" shall mean U.S. Ecology Idaho, Inc.
- s "Post-Cover Care" shall mean the care requirements for specifically referenced waste units that were closed and covered in the 1980's, prior to their being subject to specific RCRA closure requirements.
- s "Radioactive contaminated liquids" shall mean those radioactive liquids that exhibit a dose rate which exceeds 40 µR/hr.
- t "Release" shall mean any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous waste constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous waste constituents).
- u "Schedule of Compliance" shall mean a schedule of remedial and/or closure measures included in a permit, including an enforceable sequence of interim requirements (i.e., actions, operations, or milestone events) leading to compliance with the HWMA and regulations.
- v "Solid Waste Management Unit (SWMU)" shall mean any discernable unit at which solid wastes have been placed at any time, despite whether the unit was intended for the management of solid or hazardous wastes. Such units include any area at a facility at which solid wastes have been routinely and systematically released.
- w "Stabilization Facility" shall mean the outdoor area at which USEI is permitted to perform hazardous waste treatment activities
- x "SW 846" shall mean "Test Methods for Evaluating Solid Waste Chemical/Physical Methods" (latest edition published by EPA).
- y "Trench" shall mean shallow Land Disposal Units such as Landfill Units 10 and 11.
- z "UHC" shall mean Underlying Hazardous Constituent. UHC means any constituent listed in IDAPA 58.01.05.011 [40 CFR § 268.48], Table UTS – Universal Treatment Standards, except fluoride, selenium, sulfides, vanadium, and zinc, which can reasonably be expected to be present at the point of generation of the hazardous waste at a concentration above the constituent – specific UTS Treatment Standard.

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ACRONYMS AND ABBREVIATIONS

For the purpose of this Permit the following acronyms and abbreviations shall apply:

AASHTO	American Association of State Highway and Transportation Officials
ABS	Acrylonitrile Butadiene Styrene
ACI	American Concrete Institute
ACGIH	American Conference of Governmental Industrial Hygienists
ACL	Alternate Concentration Limit
AGA	American Gas Association
AGST	Above Ground Storage Tank
ALARA	As Low As Reasonable Achievable
ALR	Action Leakage Rate
ANSI	American National Standards Institute
APC	Air Pollution Control
APP	Aquifer Protection Permit
API	American Petroleum Institute
ASA	American Standards Association
ASME	American Society of Mechanical Engineers
AST	Aboveground Storage Tanks
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAT	Best Available Technology
BMP	Best Management Practice
BOD	Biochemical or Biological Oxygen Demand
C	Celsius/Centigrade
CAO	Corrective Action Order
CAA	Clean Air Act, 42 USC Section 7401 et seq. (Federal)
CAMP	Corrective Action Monitoring Program
CAMU	Corrective Action Management Unit
CEG	Certified Engineering Geologist
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESQG	Conditionally Exempt Small Quantity Generators
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CGL	Comprehensive General Liability Insurance
CHP	Certified Health Professional
CIH	Certified Industrial Hygienist
cm	centimeter; 1/100 meter
CMP	Compliance Monitoring Program
CMU	Container Management Unit
CNCI	Cyanogen Chloride
CO	Carbon Monoxide
CSA	Container Storage Area
CQA	Construction Quality Assurance
CQAP	Construction Quality Assurance Plan
CSP	Certified Safety Professional
DMP	Detection Monitoring Program
DOE	Department of Energy (Federal)
DOI	Department of the Interior (Federal)

DOT	Department of Transportation
DRE	Destruction/Removal Efficiency
EC	Emergency Coordinator
EIR	Exposure Information Report
EMS	Emergency Medical Service
EMT	Emergency Medical Technician
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
EPR	Ethylene Propylene Rubber
EP TOX	Extraction Procedure Toxicity Test (RCRA)
EQL	Estimated Quantitation Limit
ESA	Endangered Species Act, 15 USC Section 1531 et seq.
ESG	English Standard Gauge
ESH	Environmental Health and Safety
ESII	Envirosafe Services of Idaho, Inc.
ESP	Electrostatic Precipitators
F	Fahrenheit
ft	feet / foot
FDA	Food and Drug Administration (U.S.A.)
FEMA	Federal Emergency Management Agency
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act, 7 USC
FOIA	Freedom of Information Act
FR	Federal Register
FUSRAP	Formerly Utilized Sites Remedial Action Plan
GC	Gas Chromatographic
GCL	Geosynthetic Clay Liner
GC/MS	Gas Chromatography/Mass Spectrometry
GPM	Gallons Per Minute
GPS	Ground Water Protection Standards.
GW	Ground Water
HAPs	Hazardous Air Pollutants
HCFCs	Hydrochlorofluorocarbons
HCS	Hazard Communication Standard (OSHA)
HDPE	High Density Polyethylene
HHW	Household Hazardous Waste
HMTA	Hazardous Materials Transportation Act
HOC	Halogenated Organic Compounds
HSWA	Hazardous and Solid Waste Amendment of 1984
HWMA	Hazardous Waste Management Act of 1983, Idaho Code § 39-4401 et seq.
HWMU	Hazardous Waste Management Unit
ICF	Internal Control Form
IDAPA	Idaho Administrative Procedures Act
IDEQ	Idaho Department of Environmental Quality
IECC	Idaho Emergency Communication Center
IMS	Ion Mobility Spectrometry
in	Inch
Inc.	Incorporated
IPDC	Idaho Poison and Drug Center
IR	Infrared
kg	Kilogram; 1,000 grams
km	Kilometer; 1,000 meters
lb	Pound

LD50	Lethal Dose Level 50%
LCR	Leachate Collection and Removal System
LDCR	Leachate Detection, Collection and Removal System
LDR	Land Disposal Restriction
LEL	Lower Explosive Limit
MACT	Maximum Available Control Technology
MCL	Maximum Contaminant Levels (SDWA)
MCLGs	Maximum Contaminant Level Goals (SDWA)
MDL	Minimum Detection Limit
mg/l	milligrams per liter
µrem	Microrem
mil	1/1000 inch
mm	Millimeter; 1/1000 meter
MOU	Memorandum of Understanding
MS	Mass Spectrometry
MSDS	Material Safety Data Sheets
NARM	Nuclear Accelerator Radioactive Material
NCP	National Contingency Plan
NCSA	National Crushed Stone Association
NEC	National Electric Code
NEMA	National Electrical Manufacturers Association
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety & Health
NORM	Naturally Occurring Radioactive Material
NOV	Notice of Violation
NOX	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRC	Nuclear Regulatory Commission
OSHA	Occupational Safety and Health Administration
OSWER	Office of Solid Waste and Emergency Response (US EPA)
O&M	Operation and Maintenance
oz	Ounce
PAH	Polynuclear Aromatic Hydrocarbons
PCB	Polychlorinated Biphenol
PCDF	Polychlorinated Dibenzofurans
PCE	Perchloroethylene
pCi	Picocuries
PE	Professional Engineer
PEL	Permissible Exposure Limits (OSHA)
PM10	Particulate Matter less than 10 microns in diameter
POTW	Publicly-Owned Treatment Works
ppb	Parts per billion
PPE	Personal Protective Equipment
ppm	Parts per million
ppmw	Parts per million by weight
QA/QC	Quality Assurance/ Quality Control
RCRA	Resource Conservation and Recovery Act of 1976
RG	Registered Geologist
RGN	Reactivity Group Numbers
RTK	Right-to-Know
SARA Title III	Emergency Preparedness and Community Right to Know
SCBA	Self-Contained Breathing Apparatus

SDWA	Safe Drinking Water Act
SOP	Standard Operating Procedures
STEL	Short Term Exposure Limit
SWMP	Stormwater Management Plan
SWMU	Solid Waste Management Unit
TCLP	Toxicity Characteristics Leaching Procedure
TLV	Threshold Limit Value
TCE	Trichloroethylene
TOC	Total Organic Carbon
TSCA	Toxic Substance Control Act
TSDF	Treatment Storage and Disposal Facility
UBC	Uniform Building Code
UFC	Uniform Fire Code
µg/l	Micrograms per liter
UHC	Underlying Hazardous Constituent
UL	Underwriter's Laboratories, Inc
USEI	US Ecology Idaho, Inc.
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UV	Ultraviolet Light
VO	Volatile Organics
VOC	Volatile Organic Compound
WAP	Waste Analysis Plan
WLR	Warning Leakage Rate
WPF	Waste Profile Form
WSID	Waste Stream Identification Number
yd	Yard
yd ²	Square yard
yd ³	Cubic yard

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MODULE I - STANDARD PERMIT CONDITIONS

I.A. EFFECT OF PERMIT

- I.A.1. The Permittee is authorized to store, treat, and dispose of hazardous waste in accordance with the conditions of this Permit. Any storage, treatment, or disposal of hazardous waste by the Permittee, at this facility, that is not authorized by this Permit or by IDAPA 58.01.05.006 [40 CFR 262.34], and for which a permit is required under Idaho Code § 39-4409 or Section § 3005 of RCRA, is prohibited.
- I.A.2. Pursuant to IDAPA 58.01.05.012 [40 CFR 270.4], compliance with this Permit generally constitutes compliance, for purposes of enforcement, with the Idaho Hazardous Waste Management Act (HWMA), as amended, except for the requirements not included in this Permit, which become effective by future statute or regulatory changes, to include those requirements promulgated under IDAPA 58.01.05.011 [40 CFR Part 268] restricting the placement of hazardous waste in or on the land.

I.B. PERSONAL AND PROPERTY RIGHTS

This Permit does not convey any property rights of any sort, or any exclusive privilege; nor does this Permit authorize any injury to persons or property, or any invasion of other private rights, or any infringement of state or local laws.

I.C. ENFORCEABILITY

- I.C.1. The terms and conditions of this Permit are enforceable pursuant to the HWMA or any other applicable federal, state, or local law. Violations of this Permit may result in civil penalties, in accordance with HWMA [Idaho Code § 39-4414] and the HWMA Civil Penalty Policy.
- I.C.2. Any person who knowingly makes any false statement or representation in any application, label, manifest, record, report, permit, or other document filed, maintained, or used for the purposes of complying with the provisions of Idaho Code § 39-4415, shall be guilty of a misdemeanor and subject to a fine of not more than ten thousand dollars (\$10,000) or to imprisonment not to exceed one (1) year, or to both, for each separate violation or for each day of a continuing violation.

I.D. OTHER AUTHORITY

The Department expressly reserves any right of entry provided by law, and any authority to order or perform emergency or other response activities as authorized by law.

I.E. PERMIT ACTIONS

- I.E.1. This Permit may be modified, revoked, and reissued or terminated for cause, as specified in IDAPA 58.01.05.012 [40 CFR 270.41, 270.42, and 270.43].
- I.E.2. The filing of a request for a permit modification, or revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on the part of the Permittee shall not stay the applicability or enforceability of any permit condition.

I.E.3. Except as provided by specific language in this Permit or except for the Director's approval of a Class 1 or 2 Permit Modification, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42 (a) and (b)], any modification that substantially alters the facility or its operation, as covered by this Permit, shall be administered as a Class 3 Permit Modification prior to such change taking place, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42(c)].

I.E.4. The Director may modify this Permit when the standards or regulations on which the Permit was based have been changed by statute, the standards or regulations have been amended, or the standards or regulations have changed by way of judicial decision after the effective date of this Permit.

I.E.5. Within forty-five (45) calendar days of a permit modification being put into effect or approved, the Permittee shall provide clean copies of the relevant portions of the Permit and revised Attachments (if not already reflected/provided in the change pages submitted with the Permit Modification Request), reprint the documents (as necessary), and submit to the Director. The Permittee shall submit an electronic version (in a format pre-approved by the Director) of all permit modifications and Permit Applications to the Director.

I.E.6. The Permittee shall ensure that Attachment 26, the permit modification tracking log, is up to date, consistent with Permit Condition I.E.5.

I.F. SEVERABILITY

I.F.1. The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision that forms the basis for any condition of this Permit does not affect the validity of any other state or federal statutory or regulatory basis for said condition.

I.F.2. In the event that a condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the related applicable and relevant standards of the previous Permit until final resolution of the stayed condition, unless compliance with the related applicable and relevant standards would be technologically incompatible with compliance with other conditions of this Permit that have not been stayed.

I.G. DUTY TO COMPLY

I.G.1. The Permittee shall comply with all conditions of this Permit, except that the Permittee need not comply with the conditions of this Permit to the extent and for the duration such noncompliance is authorized in an emergency permit (issued under IDAPA 58.01.05.012 [40 CFR 270.61]). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA, amended by HSWA, and/or of HWMA, and is grounds for enforcement action, permit termination, modification, or revocation and reissuance of the Permit and/or denial of a Permit Renewal Application.

I.G.2. Compliance with the terms of this Permit does not constitute a defense to any action brought under Sections §§ 3007, 3008, 3013, and 7003 of RCRA [42 U.S.C. §§ 6927, 6928, 6934, and 6973], 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) [42 U.S.C. § 9604, 9606(a), or 9607], as amended by the Superfund Amendments and Reauthorization Act of 1986, or any other federal or state law governing protection of public health or the environment from any imminent and substantial endangerment to human health or the environment. However, compliance with the terms of this Permit does constitute a defense to any action alleging failure to comply with the applicable standards upon which this Permit is based.

I.H. DUTY TO REAPPLY

The Permittee must apply for a new permit, in accordance with IDAPA 58.01.05.012 [40 CFR 270.30(b)], at least 180 calendar days prior to the expiration date of this Permit, in accordance with IDAPA 58.01.05.012 [40 CFR 270.10(h)].

I.I. PERMIT EXPIRATION

I.I.1. Except as renewed, modified, revoked, reissued, or terminated by the Director, this Permit shall automatically expire ten (10) years from the effective date of this Permit.

I.I.2. In accordance with IDAPA 58.01.05.012 [40 CFR 270.50(d)], this Permit shall be reviewed five (5) years after the effective date and modified, as necessary, in accordance with IDAPA 58.01.05.012 [40 CFR 270.41].

I.J. CONTINUATION OF EXPIRING PERMIT

This Permit and all conditions herein shall continue in force until the effective date of a new permit, if the Permittee has submitted a timely complete application in accordance with IDAPA 58.01.05.012 [40 CFR 270.10, 270.13 through 270.29], and through no fault of the Permittee, the Director has neither issued nor denied a new permit under IDAPA 58.01.05.013 [40 CFR 124.15] on or before the expiration date of this Permit.

I.K. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

I.L. DUTY TO MITIGATE

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment resulting from the noncompliance and shall carry out such measures, as are reasonable, to prevent significant adverse impacts on human health or the environment.

I.M. PROPER OPERATION AND MAINTENANCE

The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Permittee so as to achieve compliance with the conditions of this Permit. Proper

operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems, only when necessary, to achieve compliance with the conditions of this Permit.

I.N. DUTY TO PROVIDE INFORMATION

The Permittee shall furnish to the Director, within a reasonable time period established by the Director, any relevant information that the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Director, within five (5) days of the Director's request, copies of records required to be kept by this Permit.

I.O. INSPECTION AND ENTRY

Pursuant to IDAPA 58.01.05.012 [40 CFR 270.30(i)], the Permittee shall allow the Director (or an authorized representative) upon the presentation of credentials and other documents, as may be required by law, to:

- I.O.1. Enter (at reasonable times) upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Permit;
- I.O.2. Have access to and copy (at reasonable times) any records that must be kept under the conditions of this Permit;
- I.O.3. Inspect at reasonable times, any portion of the facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- I.O.4. Sample or monitor (at reasonable times), for the purposes of assuring permit compliance or as otherwise authorized by RCRA or state law, any substances or parameters at any location.

I.P. MONITORING AND RECORDS

- I.P.1. The Permittee shall retain records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this Permit, the certification required by IDAPA 58.01.05.008 [40 CFR 264.73(b)(9)], and records of all data, used to complete the application for this Permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or recording unless a longer retention period is required by other conditions of this Permit. The three-year period may be extended by the Director (upon request), in writing, to the Permittee.
- I.P.2. The Permittee shall retain (at the facility) all monitoring records from all surface water sampling, seep sampling, soil sampling, sediment sampling, and ground water monitoring wells and associated ground water surface elevations for the active life of the facility, and for disposal units for the active life of the facility and the Post-Closure

Care Period. The retention periods may be extended by request of the Director, at any time, by written notification to the Permittee, and the retention times are automatically extended, during the course of any unresolved enforcement action regarding this facility, to three (3) years beyond the conclusion of the enforcement action.

- I.P.3. Pursuant to IDAPA 58.01.05.012 [40 CFR 270.30(j)(3)], records of monitoring information shall specify:
 - I.P.3.a. The date(s), exact place, and times of sampling or measurements;
 - I.P.3.b. The name(s), title(s), and affiliation of the individual(s) who performed the sampling or measurements;
 - I.P.3.c. The date(s) analyses were performed;
 - I.P.3.d. The name(s), title(s), and affiliation of the individual(s) who performed the analyses;
 - I.P.3.e. The analytical techniques or methods used; and
 - I.P.3.f. The results of such analyses, including Quality Assurance/Quality Control data.
- I.P.4. Samples and measurements taken for monitoring purposes shall be representative of the monitored activity. The method used to obtain a representative sample of the waste, to be analyzed, shall be the appropriate method from IDAPA 58.01.05.005 [40 CFR Part 261, Appendix I], EPA's most recent edition of *Technical Enforcement Guidance Document* (hereinafter referred to as TEGD), or an equivalent method approved by the Director. Laboratory methods shall be those specified in the most recent edition of *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846* (herein referred to as SW-846), the most recent edition of *Standard Methods for the Examination of Wastewater*, or other alternate method approved in this Permit, or an equivalent method in accordance with Permit Condition I.P.5.
- I.P.5. The Permittee may substitute analytical methods that are equivalent to those specifically approved for use in this Permit, in accordance with the following:
 - I.P.5.a. The Permittee submits to the Director a request for substitution of an analytical method(s) that is equivalent to the method(s) specifically approved for use in this Permit. The request shall provide information demonstrating that the proposed method(s) is equal or superior to the analytical method(s) requested to be substituted in terms of sensitivity, accuracy, and precision (i.e., reproducibility).
 - I.P.5.b. The Director notifies the Permittee (in writing, by certified mail, or hand delivery) that the substitution of the analytical method(s) is approved. Such approval shall not require a permit modification under IDAPA 58.01.05.012 [40 CFR 270.42].
- I.P.6. Results of all ground water analyses required by this Permit shall be submitted to the Director within thirty (30) calendar days of the Permittee's receipt of sample data from the laboratory, but in no case shall the period between the date of sampling and the date of submission of analytical results, to the Director, exceed one hundred twenty (120) calendar days.

I.Q. REPORTING PLANNED CHANGES

The Permittee shall give notice to the Director, as soon as possible, of any planned physical alterations or additions to the facility before such planned physical alterations or additions occur, in accordance with IDAPA 58.01.05.012 [40 CFR 270.30(l)(1)].

I.R. CERTIFICATION OF CONSTRUCTION OR MODIFICATION

I.R.1. The Permittee may not commence storage, treatment, or disposal in a new Hazardous Waste Management Unit or in a modified portion of an existing Hazardous Waste Management Unit, except as provided in IDAPA 58.01.05.012 [40 CFR 270.42], until the Permittee has submitted a letter to the Director (by certified mail, express mail, hand delivery, or electronic submittal) along with the attachments required under Permit Condition II.A.2, signed by the Permittee and a registered professional engineer, certifying that the permitted unit(s) have been constructed or modified in accordance with the approved plans and specifications in compliance with this Permit (IDAPA 58.01.05.012 [40 CFR 270.30(l)]); and

I.R.2. The Director has reviewed and inspected the modified or newly constructed Hazardous Waste Management Unit(s) and has notified the Permittee in writing that he finds the unit(s) to be in compliance with the conditions of this Permit; or

I.R.3. In accordance with IDAPA 58.01.05.012 [40 CFR 270.30(l)(2)(ii)(B)], if within fifteen (15) calendar days of the date of submittal, required by I.R.1 of this Permit, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste.

I.S. REPORTING ANTICIPATED NONCOMPLIANCE

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity that may result in noncompliance with requirements of this Permit, in accordance with IDAPA 58.01.05.012 [40 CFR 270.30(l)(2)]. Advance notice shall not constitute a defense for any noncompliance.

I.T. TRANSFER OF PERMIT

This Permit is not transferable to any person, except after notice to and acceptance by the Director. The Director may require modification or revocation and reissuance of the Permit, pursuant to IDAPA 58.01.05.012 [40 CFR 270.40]. Before transferring ownership or operation of the facility during its operating life, or of a disposal facility during the Post-Closure Period, the Permittee must notify the new owner or operator (in writing) of the requirements of IDAPA 58.01.05.008, 58.01.05.012 [40 CFR Parts 264 and 270] and this Permit.

I.U. TWENTY-FOUR HOUR REPORTING

I.U.1. In accordance with IDAPA 58.01.05.012 [40 CFR 270.30(l)(6)], the Permittee shall verbally report to the Director (or the Idaho Emergency Communication Center during off-hours) any noncompliance with this Permit that might endanger human health or the environment. Any such information shall be reported, as soon as possible, but

not later than twenty-four (24) hours from the time the Permittee becomes aware of the noncompliance. Potential endangerment to human health and the environment may include, but not be limited to, information concerning:

- I.U.1.a. A release of any hazardous waste that may endanger public drinking water supplies; or
- I.U.1.b. A release or discharge of hazardous waste, or of a fire or explosion, at the facility that could threaten human health or the environment outside the facility; or
- I.U.1.c. Noncompliance with Permit Condition II.A.1 of this Permit.
- I.U.2. The verbal description of the occurrence and its cause, if available, shall include the following (at a minimum):
 - Name, title, and telephone number of the individual reporting;
 - Name, address, and telephone number of the owner or operator;
 - Name, address, and telephone number of the facility;
 - Date, time, and type of incident;
 - Location and cause of the accident;
 - Name and quantity of material(s) involved;
 - The extent and description of injuries, if any;
 - An assessment of actual or potential hazards to the environment and human health, where this is applicable;
 - Description of any emergency action taken to minimize possible threat(s) to human health or the environment;
 - Estimated quantity and disposition of recovered material that resulted from the incident; and
 - Any other information necessary to fully evaluate the situation and to develop an appropriate course of action.
- I.U.3. Within five (5) calendar days after the Permittee is required to provide verbal notification, as specified in Permit Condition I.U.1 and I.U.2 of this Permit, the Permittee shall provide (to the Director) a written submission that shall include, but not be limited to, the following:
 - Name, address, and telephone number of the individual reporting;
 - A description (including cause, location, extent of injuries, if any, and an assessment of actual or potential hazard(s) to the environment and human health outside the facility, where this is applicable) of the incident (noncompliance and/or release);
 - The period(s) in which the incident (noncompliance and/or release) occurred including exact dates and times;
 - Whether the results of the incident remain a threat to human health and the environment (whether the noncompliance has been corrected and/or the release has been adequately remediated); and
 - If not, the anticipated time it is expected to continue; the steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance; and/or steps taken or planned to adequately remediate the release.
- I.U.3.a. The Permittee need not comply with the five (5) calendar day, written notice requirement if the Director waives (in writing) the requirement, and the Permittee submits a written report within fifteen (15) calendar days from the time the

Permittee is required to provide verbal notification, as specified in Permit Condition I.U.1 of this Permit.

I.V. OTHER NONCOMPLIANCE

The Permittee shall report to the Director (on a quarterly basis) all other instances of noncompliance, not reported under Permit Condition I.U of this Permit, from the effective date of the Permit. The reports shall contain the applicable information listed in Permit Condition I.U of this Permit. Reporting shall not constitute a defense for any noncompliance.

I.W. OTHER INFORMATION

Whenever the Permittee becomes aware that he/she failed to submit any relevant facts in the Permit Application or submitted incorrect information in a Permit Application, or in any report to the Director, the Permittee shall promptly submit such facts or information to the Director, in accordance with Permit Condition I.Z of this Permit.

I.X. SIGNATURE AND CERTIFICATION

All applications, reports, or other information submitted to the Director (by the Permittee) shall be signed and certified in accordance with IDAPA 58.01.05.012 [40 CFR 270.11 and 270.30(k)].

I.Y. CONFIDENTIAL INFORMATION

The Permittee may be able to make a confidentiality claim regarding information submitted to the Department. Any such claim shall be governed by Sections 39-4411 and 39-337 to 39-350 of the Idaho Code, Sections 58.01.05.004 [40 CFR 260.2], 58.01.05.012 [40 CFR 270.12] and 58.01.05.997, and any other applicable state or local law. Pursuant to those authorities, if no claim of confidentiality is made at the time of submission, the Department may make the information available to the public without further notice.

I.Z. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DIRECTOR

The Permittee shall submit the specified number of copies of each report, notification, or other submission, which are required by this Permit and IDAPA 58.01.05.012 [40 CFR 270.5], to the Director by certified mail, express mail, electronic submittal, or hand delivered at:

Please submit one (1) hard copy and an electronic copy to:

Director
c/o Hazardous Waste Bureau Chief
Idaho Department of Environmental Quality

1410 North Hilton Street
Boise, ID 83706-1255
Telephone No.: (208) 373-0502

Please submit one (1) electronic copy to:

Regional Administrator
c/o State of Idaho Coordinator
Office of Air, Waste and Toxics, RCRA Program
Unit
U.S. Environmental Protection Agency – Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

24-Hour Telephone No.: 1-800-632-8000

The addresses and telephone numbers listed above are current as of the effective date of this Permit and may be subject to change.

I.AA. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

I.AA.1. The Permittee shall maintain at the facility (until closure is completed and certified by an independent, registered professional engineer) the following documents and amendments, and revisions or modifications to these documents:

- I.AA.1.a.** A complete copy of this Permit, including all attachments, figures, tables, and modifications (at a minimum) including the following:
- Waste Analysis Plan, as required by IDAPA 58.01.05.008 [40 CFR 264.13] and this Permit (Attachment 2).
 - Inspection Procedures, Schedules, Logs, and Records, as required by IDAPA 58.01.05.008 [40 CFR 264.15(b)(2) and 264.73(b)(5)] and this Permit.
 - Personnel training requirements for each position and personnel training records for each individual, involved with the management of hazardous waste, as required by IDAPA 58.01.05.008 [40 CFR 264.16(d)] and this Permit.
 - Contingency Plan, as required by IDAPA 58.01.05.008 [40 CFR 264.53(a)] and this Permit (Attachment 7).
 - Operating Record, as required by IDAPA 58.01.05.008 [40 CFR 264.73] and this Permit.
 - Closure Plan and Closure Cost Estimate, as required by IDAPA 58.01.05.008 [40 CFR 264.112(a) and 264.142] and this Permit.

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MODULE II - GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

- II.A.1. The Permittee shall design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, ground water, or surface water that could threaten human health or the environment.
- II.A.2. The Permittee shall construct all future and maintain all existing Hazardous Waste Management Units in accordance with the approved designs, specifications, and maintenance schedules, except for minor changes deemed necessary by the Permittee to facilitate proper construction of the Hazardous Waste Management Units. Minor deviations from the approved designs or specifications necessary to accommodate proper construction, and the substitution of the use of equivalent or superior materials or equipment, must be noted on the as-built drawings and the rationale for those deviations must be provided in narrative form. After completion of construction of each future Hazardous Waste Management Unit, the Permittee shall submit to the Director final as-built drawings and the narrative report as part of the construction certification document specified in Permit Condition I.R.1.
- II.A.3. A 100-foot wide strip of land, located within the outside perimeter (i.e., the fenceline) of the facility's legal boundaries as defined in Attachment 1 of this Permit, shall be set aside as a buffer strip for any hazardous waste treatment, storage, or disposal, as required by IDAPA 58.01.06.013.f. New hazardous waste treatment, storage, or disposal units shall not be constructed within the buffer strip (except as relating to inspection requirements) nor shall the buffer strip be subdivided for the hazardous waste disposal site.
- II.A.3.a. The company-owned land surrounding the Facility to the west, east, and south is subject to the Hazardous Waste Facility Siting Act (Idaho Code §§ 39-5801 through 5820).
- II.A.3.b. The company-owned land along the northern boundary of the Facility, as defined in Permit Condition II.A.3.b.(1), shall remain undeveloped land and no application under the Hazardous Waste Facility Siting Act (Idaho Code §§ 39-5801 through 5820) shall be made to utilize this land for any activities permitted by the Act. This land shall be set aside as a buffer zone where no new hazardous waste treatment, storage, or disposal units, or ancillary structures, shall be constructed (except as relating to inspection requirements and other permit-required activities, such as corrective action) nor shall the buffer zone be subdivided for use as a hazardous waste disposal site. Except as specified above, the buffer zone, as defined in Permit Condition II.A.3.b.(1), will be maintained in a natural state and will not be developed or used in a manner that will impair the historic viewshed or cultural and natural resources. This Permit Condition shall bind USEI, its successors, and assigns.
- II.A.3.b.(1) The buffer zone subject to the requirements of Permit Condition II.A.3.b shall encompass approximately 309 acres and is located as follows:
- T4S, R2E, Owyhee County
Section 13: E1/2 SE1/4

T4S, R2E, Owyhee County
Section 18: Lots 3 and 4, E1/2 SW1/4, S1/2 SE1/4

II.A.4. The Permittee shall comply with all applicable requirements of the Land Disposal Restrictions of IDAPA 58.01.05.011 [40 CFR Part 268].

II.B. REQUIRED NOTICES FOR RECEIPT OF OFF-SITE HAZARDOUS WASTE

II.B.1. The Permittee may receive hazardous waste from a foreign source provided that the Permittee notify the Regional Administrator and the Director (in writing) at least four (4) weeks in advance of the date hazardous waste, from a foreign source, is expected to arrive at the facility, as required by IDAPA 58.01.05.008 [40 CFR 264.12(a)]. Notice of subsequent shipments of the same waste from the same foreign source is not required.

II.B.2. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), it must inform the generator in writing that it has the appropriate permits for and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the Operating Record, in accordance with IDAPA 58.01.05.008 [40 CFR 264.12(b) and 264.73(b)(7)] and this Permit.

II.B.3. The Permittee shall notify the Department in writing, within three (3) business days of the occurrence, that the Permittee has rejected for acceptance a hazardous waste shipment. This notice shall contain the following information:

II.B.3.a. Generator name, EPA ID Number, address, and telephone number;

II.B.3.b. Transporter name and EPA ID Number;

II.B.3.c. Waste description and quantity;

II.B.3.d. Reason for rejection;

II.B.3.e. Date of generator signature;

II.B.3.f. Date of receipt and rejection; and

II.B.3.g. Copy of manifest.

II.C. GENERAL WASTE ANALYSIS

II.C.1. The Permittee shall comply with the procedures and requirements of the Waste Analysis Plan, in accordance with IDAPA 58.01.05.008 and 58.01.05.011 [40 CFR 264.13 and 268.7], and Attachments 2 and 23 of this Permit.

II.C.2. For every waste stream received, the Permittee shall have on file (at the site), the generator-provided "Waste Profile Form" (Figure C-1 of Attachment 2).

II.C.3. The Permittee may revise Figure C-1, as designated in Permit Conditions II.C.3.a and II.C.3.b, without first obtaining a permit modification under IDAPA 58.01.05.012 [40

CFR 270.42]. The procedures designated under Permit Condition II.S shall be followed to implement these revisions:

- II.C.3.a. The Permittee may add information requirements to Figure C-1 in cases where such additional information will result in a more comprehensive Figure C-1.
- II.C.3.b. The Permittee may delete information from Figure C-1 if the information is not essential for determining the acceptability of a waste stream for management at the Permittee's site (i.e., revisions made to Figure C-1 to comply with IDAPA 58.01.05.011 [40 CFR Part 268] restrictions).
- II.C.4. The Permittee shall ensure that the wastes are not managed at the facility in violation of the provisions of the Land Disposal Restrictions rule as contained in IDAPA 58.01.05.011 [40 CFR Part 268] with the exception of CAMU-eligible wastes, per section II.C.5 of this permit. To the extent that modifications to the Permittee's Waste Analysis Plan are needed to comply with future self-implementing provisions of IDAPA 58.01.05.011 [40 CFR Part 268], the Permittee must submit a Permit Modification Request to the Director within ninety (90) calendar days of the effective date of the self-implementing provisions.
 - II.C.4.a. The Permittee is authorized to accept CAMU-eligible wastes for disposal. The Permittee shall ensure CAMU-eligible wastes are managed in accordance with the provisions contained in IDAPA 58.01.05.008 [40 CFR Part 264] and Attachment 2 of this Permit.
- II.C.5. All waste analysis procedures designated in Attachment 2 and 17 of this Permit shall be adhered to for the placement of on-site-generated landfill leachate and any other wastes into the evaporation pond.
- II.C.6. The Permittee shall maintain a copy of the latest approved Waste Analysis Plan, included as Attachment 2 of this Permit, at the facility until the facility is fully closed and certified per IDAPA 58.01.05.008 [40 CFR 264 Subpart G].
- II.C.7. The Permittee shall comply with the requirements of IDAPA 58.01.05.008 [40 CFR 264.17(a)] and follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Attachment 2 of this Permit.
- II.C.8. The Permittee shall comply with the 40 CFR 264 Subpart CC waste determination procedures, as required by IDAPA 58.01.05.008 [40 CFR 264.1083].

II.D. SECURITY PROCEDURES

The Permittee shall comply with the security provisions of IDAPA 58.01.05.008 [40 CFR 264.14(b)] and as described in Attachment 3 of this Permit.

II.E. INSPECTION PLAN

The Permittee shall follow the procedures of the approved Inspection Plan included as Attachment 4 of this Permit. The Permittee shall comply with the inspection provisions of IDAPA 58.01.05.008 [40 CFR 264.15], and as follows:

- II.E.1. The Permittee shall maintain the inspection records and results, in accordance with Permit Condition I.AA. The Permittee shall record inspections on the Inspection Log sheet (included in Attachment 4 of this Permit) or an equivalent, approved log sheet, as specified in IDAPA 58.01.05.008 [40 CFR 264.15(d)].
- II.E.2. The Permittee shall record on the Inspection Logs and Inspection Log Sheets (required by Permit Condition II.E.1) as specified in IDAPA 58.01.05.008 [40 CFR 264.15(d)]. At a minimum, the following shall be recorded:
- The date and time of the inspection;
 - The name of the inspector;
 - A notation of the observations made; and
 - The date and nature of any repairs or other remedial actions.
- II.E.3. The Permittee shall remedy, as required by IDAPA 58.01.05.008 [40 CFR 264.15(c)], on a schedule approved by the Director, any deterioration or malfunction discovered by an inspection.
- II.E.4. The Permittee shall retain the Inspection Logs and Inspection Log Sheets required by Permit Condition II.E.1 until closure is completed and certified, in accordance with IDAPA 58.01.05.008 [40 CFR 264.73(b)(5)] and Permit Condition I.AA.
- II.E.5. In the event of a facility shutdown or an extended holiday, no more than seventy-two (72) hours shall elapse between inspections listed at a frequency of “normal working day” on the inspection schedule (Table F-1 in Attachment 4).
- II.E.6. The Permittee may make only the following revisions to the Inspection Plan, without first obtaining a permit modification, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42]. The procedures designated under Permit Condition II.S shall be followed to implement these revisions.
- II.E.6.a. Upon certification of closure of an individual Waste Management Unit, any portion of the Inspection Plan, specific to that unit, may be deleted from the Inspection Plan (Attachment 4 of this Permit).
- II.E.6.b. The Permittee may modify orientations of inspection-related items on inspection figures.
- II.E.6.c. The Permittee may add inspection requirements to an existing inspection form, table, figure, or disposal record form in cases where such additional requirements will result in a more comprehensive or detailed Inspection Plan.
- II.E.6.d. The Permittee may create additional inspection forms, tables, figures, or disposal record forms to address inspection requirements for equivalent replacement equipment that must be routinely inspected.

II.F. TRAINING PLAN

- II.F.1. The Permittee shall ensure that all personnel who handle hazardous waste are trained in hazardous waste management, safety and emergency procedures (as applicable to their job description) in accordance with the Permittee’s Training Plan. These personnel shall be trained in accordance with the Training Plan, as included in Attachment 5 of this Permit, and documentation of training shall be maintained, as

specified in Attachment 5 of this Permit.

II.G. PREPAREDNESS AND PREVENTION

- II.G.1. The Permittee shall comply with the preparedness and prevention procedures included as Attachment 6 of this Permit, and in accordance with IDAPA 58.01.05.008 [40 CFR 264 Subpart C] and as follows:
- II.G.2. The Permittee shall operate the permitted units so as to minimize the possibility of a fire, explosion or sudden or non-sudden releases to the air or soil, which could threaten human health or the environment, in accordance with IDAPA 58.01.05.008 [40 CFR 264.31] and Attachment 6 of this Permit.
- II.G.3. The Permittee shall maintain the communications and alarm systems, in accordance with IDAPA 58.01.05.008 [40 CFR 264.34] and Attachment 6 of this Permit.
- II.G.4. The Permittee shall maintain the aisle space necessary to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment, in accordance with IDAPA 58.01.05.008 [40 CFR 264.35] and Attachment 6 of this Permit.
- II.G.5. The Permittee shall maintain arrangements with state and local authorities, in accordance with IDAPA 58.01.05.008 [40 CFR 264.37] and Attachment 7 of this Permit. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee for a given HWMU, the Permittee must document this refusal in the Operating Record.

II.H. CONTINGENCY PLAN

- II.H.1. The Permittee shall follow the procedures outlined in the Contingency Plan, included as Attachment 7 of this Permit, and comply with IDAPA 50.01.05.008 [40 CFR 264 Subpart D] and as follows:
- II.H.2. The Permittee shall notify the Department by calling the Idaho Emergency Communication Center's 24-hour phone number (1-800-632-8000), as soon as practical, but in no event more than 24 hours after the discovery of any release of hazardous or radioactive waste that may pose an immediate threat to the Permittee's personnel or the environment, or that requires the Permittee to take corrective action to mitigate the effects of the release, including implementing the Contingency Plan. Releases requiring such notification shall include, but are not limited to, incidents such as personnel exposure or contamination for which outside medical attention is sought; storm events that result in run-off leaving the active areas of the site; or any fire or explosion at the site that requires use of emergency equipment to extinguish or control the fire.
- II.H.3. The Permittee shall review and immediately amend, as necessary, the Contingency Plan whenever:
 - II.H.3.a. This Permit is revised;
 - II.H.3.b. The Contingency Plan fails in an emergency;

- II.H.3.c. The Permittee changes the facility design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- II.H.3.d. The list of emergency coordinators changes; or
- II.H.3.e. Major changes to the list of emergency equipment occur.
- II.H.4. The Permittee shall submit to the Director the names, addresses, and phone numbers of all persons qualified to act as emergency coordinators. The Permittee shall ensure that a trained emergency coordinator be available at all times in case of an emergency.
- II.H.5. The Permittee shall submit a copy of the Contingency Plan, and all revisions to the plan, to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, in accordance with IDAPA 58.01.05.008 [40 CFR 264.53(b)].
- II.H.6. The Permittee shall document the time, date, and details of any incident that requires implementing the Contingency Plan in the Facility Operating Record. The Permittee shall submit a written report of the incident to the Director according to Permit Condition I.U.3.

II.I. MANIFEST SYSTEM

- II.I.1. The Permittee shall follow the procedures for using the Manifest System and identifying and resolving manifest discrepancies, in accordance with IDAPA 58.01.05.008, 58.01.05.012 [40 CFR 264.71, 264.72, and 270.30(i)(7)] and the Waste Analysis Plan, included as Attachment 2 of this Permit.
- II.I.2. The Permittee shall submit an unmanifested waste report to the Director, in accordance with IDAPA 58.01.05.008, IDAPA 58.01.05.012 [40 CFR 264.76 and 270.30(i)(8)], within fifteen (15) calendar days of receipt of unmanifested waste. Unmanifested waste shall be:
- Any RCRA regulated hazardous waste that is not accompanied by a hazardous waste manifest;
 - Any manifested waste that does not contain the generator name on the manifest;
 - Any manifested waste for which the EPA identification number is either incorrect or missing;
 - Any manifested waste for which the designated facility on the manifest is not USEI;
 - Any manifested waste for which the generator's name, signature, or date are missing; and
 - Any manifested waste for which the quantity of material shipped is completely missing.

II.J. RECORD KEEPING AND REPORTING

In addition to the record keeping and reporting requirements specified elsewhere in this

Permit, the Permittee shall comply with the following:

- II.J.1. The Permittee shall maintain a written Operating Record at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.73(a)], for all records identified in IDAPA 58.01.05.008 [40 CFR 264.73(b)(1) through 264.73(b)(16)].
- II.J.2. The Permittee shall, by March 1st of each year, submit to the Director a certification pursuant to IDAPA 58.01.05.008 [40 CFR 264.73(b)(9)], that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated, to the degree determined to be economically practicable; and that the proposed method of treatment, storage, or disposal is the most practicable method currently available to the Permittee, which minimizes the present and future threat to human health and the environment.
- II.J.3. The Permittee shall, by March 1st of each even-numbered year, submit to the Director a Biennial Report covering the facility activities during the previous calendar year, pursuant to IDAPA 58.01.05.008, 58.01.05.006, 58.01.05.012 [40 CFR 264.75(a) through (j), 262.41, 270.30(l)(9)].
- II.J.4. The Permittee shall retain all hazardous waste management records, including data collected in accordance with procedures of the Response Action Plans, and make such records available to the Director (at reasonable times) for inspection, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74(a)].
- II.J.5. The retention period for all records required by this Permit is extended automatically during the course of any unresolved enforcement action regarding the Permittee or as directed by the Director, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74(b)].
- II.J.6. The Permittee shall submit a survey plat of waste disposal locations to the local land authority and to the Director in accordance with the closure requirements of Permit Condition II.K.8 and IDAPA 58.01.05.008 [40 CFR 264.116].
- II.J.7. The Permittee shall submit additional reports to the Director in accordance with IDAPA 58.01.05.008 [40 CFR 264.77].

II.K. CLOSURE

- II.K.1. The Permittee shall meet the general closure performance standard, as specified in IDAPA 58.01.05.008 [40 CFR 264.111], during closure of all Hazardous Waste Management Units at the facility. Compliance with IDAPA 58.01.05.008 [40 CFR 264.111] shall require closure of each Hazardous Waste Management Unit in accordance with the Closure Plan, included as Attachment 9 of this Permit and all applicable requirements of Permit Condition II.K.
- II.K.2. For all Hazardous Waste Management Units, other than landfills and surface impoundments, minor deviations from the permitted closure procedures, necessary to accommodate proper closure, must be described in a narrative form with the closure certification statements. The Permittee shall describe the rationale for implementing minor changes as part of this narrative report. Within sixty (60) calendar days after completion of closure of each Hazardous Waste Management Unit, other than Landfill and Surface Impoundment Units, the Permittee shall submit the certification statements and narrative report to the Director.

- II.K.3. The Permittee shall amend the Closure Plan, in accordance with IDAPA 58.01.05.008 [40 CFR 264.112(c)], whenever necessary, by submitting a written request for a permit modification to the Director.
- II.K.4. The Permittee shall notify the Director at least sixty (60) calendar days prior to the date it expects to begin closure of any surface impoundment or landfill unit, and at least forty-five (45) calendar days prior to the date it expects to begin closure of any tanks, container storage units, or containment buildings.
- II.K.5. The Permittee shall close all Hazardous Waste Management Units within the time limits specified in the Closure Plan in Attachment 9 of this Permit, with the exception that the closure time for the surface impoundments shall be 1,460 days after receiving the final volume of hazardous wastes, unless extended, pursuant to Permit Condition V.B.
- II.K.6. The Permittee shall decontaminate or dispose of all facility equipment as specified in the Closure Plan included in Attachment 9 of this Permit.
- II.K.7. The Permittee shall provide certification statements attesting that each Hazardous Waste Management Unit at the facility has been closed in accordance with the applicable specifications in the Closure Plan included in Attachment 9 of this Permit, as required by IDAPA 58.01.05.008 [40 CFR 264.115].
- II.K.8. The Permittee shall submit to the local land use authority, and to the Director, upon submission of the certification of closure of each hazardous waste disposal unit, a survey plat indicating the waste disposal locations and dimensions, with respect to permanently surveyed benchmarks, in accordance with IDAPA 58.01.05.008 [40 CFR 264.116].
- II.K.9. In the event that any Hazardous Waste Management Unit, other than the Landfill and Surface Impoundment Units, cannot be closed by removing hazardous waste, hazardous constituents, contaminated subsoil, and any contaminated ground water (i.e., clean-closed) as specified in Permit Condition II.K.1, the Permittee shall revise the Facility Post-Closure Plan to include a Post-Closure Plan for that Hazardous Waste Management Unit. The Permittee shall submit to the Director the Post-Closure Plan for that Hazardous Waste Management Unit, as a Permit Modification Request, within ninety (90) calendar days of the date that the Director notifies the Permittee in writing that the unit must be closed as a landfill, in accordance with IDAPA 58.01.05.008 [40 CFR 264.118(a)].

II.L. COST ESTIMATE FOR FACILITY CLOSURE

- II.L.1. The Permittee shall comply with the requirements of IDAPA 58.01.05.008 [40 CFR 264.142(a)]. The Permittee shall maintain a current closure cost estimate for each individual Hazardous Waste Management Unit. The costs shall be summarized, by the Permittee, for final closure of the entire facility.
- II.L.2. In accordance with IDAPA 58.01.05.008 [40 CFR § 264.142(b)], the Permittee shall annually adjust the closure cost estimate for inflation, prior to June 1st, the anniversary date of the establishment of the original financial instrument(s) used to comply with Permit Condition II.O and IDAPA 58.01.05.008 [40 CFR 264.143].

- II.L.3. During the active life of the facility, the Permittee shall submit to the Director a revised closure cost estimate within thirty (30) calendar days of an approved modification to the Closure Plan, if such modification results in an increase in the closure cost estimate, in accordance with IDAPA 58.01.05.008 [40 CFR 264.142(c)].
- II.L.4. During the operating life of the facility, the Permittee shall keep a copy of each closure cost estimate and adjustment made at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.142(a), (b), and (c)].
- II.L.5. The Permittee shall maintain an updated summary of current closure costs for the entire facility closure, based on the Hazardous Waste Management Units that have received RCRA waste but have not yet been certified as closed, and have not been released from the financial responsibility requirements as specified in Permit Condition II.O (i.e., active units).
- II.L.6. Prior to placement of waste in any new Hazardous Waste Management Unit, the Permittee must amend, as necessary, the summary of current closure costs to reflect the estimated closure cost of that new unit. Such amended closure costs shall be annually adjusted for inflation, as required by IDAPA 58.01.05.008 [40 CFR 264.142(b)].
- II.L.7. Upon certification for closure of any Hazardous Waste Management Unit, in accordance with IDAPA 58.01.05.008 [40 CFR 264.115], and after the Director has released the Permittee from the financial responsibility requirements for that unit as specified in Permit Condition II.O, the Permittee may adjust the summary of current closure costs to reflect the closure cost of that unit. The Permittee shall submit to the Director a current version of the closure cost estimate for the facility, indicating cost estimates for each remaining unit to be closed.
- II.M. POST-CLOSURE CARE
- II.M.1. The Permittee shall comply with the approved Post-Closure Plan, included in Attachment 9 of this Permit. In addition, the Permittee shall comply with all modifications to the Post-Closure Plan, and with all provisions of IDAPA 58.01.05.008 [40 CFR 264.117, .118, .119, and .120].
- II.M.2. Except as the period may be shortened or extended, as provided in IDAPA 58.01.05.008 [40 CFR 264.117(a)(2)], the period of Post-Closure Care for each Landfill and Surface Impoundment Unit and any other closed Hazardous Waste Management Unit, as applicable, shall be thirty (30) years after Director approval of closure certification.
- II.N. COST ESTIMATE FOR POST-CLOSURE CARE
- II.N.1. The Permittee shall comply with IDAPA 58.01.05.008 [40 CFR 264.144(a)]. The Permittee shall maintain a current post-closure cost estimate for each post-closure activity.
- II.N.2. The Permittee shall annually adjust the post-closure cost estimate for inflation, prior to June 1st, the anniversary date of the establishment of the original financial

instrument(s) used to comply with Permit Condition II.P and IDAPA 58.01.05.008 [40 CFR 264.144(b)].

- II.N.3. During the active life of the facility, the Permittee shall submit to the Director a revised post-closure cost estimate, within thirty (30) days of an approved modification to the Post-Closure Plan, if such modification results in an increase in the post-closure cost estimate, in accordance with IDAPA 58.01.05.008 [40 CFR 264.144(c)].
- II.N.4. During the operating life of the facility, the Permittee shall keep a copy at the facility of each post-closure cost estimate and adjustments prepared, in accordance with IDAPA 58.01.05.008 [40 CFR 264.144(a), (b), and (c)].

II.O. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

- II.O.1. The Permittee shall comply with IDAPA 58.01.05.008 [40 CFR 264.143] by providing documentation of financial assurance, as required by IDAPA 58.01.05.008 [40 CFR 264.151], in the amount of the cost estimates required by Permit Condition II.L.1.
- II.O.2. Prior to placement of waste in any new Hazardous Waste Management Unit, the Permittee shall update the closure financial assurance mechanism, as necessary, and demonstrate that an adequately funded financial assurance mechanism for closure of the facility, including the new Hazardous Waste Management Unit, is in effect. The updated, financial assurance mechanism shall be approved by the Director before waste is placed in the new unit. (See Permit Condition II.L.6.)
- II.O.3. Changes in financial assurance mechanisms for closure must be approved by the Director, pursuant to IDAPA 58.01.05.008 [40 CFR 264.143].

II.P. FINANCIAL ASSURANCE FOR FACILITY POST-CLOSURE

- II.P.1. The Permittee shall comply with IDAPA 58.01.05.008 [40 CFR 264.145 or 264.146] by providing documentation of financial assurance, as required by IDAPA 58.01.05.008 [40 CFR 264.151], in the amount of the cost estimates required by Permit Condition II.N.1.
- II.P.2. Changes in financial assurance mechanisms for post-closure must be approved by the Director, pursuant to IDAPA 58.01.05.008 [40 CFR 264.145].

II.Q. LIABILITY REQUIREMENTS

- II.Q.1. The Permittee shall comply with the requirements of IDAPA 58.01.05.008 [40 CFR 264.147(a)] and the documentation requirements of IDAPA 58.01.05.008 [40 CFR 264.151], including the requirements to have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs.
- II.Q.2. The Permittee shall comply with the requirements of IDAPA 58.01.05.008 [40 CFR 264.147(b)] and the documentation requirements of IDAPA 58.01.05.008 [40 CFR 264.151], including the requirements to have and maintain liability coverage for non-sudden accidental occurrences in the amount of at least \$3 million per occurrence, with an annual aggregate of at least \$6 million, exclusive of legal defense costs.

II.R. INCAPACITY OF OWNERS OR OPERATORS GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee shall comply with IDAPA 58.01.05.008 [40 CFR 264.148].

II.S. EQUIVALENT MATERIALS/INFORMATION

II.S.1. If certain equipment, materials, and administrative information (such as names, phone numbers, addresses) are specified in this Permit, the Permittee is allowed to use an equivalent or superior substitute. Use of such equivalent or superior items, within the limits (e.g. ranges, tolerances, and alternatives) already specified in sufficient detail in this Permit and the Permit Attachments, shall not be considered a modification of the Permit. However, the Permittee must place in the Operating Record (prior to the institution of such revision) the revision, accompanied by a narrative explanation, and the date the revision became effective. Documentation of the substitution shall be submitted to the Director on a quarterly basis (at a minimum). The Department may judge the soundness of the revision and take appropriate action. The format of tables and forms are not subject to the requirements of this Permit, and may be revised at the Permittee's discretion.

II.S.2. If the Department determines that the substitution was not equivalent to the original, it will notify the Permittee that the Permittee's claim of equivalency has been denied, the reasons for the denial, and that the original material or equipment must be used. If the product substitution is denied, the Permittee shall comply with the original, approved product specification, find an acceptable substitution, or apply for a permit modification, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42].

II.T. AIR EMISSION STANDARDS

II.T.1. The Permittee shall comply with the Phase 1 Organic Air Emission Standards of IDAPA 58.01.08.008 [40 CFR Part 264] for hazardous waste treatment, storage, and disposal (TSD) facilities including:

- IDAPA 58.01.08.008 [40 CFR Part 264, Subpart AA] for emission standards of total organics from process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam-stripping operations that process hazardous waste, with an annual average total organic concentration of at least ten (10) parts per million by weight (ppmw).
- IDAPA 58.01.08.008 [40 CFR Part 264, Subpart BB] for emission standards that address leaks of total organics from specific equipment (i.e., pumps, valves, compressors, etc.) that contains or contacts hazardous waste that has a total organic concentration of at least 10% by weight.
- IDAPA 58.01.08.008 [40 CFR Part 264, Subpart CC] for emission standards that address the management of hazardous waste, containing an average volatile organic (VO) concentration at the point of waste origination of more than 500 ppmw, in tanks, surface impoundments, and containers.

II.T.2. The Permittee shall not treat, store, or dispose of hazardous wastes subject to IDAPA 58.01.05.008 [40 CFR 264.1082] (e.g., wastes that exceed an average volatile organic (VO) concentration at the point of waste origination of more than 500 ppmw) in tanks, surface impoundments, or containers, unless the appropriate emission control requirements are met, as specified in IDAPA 58.01.05.008 [40 CFR 264, Subpart CC]. Prior approval from the Director is required for the treatment or

disposal of wastes exceeding an average VO concentration at the point of waste origination of 500 ppmw in tanks, surface impoundments, or containers.

- II.T.3. Prior to installing or using any additional equipment (including air emission controls) subject to the requirements of IDAPA 58.01.05.008 [40 CFR Part 264, Subpart CC], the Permittee shall supply the specific Part B information required, pursuant to IDAPA 58.01.05.012 [40 CFR 270.27], and shall obtain a permit modification in accordance with the provisions of IDAPA 58.01.05.012 [40 CFR § 270.42].
- II.T.4. Prior to installing or using any equipment with process vents subject to the requirements of IDAPA 58.01.05.008 [40 CFR Part 264, Subpart AA], the Permittee shall supply the specific Part B information required, pursuant to IDAPA 58.01.05.012 [40 CFR 270.24], and shall obtain a permit modification in accordance with the provisions of IDAPA 58.01.05.012 [40 CFR 270.42].
- II.T.5. Prior to installing or using any equipment subject to the requirements of IDAPA 58.01.05.008 [40 CFR Part 264, Subpart BB], the Permittee shall supply the specific Part B information required pursuant to IDAPA 58.01.05.012 [40 CFR 270.25] and shall obtain a permit modification, in accordance with the provisions of IDAPA 58.01.05.012 [40 CFR § 270.42].
- II.T.6. The Permittee shall record the information required in accordance with IDAPA 58.01.05.008 [40 CFR 264.1089] in a log kept in the Facility Operating Record for use in determining exemptions, as provided in the Applicability Section of IDAPA 58.01.05.008 [40 CFR 264.1050].

II.U. QUARTERLY REPORTS

- II.U.1. The following reports shall be submitted to the Department on a quarterly basis:
- Minor discrepancies and items not requiring 24-hour reporting, including documentation of equivalent or superior items, , and other noncompliance items under Permit Condition I.V.; and
 - Exempt Radioactive Materials Report, providing volumes and concentrations of waste disposed.
- Note: Ground Water Monitoring Reports shall be submitted per the schedule stated in Module IX of this Permit.

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MODULE III - CONTAINER STORAGE AND TREATMENT

III. Subject to the terms of this Permit, the Permittee may store and/or treat hazardous wastes in permitted Container Management Units, as follows:

III.A. DESIGN AND OPERATION

III.A.1. The Permittee's compliance with the requirements of Permit Conditions III.A through III.C shall constitute compliance with the requirements of IDAPA 58.01.05.008 [40 CFR Part 264, Subpart I] for the management of hazardous waste in containers.

III.A.2. The Container Management Units are identified as follows: Container Storage Pad 4; Container Storage Pad 5; Container Storage Pad 7; Container Storage Pad 8; Container Storage Area 1; Stabilization Facility; and Truck Unloading Apron Nos. 1, 2, and 3. In these Container Management Units, the Permittee may store and/or treat containerized wastes, as listed on the Part A Permit Application (included as Attachment 12 of this Permit) except that the limitations designated on Table C-8 and Table C-10 of Attachment 2 of this Permit apply to the wastes stored in containers at any time.

III.A.3. The Permittee shall not store waste using glass as the primary container.

III.A.4. The quantity of 55-gallon containers stored in each designated storage unit, or its volumetric equivalent, shall be limited to the maximum storage capacities designated on Tables D-1 and D-1A of Attachment 13 of this Permit.

III.A.5. The Permittee shall store and/or treat containerized waste, in Container Management Units and in the Indoor Stabilization Building, in the manner described in Attachment 13 of this Permit, except as otherwise specified in this Permit, and in accordance with Permit Condition II.A.I. Additionally, the Permittee shall comply with all applicable sections of Attachments 2, 4, 6, 7, 15, 24, and 25 of this Permit.

III.A.6. The Permittee shall assure that the ability of the container to contain the waste is not impaired, in accordance with IDAPA 58.01.05.008 [40 CFR 264.172].

III.A.7. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition, or otherwise manage the waste in compliance with the conditions of this Permit and IDAPA 58.01.05.008 [40 CFR 264.171].

III.A.8. The Permittee shall maintain all Secondary Containment Systems, in accordance with IDAPA 58.01.05.008 [40 CFR 264.175] and the attached plans and specifications in Attachment 13 of this Permit.

III.A.9. The Permittee shall inspect the Container Management Units weekly, in accordance with IDAPA 58.01.05.008 [40 CFR 264.174] and the inspection schedules in Attachment 4 of this Permit, to detect leaking containers and deterioration of containers and the Containment System caused by corrosion and other factors. The Permittee shall document the results of all inspections and wastes analyses performed in the Operating Record.

III.A.10. The Permittee shall keep all relevant figures, drawings, and diagrams, related to the Container Management Units, readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

III.B. INCOMPATIBLE WASTE

III.B.1. The Permittee shall not place incompatible wastes, or wastes and materials which are incompatible in the same container, in accordance with IDAPA 58.01.05.008 [40 CFR 264.177].

III.B.2. The Permittee shall not place hazardous waste or materials in an unwashed container that previously held an incompatible waste or material.

III.B.3. The Permittee shall not store a container holding hazardous waste that is incompatible with any waste, or any materials stored nearby in containers, without separating these incompatible wastes or materials by protecting the wastes from commingling by means of a dike, berm, or wall.

III.C. SPECIAL REQUIREMENTS

III.C.1. The Permittee shall keep all containers closed during storage and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak, in accordance with IDAPA 58.01.05.008 [40 CFR 264.173]. The Permittee shall provide temporary cover for all water-reactive, containerized wastes (meeting Permit Condition II.C) that are stored in the Container Management Units located outside, including Container Storage Pad 4, Container Storage Pad 5, Container Storage Area 1, and the Stabilization Facility. This temporary cover may be in the form of any structure, tarp, or other device that serves to prevent precipitation from accumulating on the tops of containers. Such containers shall be covered at all times except when being removed, rearranged, inspected or otherwise managed as part of routine operation.

III.C.2. The Permittee shall not locate containers holding ignitable or reactive waste within fifteen (15) meters (50 feet) of the facility's property line. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes by following the procedures of Attachment 13 of this Permit.

III.C.3. The Permittee shall comply with Permit Condition II.T. of this Permit, for all hazardous wastes subject to IDAPA 58.01.05.008 [40 CFR 264 Subpart CC] in containers.

III.C.3.a For storage of containers of hazardous waste exceeding an average VO concentration at the point of origin of 500 ppmw, the Permittee shall comply with all applicable regulations of 40 CFR 264 Subpart CC, including the container standards in IDAPA 58.01.05.008 [40 CFR 264.1086] as specified in Permit Condition II.T.2

III.C.3.b For containers within the Container Management Units that contain organic materials, with a volatile organic concentration at the point of origin less than 500 ppmw, and are therefore exempt from using air emission control equipment, documentation shall be recorded that includes the information that was used by the Permittee for each waste determination (e.g., test results, measurements, calculations, and other documentation) in the Facility Operating Record. If

analytical results for waste samples are used for the waste determination, then the Permittee shall record the date, time, and location that each waste sample is collected, in accordance with applicable requirements of 40 CFR 264.1083, and keep this information in the Operating Record for a minimum of three (3) years.

III.C.4. Reporting Requirements:

If the Permittee does not comply with Permit Condition III.C.3., a report shall be submitted to the Director on each occurrence when hazardous waste is placed in the Waste Management Unit in noncompliance with the conditions of 40 CFR 264.1082(c)(1) or 264.1082(c)(2), as applicable. A written report shall be submitted within fifteen (15) calendar days of the time that the Permittee becomes aware of the occurrence. The written report shall contain: the EPA Identification Number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and corrective actions taken to prevent reoccurrence of the noncompliance. The report shall be signed and dated by an authorized representative of the Permittee per IDAPA 58.01.05.008 [40 CFR 264.1090].

III.D. CLOSURE AND POST-CLOSURE

Closure and Post-Closure Care of all Container Management Units shall be completed in accordance with IDAPA 58.01.05.008 [40 CFR 264.178], and the applicable sections of Attachment 9 of this Permit.

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MODULE IV - TANK STORAGE AND TREATMENT

- IV. Subject to the terms of this Permit, the Permittee may store and /or treat hazardous wastes in the permitted HWMA tanks, as follows:
- IV.A. GENERAL OPERATING REQUIREMENTS
- IV.A.1 The Permittee's compliance with the requirements of Permit Conditions IV.A through IV.F shall constitute compliance with the requirements of IDAPA 58.01.05.008 [40 CFR Part 264, Subpart J], pertaining to the management of hazardous wastes in tanks.
- IV.A.2 The Permittee shall comply with the tank operating requirements of IDAPA 58.01.05.008 [40 CFR 264.194] and Attachments 14 and 24 of this Permit.
- IV.A.3 The Permittee shall inspect the tank systems according to IDAPA 58.01.05.008 [40 CFR 264.195], and the inspection schedule contained in Attachment 4 of this Permit.
- IV.A.4 The Permittee shall maintain all Secondary Containment Systems in accordance with IDAPA 58.01.05.008 [40 CFR 264.193] and the attached plans and specifications, as contained in Attachments 14 and 24 of this Permit.
- IV.A.5. The Permittee shall remove any spilled or leaked wastes and any accumulated precipitation from the Secondary Containment Systems of each tank within 24 hours of detection, unless the waste or precipitation in the Secondary Containment System is frozen. The Permittee shall manage said wastes and precipitation as hazardous wastes. Within two (2) normal working days after the waste or precipitation in the Secondary Containment System is no longer frozen, the contained liquids will be characterized and removed.
- IV.A.6. The Permittee shall respond to leaks or spills and disposition of leaking or unfit-for-use tank systems, in accordance with IDAPA 58.01.05.008 [40 CFR 264.196].
- IV.A.7. Ignitable or reactive wastes must not be placed in tank systems unless the special requirements of IDAPA 58.01.05.008 [40 CFR 264.198] are met.
- IV.A.8. Incompatible wastes and materials must not be placed in the same tank system unless the special requirements of IDAPA 58.01.05.008 [40 CFR 264.199] are met.
- IV.A.9. The Permittee shall comply with Permit Condition II.T of this Permit, for all hazardous waste subject to IDAPA 58.01.05.008 [40 CFR Subpart CC] in tanks.
- IV.A.9.a. For tanks that manage organic materials with a volatile organic concentration at the point of origin less than 500 ppmw, and are therefore exempt from using air emission control equipment, documentation shall be recorded that includes the information that was used by the Permittee for each waste determination (e.g., test results, measurements, calculations, and other documentation) in the Facility Operating Record. If analytical results for waste samples are used for the waste determination, then the Permittee shall record the date, time, and location that each waste sample is collected in accordance with applicable requirements of 40

CFR 264.1083, and keep this information in the Operating Record for a minimum of three (3) years.

- IV.A.9.b. Reporting Requirements: If the Permittee does not comply with Permit Condition IV.A.9., a report shall be submitted to the Director on each occurrence when hazardous waste is placed in the Waste Management Unit in noncompliance with the conditions of 40 CFR 264.1082(c)(1) or 264.1082(c)(2), as applicable. A written report shall be submitted within fifteen (15) calendar days of the time that the Permittee becomes aware of the occurrence. The written report shall contain: the EPA Identification Number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and corrective actions taken to prevent reoccurrence of the noncompliance. The report shall be signed and dated by an authorized representative of the Permittee, per IDAPA 58.01.05.008 [40 CFR 264.1090].
- IV.A.10. The Permittee shall keep all relevant figures, drawings, and diagrams, related to the tank systems, readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

IV.B. BULK LIQUID STORAGE TANKS

- IV.B.1. The Bulk Liquid Storage Tanks shall be defined as four (4) existing storage tank units designated as Nos. 1, 2, 3, and 4. References to the Bulk Liquid Storage Tanks shall also include any associated piping, appurtenances, and the Secondary Containment Systems for these units.
- IV.B.2. The Bulk Liquid Storage Tanks shall be designed and operated in accordance with Attachment 14 of this Permit, except as otherwise specified in this Permit, and in accordance with Permit Condition II.A. Additionally, the Permittee shall comply with all applicable sections of Attachments 2, 4, 6, and 7 of this Permit.
- IV.B.3. The Permittee may store, in liquid form, any of the hazardous wastes listed on the Part A Form (included as Attachment 12 of this Permit), except that the limitations designated on Table C-8 and Table C-10 of Attachment 2 of this Permit apply to the wastes stored in any Bulk Liquid Storage Tank at any time.
- IV.B.4. Since the Secondary Containment Systems for Tank Nos. 1 and 4 are common and shared, the Permittee shall not at any time store incompatible wastes in Tanks Nos. 1 and 4. Similarly, since the Secondary Containment Systems for Tank Nos. 2 and 3 are common and shared, the Permittee shall not at any time store incompatible wastes in Tank Nos. 2 and 3.

IV.C. STABILIZATION MIXING BIN TANKS

- IV.C.1. The Stabilization Mixing Bin Tanks shall be defined as two (2), open-topped tank units located in the Indoor Stabilization Building. References to the above-defined Mixing Bin Tanks shall also include any appurtenances and the Secondary Containment Systems for these units.
- IV.C.2. The Mixing Bin Tanks shall be designed and operated in accordance with Attachments 14 and 24 of this Permit, except as otherwise specified in this Permit,

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and in accordance with Permit Condition II.A. Additionally, the Permittee shall comply with all applicable sections of Attachments 2, 4, 6, and 7 of this Permit.

- IV.C.3. The capacity of each installed Mixing Bin Tank located in the Indoor Stabilization Building shall not exceed 120 cubic yards.
- IV.C.4. The Permittee shall manage non-containerized waste in the Mixing Bin Tanks such that the height and location of the waste does not allow these materials to overflow.

IV.D. CLOSURE AND POST-CLOSURE

Closure and Post-Closure Care of the tank systems shall be completed in accordance with IDAPA 58.01.05.008 [40 CFR 264.197], and all applicable sections of Attachment 9 of this Permit.

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MODULE V - SURFACE IMPOUNDMENT STORAGE, TREATMENT, AND DISPOSAL

- V. Subject to the terms of this Permit, the Permittee may store, treat, and/or dispose of hazardous wastes in permitted surface impoundments, as follows:
- V.A. DESIGN AND OPERATION
- V.A.1. Surface impoundments shall consist of Collection Ponds 1, and 3, and the Evaporation Pond. (Collection Pond 2 closed in October 2011.)
- V.A.2. The Permittee may store and treat (by evaporation and physical settling) any of the liquid or semi-solid wastes that are listed on the Part A Permit Application, included as Attachment 12 of this Permit, in the Evaporation Pond, except that the following limitations apply:
- V.A.2.a. The Permittee shall not store or treat in the impoundments any wastes that are currently restricted from land disposal under IDAPA 58.01.05.011 [40 CFR Part 268] unless that waste has been granted an exemption, extension, or variance, or unless the applicable treatment standard as specified in IDAPA 58.01.05.011 [40 CFR Part 268] has been achieved prior to placement in the units. In addition, as new wastes are specified for Land Disposal Restriction under IDAPA 58.01.05.011 [40 CFR Part 268], the Permittee shall immediately cease introducing such wastes for storage and treatment in the impoundment upon the effective date of the IDAPA 58.01.05.011 [40 CFR Part 268] regulation unless the waste has been granted an exemption, extension, or variance, or meets the treatment standard as specified in IDAPA 58.01.05.011 [40 CFR Part 268], prior to placement in the units;
- V.A.2.b. The Permittee shall not store or treat any wastes that are restricted from placement in the impoundments by the limitations designated on Table C-8 and Table C-10 of Attachment 2 of this Permit;
- V.A.2.c. The Permittee shall not place hazardous wastes F020, F021, F022, F023, F026, and F027 in any surface impoundment unless the special requirements of IDAPA 58.01.05.008 [40 CFR 264.231] are met by submitting a permit modification, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42], for the addition of a management plan for handling these wastes.
- V.A.3. The Permittee shall comply with Permit Condition II.T of this Permit for all hazardous wastes subject to IDAPA 58.01.05.008 [40 CFR Subpart CC] in surface impoundments.
- V.A.3.a. For surface impoundments that receive organic wastes, with a volatile organic concentration at the point of origin less than 500 ppmw, and are therefore exempt from using air emission control equipment, documentation shall be recorded in the Facility Operating Record that includes the information that was used by the Permittee for each waste determination (e.g., test results, measurements, calculations, and other documentation). If analytical results for waste samples are used for the waste determination, then the Permittee shall record the date, time, and location that each waste sample is collected, in accordance with applicable requirements of 40 CFR 264.1083. This information shall be kept in the Operating Record for a minimum of three (3) years.

- V.A.3.b. Reporting Requirements: If the Permittee does not comply with Permit Condition V.A.3.a, a report shall be submitted to the Director on each occurrence when hazardous waste is placed in the Waste Management Unit in noncompliance with the conditions of 40 CFR 264.1082(c)(1) or 264.1082(c)(2), as applicable. A written report shall be submitted within fifteen (15) calendar days of the time that the Permittee becomes aware of the occurrence. The written report shall contain: the EPA Identification Number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and corrective actions taken to prevent reoccurrence of the noncompliance. The report shall be signed and dated by an authorized representative of the Permittee, per IDAPA 58.01.05.008 [40 CFR 264.1090].
- V.A.4. The Permittee may store and treat (by evaporation and physical settling) in Collection Ponds 1, and 3, any of the following:
- V.A.4.a. Surface run-off from the site;
- V.A.4.b. Leachate from on-site landfills; and
- V.A.4.c. Liquid from the Evaporation Pond only under the following condition:
- V.A.4.c.(1). The Evaporation Pond is required to be taken out of service and emptied as specified by the Contingency Plan (Attachment 7 of this Permit) or the Response Action Plan (Attachment 8 of this Permit).
- V.A.5. The Permittee shall maintain the design of Collection Ponds 1, and 3 and the Evaporation Pond in accordance with IDAPA 58.01.05.008 [40 CFR 264.221] and Attachments 17 and 20 of this Permit, except as otherwise specified in this Permit, and in accordance with Permit Condition II.A.
- V.A.6. The Permittee shall operate Collection Ponds 1, and 3 and the Evaporation Pond, in accordance with IDAPA 58.01.05.008 [40 CFR 264.221 and 264.227] and Attachments 2, 6, 7, 8, and 17 of this Permit, except as otherwise specified in this Permit, and in accordance with Permit Condition II.A.
- V.A.7. The Permittee shall inspect and monitor the surface impoundments in accordance with IDAPA 58.01.05.008 [40 CFR 264.226] and the inspection schedule contained in Attachment 4 of this Permit.
- V.A.8. In accordance with IDAPA 58.01.05.008 [40 CFR 264.223] and Attachment 8 of this Permit, the Permittee shall follow the Response Action Plan for any exceedance of the action leakage rate.
- V.A.9. The Permittee shall sample and analyze all liquid removed from the leak detection, collection, and removal system sump for the surface impoundments, to determine whether the liquid is derived from hazardous waste. The Permittee shall determine the list of parameters for analysis, based on its knowledge of the wastes placed in the unit. Results of analyses shall be maintained in the Operating Record. Alternatively, the Permittee may delete this sampling and analysis requirement if all liquid removed from any leachate detection, collection, and removal system sump is properly managed as hazardous waste.

- V.A.10. Ignitable or reactive wastes must not be placed in surface impoundments unless the special requirements of IDAPA 58.01.05.008 [40 CFR 264.229] are met.
- V.A.11. Incompatible wastes and materials must not be placed in surface impoundments unless the special requirements of IDAPA 58.01.05.008 [40 CFR 264.230] are met.
- V.A.12. The Permittee shall keep all relevant figures, drawings, and diagrams related to surface impoundments readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

V.B. CLOSURE AND POST-CLOSURE

- V.B.1. Closure and Post-Closure Care of the Surface Impoundment Units (Evaporation Pond, Collection Ponds 1, and 3) shall be completed in accordance with IDAPA 58.01.05.008 [40 CFR 264.228] and the applicable sections of Attachments 9, 18, and 21, and Permit Condition II.K.
 - V.B.1.a. If a soil cover is used during surface impoundment closure, prior to construction of the soil cover of the Evaporation Pond, Collection Ponds 1, and/or 3, the Permittee shall (for clay sources not previously tested) perform field/in-situ hydraulic conductivity testing on a test fill, in accordance with IDAPA 58.01.05.008 [40 CFR 264.19] and EPA/600/R-93/182, September 1993, *Quality Assurance and Quality Control for Waste Containment Facilities*. The field/in-situ testing shall be done in addition to laboratory testing.
- V.B.2. For all Surface Impoundment Units, minor deviations from the permitted closure design specifications or procedures necessary to accommodate proper closure, must be noted on the as-built drawings and the rationale for those deviations in designs, specifications, or procedures must be provided in narrative form with the closure certification statements. Within sixty (60) calendar days after completion of closure of each Surface Impoundment Unit, the Permittee shall submit to the Director the final as-built drawings of the closed unit, the narrative report, and certification statement.

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MODULE VI - LANDFILL DISPOSAL

- VI. Subject to the terms of this Permit, the Permittee may dispose of hazardous wastes in permitted Landfill Units, as follows:
- VI.A. LANDFILL DESIGN AND OPERATION
- VI.A.1. Landfills shall consist of existing units: Cell 5, Trench 10, Trench 11, Cell 14, Cell 15, and Cell 16.
- VI.A.2. The Permittee may dispose of any hazardous waste listed on the Part A Application (included as Attachment 12 of this Permit) or waste that is otherwise allowed under Idaho Rules and this Permit, in Landfill Units Cell 14, Cell 15, and Cell 16, except that the following limitations apply:
- VI.A.2.a. The Permittee shall not dispose of any waste that is restricted from placement in landfills by the limitations designated on Table C-8 and Table C-10 of Attachment 2 of this Permit.
- VI.A.2.b. The Permittee shall not dispose of wastes containing free liquids. Free liquids analyses shall be performed in accordance with the applicable procedures in Attachment 2 of this Permit.
Note: Liquid wastes that are contained in lab packs (packaged in accordance with IDAPA 58.01.05.008 [40 CFR 264.316]) or very small containers, ampules, capacitors, or batteries (in accordance with IDAPA 58.01.05.008 [40 CFR 264.314]) may be disposed without stabilization and related stabilization testing and verification procedures, provided other restrictions, as specified in this Permit or by other laws or regulations, do not prohibit the land disposal of such wastes. However, no regulated quantities of hazardous waste lab packs can be disposed in Landfill Units unless the Land Disposal Restriction Standards of IDAPA 58.01.05.011 [40 CFR 268.42(c)] are met.
- VI.A.2.c. The Permittee shall not dispose of any bulk waste that was generated as a liquid and was then stabilized by the generator (or another off-site treatment facility) unless the Permittee has conducted analytical testing to ensure that the waste has been properly stabilized and the applicable treatment standard, as specified in IDAPA 58.01.05.011 [40 CFR Part 268], has been achieved. Such testing shall be done by the Permittee, using sampling and analytical methods consistent with Permit Condition II.C, Attachments 2, 15, 24, and 25 of this Permit. Records of such analyses shall be maintained in the Operating Record for a minimum period of three (3) years. This Permit Condition (VI.A.2.c) shall not apply if the Permittee complies with Permit Condition VI.A.2.d.
- VI.A.2.d. As an alternative to the bulk waste testing by the Permittee specified in Permit Condition VI.A.2.c, the Permittee shall maintain documentation supplied by the generator (or another off-site treatment facility) that proper stabilization has been achieved. Documentation from the generator (or another off-site treatment facility) must contain a description of the stabilization procedures used, including a signed certification that the stabilized waste achieved the applicable treatment

standard, as specified in Attachment 2 of this Permit and in accordance with IDAPA 58.01.05.011 [40 CFR Part 268]. The Permittee shall maintain such documentation in the Operating Record for a minimum period of three (3) years.

- VI.A.2.e. The Permittee shall not dispose of any wastes that are restricted from land disposal under IDAPA 58.01.05.011 [40 CFR Part 268] unless that waste has been granted an exemption, extension, or variance, or unless the applicable treatment standard, as specified in IDAPA 58.01.05.011 [40 CFR Part 268], has been achieved prior to placement in the units. In addition, as new wastes are specified for Land Disposal Restriction under IDAPA 58.01.05.011 [40 CFR Part 268], the Permittee shall immediately cease disposing of such wastes upon the effective date of the regulation, unless the waste has been granted an exemption, extension, or variance, or meets the treatment standard specified in IDAPA 58.01.05.011 [40 CFR Part 268], prior to placement in the Landfill Units.
- VI.A.2.f. The Permittee shall not dispose of ignitable or reactive wastes (Waste Numbers D001 or D003, respectively) or any listed waste for which the basis for listing is ignitability or reactivity, unless the waste has been treated to render it non-ignitable or non-reactive. For such wastes, the Permittee shall follow testing procedures used to determine ignitability and reactivity as specified in Attachment 2 of this Permit.

Note: Cyanide or sulfide bearing waste, as defined in IDAPA 58.01.05.005 [40 CFR 261.23(a)(5)], may be packaged in accordance with IDAPA 58.01.05.008 [40 CFR 264.316], and disposed without first being treated to render it non-reactive. Ignitable wastes in containers may be landfilled without first being treated to render it non-ignitable, if they are disposed in accordance with IDAPA 58.01.05.008 [40 CFR 264.312].

- VI.A.2.g. The Permittee shall manage the storage of Interim Processing Loads in accordance with Attachments 4 and 19 of this Permit. Treated waste awaiting post-treatment analysis shall be staged in rolloff containers in Container Storage Area 1 (CSA 1).
- VI.A.2.h. The Permittee shall comply with IDAPA 58.01.05.008 [40 CFR 264.317], the 1995 Dioxin Management Plan, and all applicable Land Disposal Restriction treatment standards under IDAPA 58.01.05.011 [40 CFR 268.40] for disposal of hazardous wastes F020, F021, F022, F023, F026, and F027 in landfills. The Permittee shall make a written request for pre-approval from the Director for the storage, treatment, or disposal of these dioxin-listed wastes.
- VI.A.3. The Permittee shall maintain the approved designs of Trench 10, Trench 11, Cell 5, Cell 14, Cell 15, and Cell 16 in accordance with Attachments 18, 19, and 20 of this Permit, and all previously approved design criteria, except as otherwise specified in this Permit, and in accordance with Permit Condition II.A.1.
- VI.A.4. Prior to construction of any soil liner for a Landfill Unit, a compacted clay liner test pad may be required to demonstrate that the contractor's borrow, processing, and compaction operations are capable of producing low-permeability soil in conformance with project specifications. The Permittee shall seek IDEQ concurrence regarding the inclusion or exclusion of test pads prior to initiating landfill construction. All test pads shall include laboratory and field/in-situ hydraulic conductivity testing, in

accordance with Specification 02228 of Attachment 18.

- VI.A.5. The Permittee shall operate Cells 14, 15, and 16 in accordance with IDAPA 58.01.05.008 [40 CFR 264.301] and the operating practices described in Attachments 2, 6, 7, 19, and 23 of this Permit, except as otherwise specified in this Permit, and in accordance with Permit Condition II.A.1.
- VI.A.5.a. The Permittee shall cease landfilling operations when the sustained wind speed conditions exceed 25 miles per hour (25 mph average for an hour) and apply asphaltic emulsion or soil cover on the freshly spread landfill surface. Waste placement operations in the landfill cells shall resume only after the sustained wind speed is below 25 mph (25 mph average for an hour).
- VI.A.6. The Permittee shall monitor and inspect the landfill in accordance with IDAPA 58.01.05.008 [40 CFR 264.303] and Attachments 4 and 19 of this Permit.
- VI.A.7. The Permittee shall maintain a permanent and accurate record of the three-dimensional location of each waste type, based on grid coordinates, within units Cell 5, Trench 11, Cell 14, Cell 15, Cell 16, Trench 10 (to the extent the records exist for Trench 10), and records for all previous disposal areas for which the records exist, in accordance with IDAPA 58.01.05.008 [40 CFR 264.309]. This record shall include the information necessary to locate a specific waste and shall be based on information contained in the manifest (Generator Identification Number, waste code, and date of disposal). This condition shall apply to all wastes placed in existing units Cell 5, Trench 11, Cell 14, Cell 15, and Cell 16 irrespective of the date of disposal. Upon final closure of the facility, the Permittee shall submit, to the Director, copies of these records for units Cell 5, Trench 11, Cell 14, Cell 15, Cell 16, and for Trench 10 (to the extent the records exist for Trench 10).
- VI.A.8. Liquid in the primary Leachate Collection System of units Cell 5, Cell 14, Cell 15, and Cell 16 shall not exceed 30 cm (one foot) in depth over the primary liner after waste has been placed, as specified in IDAPA 58.01.05.008 [40 CFR 264.301(c)(2)]. (This does not include the area of the sump used to accumulate sufficient quantities of liquid for pumping). Liquid in the secondary Leachate (leak) Collection System of units Cell 5, Cell 14, Cell 15, and Cell 16 will be removed, when pumpable quantities exist (to the extent practicable) within 24 hours after those quantities are found. The liquid from both the primary and secondary Leachate Collection Systems shall be managed as a hazardous waste. During the Post-Closure Period, after final facility closure, liquid from the secondary Leachate (leak) Collection Systems must be pumped (as described above) within 72 hours after such liquid is found.
- VI.A.9. For all Landfill Units, the Permittee shall establish Action Leakage Rates (included in Table VI-1 of this Permit) and follow the Response Action Plan (included as Attachment 8 of this Permit), in accordance with IDAPA 58.01.05.008 [40 CFR 264.302 and 264.304].
- VI.A.10. The Permittee shall keep all relevant figures, drawings, and diagrams, related to Landfill Disposal Units, readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

VI.B. CLOSURE AND POST-CLOSURE

- VI.B.1. The Permittee shall close units Cell 14, Cell 15, and Cell 16 in accordance with IDAPA 58.01.05.008 [40 CFR 264.310(a)] and the applicable sections of Attachment 9, 9a, 9b, 18, 19, and 20 and Permit Condition II.K and II.V.2.
- VI.B.2. The Permittee shall follow the requirements for Post-Closure Care of units Cell 5, Trench 10, Trench 11, Cell 14, Cell 15, and Cell 16 in accordance with IDAPA 58.01.05.008 [40 CFR 264.310(b)], and the applicable sections of Attachment 9 and Permit Condition II.M. Post-Closure Care for each unit shall begin at the time of receipt of the closure certification statements by the Department.
- VI.B.3. For all Landfill Units, minor deviations from the permitted closure design specifications, or procedures necessary to accommodate proper closure, must be noted on the as-built drawings and the rationale for those deviations in designs, specifications, or procedures must be provided in narrative form with the closure certification statements. Within sixty (60) calendar days after completion of closure of each Landfill Unit, the Permittee shall submit, to the Director, the final as-built drawings of the closed unit, the narrative report, and certification statement. All other deviations from the permitted closure design specifications shall be approved in advance by the Director, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42].
- VI.B.4. The Permittee shall provide certification statements attesting that each Landfill Unit at the facility has been closed in accordance with the applicable specifications in the Closure Plan included as Attachment 9 of this Permit, as required by IDAPA 58.01.05.008 [40 CFR 264 Subpart G].
- VI.B.5. The Permittee shall submit to the local land use authority and to the Director, a survey plat indicating the location and dimensions of closed Landfill Units, with respect to permanently surveyed benchmarks, in accordance with IDAPA 58.01.05.008 [40 CFR 264.116].
- VI.B.6. In the event that any Hazardous Waste Management Unit, other than the Landfill and Surface Impoundment Units listed in Permit Condition V.B.1 and VI.B.1, cannot be closed by removing hazardous waste, hazardous constituents, contaminated subsoil, and any contaminated ground water (i.e., clean-closed) as specified in Permit Condition II.K.1, the Permittee shall revise the Facility Post-Closure Plan to include a Post-Closure Plan for that Hazardous Waste Management Unit. The Permittee shall submit the Post-Closure Plan for that Hazardous Waste Management Unit to the Director, as a Permit Modification Request, within ninety (90) calendar days of the date that the Director notifies the Permittee in writing that the unit must be closed as a landfill, in accordance with IDAPA 58.01.05.008 [40 CFR 264.118(a)].
- VI.B.7. The final cover design for landfill cells 14 and 15 shall be specified in Attachment 9a.
- VI.B.8. The final cover design for landfill cell 16 shall be specified in Attachment 9b.

TABLE VI-1. ACTION LEAKAGE RATES (ALR)			
Disposal Unit	Area (acres)	ALR * (gal/day)	WLR ** (gal/day)
Surface Impoundment 1 (Evaporation Pond)	2.31	2310	1732
Evaporation Pond (Reconstructed)	2.23	3,790	2,842
Collection Pond 1	0.38	380	285
Collection Pond 2(Closed October 2011)	N/A	N/A	N/A
Collection Pond 3	0.54	540	405
Landfill Cell 5 –Phase 1 (Zones 1 and 2)	1.82	182	136
Landfill Cell 5 –Phase 2 (Section 2)	1.92	192	144
Landfill Cell 5 – (Section 3)	1.62	162	121
Landfill Cell 14 – Subcell 1	4.47	447	335
Landfill Cell 14 – Subcell 2	2.32	232	174
Landfill Cell 14 – Subcell 3	2.75	275	206
Landfill Cell 14 – Subcell 4	3.00	300	225
Landfill Cell 14 – Subcell 5	3.00	300	225
Landfill Cell 14 – Subcell 6	5.17	517	388
Landfill Cell 15 – Phase 1	12.1	1,210	907
Landfill Cell 15 – Phase 2	8.5	850	637
Landfill Cell 15 – Phase 3/4	17.3	1,730	1,297
Landfill Cell 16 – Subcell 1a	9.0	1,440	1,080
Landfill Cell 16 – Subcell 2a	9.0	1,440	1,080
Landfill Cell 16 – Subcell 1b***	28.0	14,532	10,899
Landfill Cell 16 – Subcell 2b***	28.0	14,532	10,899

* Based on a 7-day average

** Measured on any given day

*** Should be adjusted to reflect the as-built footprint.

Note: ALR's based on EPA Guidance of 100 gallons per acre day (gpad) and 1,000 gpad for surface impoundments, except for Cell 16 and the Reconstructed Evaporation Pond, which have calculated ALR's.

Note: WLR's = 75% of ALR measured on any given day

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MODULE VII - SURFACE WATER MANAGEMENT PLAN

VII.A. DESIGN, OPERATION, AND MAINTENANCE OF SURFACE WATER MANAGEMENT SYSTEM

- VII.A.1. The Permittee shall construct the Surface Water Management System in accordance with the design, description and specifications in Attachments 10, and 17 of this Permit and in accordance with Permit Condition II.A of this Permit.
- VII.A.2. The Permittee shall operate and maintain the Surface Water Management System in the manner specified in Attachment 10 of this Permit and in accordance with Permit Condition II.A.1.
- VII.A.3. The Permittee shall be allowed to implement changes to the Surface Water Management Plan, in the event of emergency conditions, without obtaining a permit modification from the Department. Any emergency changes to the Surface Water Management System must be documented and reported to the Director, in writing, within thirty (30) calendar days of such changes. If the Director determines that such changes constitute a significant deviation from the Permit (Attachment 10), the Director shall notify the Permittee that a permit modification, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42], will be required. The Permittee shall submit any required Permit Modification Request within thirty (30) calendar days of such notification.
- VII.A.4. The Permittee shall be allowed to implement changes to the Surface Water Management Plan, consistent with the criteria specified in Permit Conditions VII.A.4.a and VII.A.4.b, after providing revisions to narrative, tables, and drawings in Attachment 10 necessary to incorporate these changes, and providing calculations necessary to support these changes, and upon receipt of written acceptance (by certified mail or hand delivery) of these changes by the Department. These changes and their acceptance by the Department shall not require a permit modification, pursuant to IDAPA 58.01.05.012 [40 CFR 270.42].
- VII.A.4.a. The collection ponds shall be operated to maintain available capacity for the volume from the greater of either the 25-year, 24-hour storm event, plus two (2) feet of freeboard or a 100 year, 24-hour storm; and
- VII.A.4.b. Run-off from on-site areas, which are designated within a development phase of the Surface Water Management System, to be contained on-site, shall not be diverted off-site during that development phase.
- VII.A.5. The Permittee shall keep all relevant figures, drawings, and diagrams related to the Surface Water Management Plan readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

VII.B. COMPLIANCE SCHEDULE

The portion of the facility Surface Water Management System that is designed to serve proposed Waste Management Units must be installed and operational prior to placement of waste into that unit. The Permittee shall follow the provisions of Permit Condition I.R for new system construction.

MODULE VIII - PAST PRACTICE UNITS

VIII.A. POST-COVER CARE

- VIII.A.1. The Permittee shall maintain ground water monitoring wells and implement a Ground Water Monitoring Program for Past Practice Units Silo 1, Silo 2, and Silo 3, Exhaust Shaft, the Radar Silos, the Elevator Shaft and the Control Center (the locations of which are designated on Drawing PRMI-T05a in Attachment 22 of this Permit) and Past Practice Units PCB 1, PCB 2, PCB 3, and PCB 4, Chem 1, Chem 1B, Chem 2, Chem 2B, Chem 2C, Chem 2D, Chem 2E, Chem 3, Chem 4, Chem 4B, Chem 5, Chem 5B, Chem 6, Chem 6A, Chem 6B, Chem 7, Chem 8, Chem 9, Buried Drum Area 1 (NW corner - near Silo 2), Buried Drum Area 2 (middle of site - near Silo 3), Acid Disposal Pits, Chemical Area 1, Disposal Area 9A, and the Electrical Vault (the locations of which are designated on drawings in Attachment 22 of this Permit).
- VIII.A.2. The Permittee shall conduct Post-Cover Care, inspection, and maintenance of the Past Practice Units Silo 1, Silo 2, and Silo 3 with their ancillary equipment, exhaust and propellant shafts, the Radar Silos, the Elevator Shaft, and the openings to the powerhouse dome (the locations of which are designated on Drawing PRMI-T05a in Attachment 22 of this Permit) and Past Practice Units PCB 1, PCB 2, PCB 3, and PCB 4, Chem 1, Chem 1B, Chem 2, Chem 2B, Chem 2C, Chem 2D, Chem 2E, Chem 3, Chem 4, Chem 4B, Chem 5, Chem 5B, Chem 6, Chem 6A, Chem 6B, Chem 7, Chem 8, Chem 9, and the Electrical Vault (the locations of which are designated on drawings in Attachment 22 of this Permit), as specified in Attachment 9 [Section I.3.h.(3)] of this Permit for closed Land Disposal Units, with the following exceptions:
- VIII.A.2.a. Prior to final closure, the Permittee shall inspect the leachate collection/ observation wells for Past Practice Units PCB 1, PCB 2, PCB 3, and PCB 4, Chem 1, Chem 1B, Chem 6 and Chem 6B as specified in Attachment 4 of this Permit. All pumpable quantities of liquids found in the leachate collection/ observation wells shall be removed (to the extent practical), within 24 hours of the time such liquid is found. After facility closure, the requirement for removal of leachate shall be to the extent practical within 72 hours of the time such liquid is found.
- VIII.A.2.b. The Permittee shall install and maintain the Carbon Adsorption Units for the exhaust vents of Past Practice Units Silo 1, Silo 2, Silo 3, Powerhouse Dome, the Radar Silos, and the Elevator Shaft, in accordance with the approved Silo Carbon Canister Change-out Plan (Granulated Activated Carbon Replacement Plan, January 2011).
- VIII.A.3. The period of Post-Cover Care for the Past Practice Units, designated in Permit Condition VIII.A.2, shall be at least thirty (30) years after Director approval of closure certification.
- VIII.A.4. The Director reserves the right to re-open Permit Condition VIII.A.3 and extend the Post-Cover Period for any applicable unit at any time during the life of this Permit, as deemed necessary to protect human health and the environment.
- VIII.A.5. The Permittee shall keep all relevant figures, drawings, and diagrams (related to Past Practice Units) readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

VIII.B. POST-COVER MAINTENANCE COST ESTIMATE

- VIII.B.1. The Permittee shall prepare a detailed cost estimate for inspection and maintenance of the cover systems for the Past Practice Units identified in Permit Condition VIII.A to be submitted to the Department, along with the cost estimates prepared under Permit Conditions II.L and II.N.
- VIII.B.2. The Permittee shall adjust the cost estimate for inflation within sixty (60) calendar days prior to the anniversary date on which the first cost estimate was prepared under Permit Condition VIII.B.1.
- VIII.B.3. The Permittee shall revise the post-cover cost estimate for the Past Practice Units within thirty (30) calendar days of an approved modification to the Past Practice Units.

VIII.C. POST-COVER FINANCIAL ASSURANCE

The Permittee shall, within sixty (60) calendar days of preparation of the cost estimates required by Permit Condition VIII.B.1, establish and maintain financial assurance by one of the forms provided for under IDAPA 58.01.05.008 [40 CFR 264.143 and 264.145], in the amount of the cost estimates required by Permit Condition VIII.B.

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MODULE IX – GROUND WATER MONITORING

IX.A. GROUND WATER MONITORING PROGRAM

The Ground Water Monitoring Program, applicable under the terms of this Permit, shall be undertaken in accordance with IDAPA 58.01.05.008 [40 CFR 264.97, 264.98, 264.99 and 264.100]. Table IX-1 summarizes key components of the Ground Water Monitoring Program. The Ground Water Monitoring Program shall consist of and be implemented as follows:

- IX.A.1. A Detection Monitoring Program (DMP) is currently in effect and shall remain in effect until:
 - IX.A.1.a. The detection monitoring criteria, as listed in Permit Condition IX.F.1 as the Estimated Quantitation Limits (EQL), for any single constituent(s) are exceeded. The EQL for all parameters shall be one (1) microgram per liter for any single Volatile Organic Constituent (VOC) or as specified in Table IX-2. At that time, the Permittee shall comply with Permit Condition IX.G and proceed in accordance with Permit Condition IX.A.2; or
 - IX.A.1.b. The Post-Closure Period is over.
- IX.A.2. A Compliance Monitoring Program (CMP) shall be put into effect at such time as the detection monitoring criteria are demonstrated, through Permit Condition IX.G, to have been exceeded. A CMP is currently in effect for monitoring Wells U-5, U-6, U-7, U-21, U-23, U-24, and U-25. The CMP shall remain in effect until:
 - IX.A.2.a. The detection monitoring criteria are demonstrated, through Permit Condition IX.G, to not have been exceeded during four (4) consecutive CMP sampling events, at which time the Permittee shall reactivate the DMP specified in Permit Condition IX.F; or
 - IX.A.2.b. The compliance monitoring criteria, demonstrated through Permit Condition IX.G, have been exceeded, at which time the Permittee shall proceed in accordance with Permit Condition IX.A.3 (Corrective Action).
- IX.A.3. A Corrective Action Monitoring Program (CAMP), which shall be put into effect at such time as any Ground Water Protection Standard (GPS) criteria are exceeded. The CAMP shall remain in effect until: a) the compliance monitoring criteria are not exceeded during four (4) consecutive CAMP events. At such time the CMP shall be reactivated; or b) until such time as a Corrective Measures Implementation Plan is submitted to meet the requirements of IDAPA 58.01.05.008 [40 CFR 264.100] and is approved by the Director.

TABLE IX-1. GROUND WATER MONITORING CRITERIA FOR THE GROUND WATER MONITORING PROGRAMS

MONITORING PROGRAM	BEGIN	MONITORING CRITERIA
Corrective Action Monitoring Program	In accordance with Permit Condition IX.A.3.	Exceedance of Ground Water Protection Standard for one or more constituent(s).
Compliance Monitoring Program	At Permit issuance for the following monitoring wells: U-5, U-6, U-7, U-21, U-23 U-24, U-25; or in accordance with Permit Condition IX.A.2, when the detection monitoring criteria are exceeded.	Constituent concentrations less than, or equal to, the Ground Water Protection Standards, but are greater than the Estimated Quantitation Limit of 1 microgram per liter (1 µg/l). [Refer to Table IX-6]
Detection Monitoring Program	At Permit issuance for all monitoring wells except: U-5, U-6, U-7, U-21, U-23, U-24, and U-25; or in accordance with Permit Condition IX.A.1.	Analytical results indicate constituent concentrations are below the Estimated Quantitation Limit (EQL), as shown in Table IX-2. EQLs for all constituents shall be 1 µg/l.

IX.B. GROUND WATER MONITORING WELLS

- IX.B.1. The Ground Water Monitoring Network shall consist of the Upper and Lower Aquifer monitoring wells and piezometers listed in Table IX-3, and shown on Figures 1 and 2 of this Permit. The sampling frequencies for all ground water monitoring wells are listed in Table IX-3. For each regulated unit, the point-of-compliance monitoring wells are listed in Table IX-4 and shown in Figures E-27 and E-28 of Attachment 11 of this Permit. The point-of-compliance wells for the entire site are shown in Drawing PRMI-T01F in Attachment 1 of this Permit.
- IX.B.2. All changes to the Ground Water Monitoring Network and sampling frequencies shall require a permit modification, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42] and Permit Condition I.E.3. The only exceptions to this are the monitoring wells addressed in Permit Condition IX.B.3.
- IX.B.3. Future Cell 16 construction will result in the addition of 2 new Lower Aquifer upgradient monitoring wells, Wells L-52 and L-53. Existing upgradient lower aquifer monitoring well L-38 will be plugged and abandoned. Future Cell 16 construction will also result in the plugging and abandonment of Lower Aquifer Piezometer LP-14. Cell 16 future construction will also result in the addition of new downgradient Upper Aquifer Monitoring Well U-54 and Lower Aquifer Monitoring Wells L-50 and L-51. Additionally, current upgradient Lower Aquifer Monitoring Well L-35 will be re-designated as a downgradient monitoring well. The locations of Upper and Lower Aquifer Monitoring Wells are shown on Figures 1 and 2.
- IX.B.4. The Permittee shall calculate the ground water elevations, flow directions, and rates for the Ground Water Monitoring Network on a semi-annual basis, during the spring and fall monitoring events. The methods, calculations, and parameters used shall be

provided in the Ground Water Monitoring Reports required under Permit Conditions IX.F.6 and IX.G.9. Ground water flow rates, directions, contour maps, and summary tables shall be submitted annually to the Director with the analytical results of the spring sampling event. Additionally, the Permittee shall submit, at this time, a written review of the adequacy of the Ground Water Monitoring System.

IX.C. MONITORING WELL MAINTENANCE

- IX.C.1. The Permittee shall maintain all monitoring wells in good working order, making necessary repairs in a timely manner so that the sampling program is not unreasonably hindered or delayed.
- IX.C.2. A Monitoring Well Maintenance Program consisting of wellhead monitoring, well sounding, well yield and specific capacity determination and well redevelopment will be conducted for the facility as part of the Ground Water Monitoring Program as follows:
 - IX.C.2.a. The Permittee shall perform well maintenance activities in accordance with the schedule set forth in Attachment 11 of this Permit.
 - IX.C.2.b. The Permittee shall maintain complete records of all well maintenance activities for the term of this Permit, in accordance with Permit Condition I.P.
 - IX.C.2.c. The Permittee shall inspect and maintain all monitoring wells throughout operation, closure and post-closure, in accordance with Permit Condition II.E and Attachments 4 and 11 of this Permit.
- IX.C.3. The Permittee shall maintain borehole integrity of each monitoring well, as required by IDAPA 58.01.05.008 [40 CFR 264.97(c)]. The Permittee shall maintain the wells utilized solely as piezometers, in accordance with Permit Condition IX.C.4.
 - IX.C.3.a. Monitoring wells shall be sounded every two years. If the well has a buildup of one (1) foot or more of sediment, USEI will note the buildup in the resulting monitoring report. If buildup of two (2) feet or more is measured, or if the well is unable to yield sufficient water for analysis, the well shall be redeveloped and the sediment removed prior to the next monitoring event.
 - IX.C.3.b. The Permittee shall perform a slug test or pumping test for all new monitoring wells during construction/development to determine hydraulic conductivity. This data may be used at a later date to determine adequate performance of the monitoring well.
- IX.C.4. Wells utilized solely as piezometers shall only be subject to the maintenance requirements of well head inspection and sounding. Redevelopment of these wells is only required if the buildup of sediment interferes with the Permittee's ability to take water-level measurements.
- IX.C.5. The need for maintenance shall not constitute grounds for missing a sampling event. The only reason this would constitute grounds for missing a scheduled sampling event would be the accidental destruction of the well. Under no circumstances shall a monitoring well remain out of commission for two (2) consecutive sampling events. The construction of the repair or replacement shall be in accordance with Attachment

11 of this Permit.

- IX.C.6. In the event a monitoring well is destroyed, the Permittee shall:
- Notify the Director within seven (7) calendar days of discovery of the destroyed well.
 - The Permittee shall immediately propose a new location for a replacement well that is neither less than twenty (20) feet nor more than fifty (50) feet from the original destroyed well, or other suitable location upon approval from the Director.
 - The Permittee shall plug and abandon the destroyed well in accordance with the Idaho Department of Water Resources' abandonment criteria.
 - The Permittee shall notify the Director at least five (5) days before installation of any replacement wells. Replacement wells shall be constructed in accordance with Permit Condition IX.D and Attachment 11 of this Permit.
- IX.C.7. If a monitoring well/piezometer must be replaced for any reason during the term of this Permit, it shall be replaced within ninety (90) calendar days of the date taken out of service, and/or be fully operational at the time of the next sampling event.

IX.D. MONITORING WELL CONSTRUCTION

- IX.D.1. All monitoring wells will be constructed and developed in accordance with EPA's *Technical Enforcement Guidance Document* (latest edition), Attachment 11 of this Permit, and as follows:
- IX.D.2. The Permittee shall submit to the Director a copy of the well construction report for each well, within sixty (60) days after installation, completion, and development of each well. A well is considered developed after the slug test has been completed.
- IX.D.3. The monitoring wells specified in Table IX-4 of this Permit for Cell 16 Future Construction shall be installed as follows:
- IX.D.3.a. Monitoring Wells L-52 and L-53, designated as new background Lower Aquifer monitoring wells, shall be installed and sampled over at least one hydrogeologic cycle (1 year) to establish a correlation between the new and existing wells. Once the sampling is completed, the analytical results will be submitted to the Director for evaluation. Approval of wells L-52 and L-53 as adequate replacement wells will be required prior to the abandonment or re-designation of any existing background Lower Aquifer Monitoring Wells.
- IX.D.3.b. Prior to the placement of any waste in an area of Cell 16, as described in Attachment 18, where the upper-most monitoring zone is designated as the Lower Aquifer, monitoring wells L-50 and L-51, as specified in Table IX-3 and Attachment 11, shall be fully operational. At least one sampling event shall be completed and analytical results evaluated by the Director a minimum of thirty (30) days prior to any waste placement into this area of the unit. The Monitoring Well Construction Report for Wells L-50 and L-51 shall also be submitted to and approved by the Director prior to waste placement in this area of the unit.
- IX.D.4. If at any time, perched water is identified (whether seasonal or manmade), the Permittee shall submit a Monitoring Plan, within sixty (60) calendar days, of the discovery for the Department's review and approval. The Monitoring Plan shall propose additional perched zone monitoring wells, for the purpose of determining (but not limited to) the perched water characteristics, flow path(s) and a proposed

schedule for the drilling and completion of the proposed wells.

IX.E. GROUND WATER SAMPLING AND ANALYSIS

- IX.E.1. The Permittee shall sample (semi-annually) all monitoring wells designated in Table IX-3 of this Permit. The Permittee shall perform this sampling in accordance with Permit Condition IX.A and Attachment 11 of this Permit. USEI will sample all monitoring wells for the major anions and cations listed in E.7.a.(2) of Attachment 11 during the Spring 2008 semiannual sampling event and every five (5) years thereafter.
- IX.E.1.a. The spring monitoring event shall take place during the months of April, May, or June of each year.
- IX.E.1.b. The fall monitoring event shall take place during the months of September, October, or November of each year.
- IX.E.1.c. The fall and spring monitoring events shall be separated by at least one hundred twenty (120) days.
- IX.E.2. The Permittee shall notify the Director of all planned sampling events at least five (5) working days in advance of the planned sampling, and shall notify the Director of all other sampling events, as soon as possible prior to the event.
- IX.E.3. The Permittee shall analyze the ground water samples obtained for the volatile organic compounds (VOC) or other constituents as defined on Table IX-2 of this Permit. The Permittee shall perform this analysis in accordance with Method 8260 of the Third Edition, or latest, of EPA SW-846 "Test Methods for evaluating Solid Waste, Physical/Chemical Methods" or an equivalent or superior method, with prior Director approval.
- IX.E.4. Sample Collection Procedures
- IX.E.4.a. On arrival at each wellhead, the sampling team shall determine background organic vapor levels in the breathing zone and at the level of the wellhead, in accordance with Attachment 11 of this Permit.
- IX.E.4.b. Prior to purging or sampling any monitoring wells, the elevation of the ground water shall be determined as required by IDAPA 58.01.05.008 [40 CFR 264.97(f)] and Attachment 11. Ground water elevations shall be measured to the nearest 0.01 foot. A registered surveyor shall survey the elevation datum and water level measurement point, relative to mean sea level, for all monitoring wells. This datum shall be related to a fixed reference point on the well casing, prior to the first monitoring event for each well.
- IX.E.4.c. Field Measurements for field parameters including temperature, pH, and specific conductivity shall be measured and recorded at each monitoring well, in accordance with Attachment 11.
- IX.E.4.d. Monitoring wells shall be purged of standing water in the casing. Low-yield wells shall be evacuated to dryness, and a minimum of three casing volumes shall be

removed from higher yielding wells. Casing volumes shall be calculated prior to each monitoring event. Field parameter readings shall be stabilized to within 10% for temperature and specific conductance; pH shall stabilize to within 0.1 units. For low-yielding wells purged to dryness, samples shall be collected as soon as a sufficient volume of water is available for collection. Under no circumstances shall collection of the sample take place more than 24 hours after evacuation. If adequate water is not available to sample within 24 hours, the Permittee shall notify the Director and redevelop or replace the well within ninety (90) days. The Permittee may, with prior Director approval, substitute purging stabilization parameters without effecting a modification to this Permit.

The Permittee shall store all purge water in properly labeled, secure containers until analytical results are obtained and the appropriate method of disposal of the containerized ground water is identified. Alternatively, the Permittee may assume that all purge water is hazardous waste and immediately treat the waste in an appropriate manner.

- IX.E.4.e. The Permittee shall conduct sample collection and preservation in accordance with Attachment 11 of this Permit.
- IX.E.4.f. As required by IDAPA 58.01.05.008 [40 CFR 264.97(d)(4)], and Attachment 11 of this Permit, the Ground Water Monitoring Program shall include chain-of-custody control to maintain integrity of samples.
 - IX.E.4.f.(1). A field log book shall be kept for each sampling event. A copy of the field log book shall be kept at the facility and shall be available for inspection. The field log book shall include those items in accordance with Attachment 11.
 - IX.E.4.f.(2). Upon receipt of the samples at the contract laboratory, the security of the shipping containers shall be checked. Outer seals that are broken or missing shall be noted, and reported to the Permittee's facility contact.
- IX.E.4.g. Quality Assurance of sampling, analysis, and reporting of data to the Department shall be the responsibility of the Permittee. The Permittee shall be responsible for the QA/QC activities of the samplers, drillers, and analytical laboratories. Components of the QA/QC Program shall be in accordance with Attachment 11 of this Permit; and
 - IX.E.4.g(1). A full laboratory QA/QC Report shall accompany each data report and shall be kept on file at the facility.
 - IX.E.4.g(2). Sample Collection: A standardized field log book shall be kept for each sampling event, including the information described in Attachment 11 of this Permit. It shall include documentation of all QA/QC procedures related to sample collection and the type and number of QA/QC samples. QA/QC samples may include (but are not limited to) duplicate, field, trip, lab, equipment, and blind/spike, and shall be consistent with the Third (or latest) Edition of EPA SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods."
 - IX.E.4.g(3). QA/QC of Raw Data: The raw data from the analytical laboratory, as reported, shall be reviewed to determine that it is correctly and accurately reported. If

outliers are identified and can be documented, they shall be flagged and included in the data submission.

IX.F. DETECTION MONITORING PROGRAM

- IX.F.1. The detection monitoring criteria for evaluating data from each sampling event for any volatile organic compound, shall be the EQL, of 1 microgram per liter for any single VOC, or as specified in Table IX-2 for any other constituent.
- IX.F.2. Upon detection of any VOC or other constituents exceeding an EQL for any monitoring well, the Permittee shall, within seven (7) calendar days, notify the Director in writing of the findings, in accordance with IDAPA 58.01.05.008 [40 CFR 264.98(g)(1)]. At this time, the Permittee may elect to immediately collect two (2) verification samples from any affected well(s), purging the well(s) between samples, and reanalyze for all VOCs or other constituents included in the Detection Monitoring Program.
- IX.F.3. If analytical results from either verification sample, described in Permit Condition IX.F.2, confirm the detection of VOCs or other constituents above the detection monitoring criteria, described in Permit Condition IX.F.1, the affected well(s) shall be sampled and analyzed for the constituents identified in IDAPA 58.01.05.008 [40 CFR Part 264, Appendix IX]. The Permittee shall notify the Director, in writing, within seven (7) days of making this finding and submit all analytical results. Within 90 (ninety) calendar days of confirmation of an exceedance, as described in Permit Condition IX.F.2, the Permittee shall submit to the Director either of the following:
- IX.F.3.a. A report summarizing the analytical results from the monitoring events described in Permit Conditions IX.F.2 and IX.F.3, and the notification that the affected well(s) is being removed from the Detection Monitoring Program and is being incorporated into the CMP or CAMP; or
- IX.F.3.b. A report demonstrating that a source, other than a regulated unit or Past Practice Unit, caused the detection or that the detection resulted from an error in sampling, analysis, or evaluation. This demonstration report must be submitted to the Director for approval.
- IX.F.4. If the Permittee is unable to verify that the source of contamination is from other than a regulated unit or Past Practice Unit (in accordance with Permit Condition IX.F.3.b), or if the report submitted in accordance with Permit Condition IX.F.3.b is not approved by the Director, then the Permittee shall, within 90 (ninety) days of receiving notice the demonstration report of Section IX.F.3 has been denied, remove the affected well(s) from the Detection Monitoring Program and incorporate the affected well and all other monitoring wells associated with the applicable Hazardous Waste Management Unit or Past Practice Unit into the Compliance Monitoring Program, in accordance with Permit Condition IX.G.
- IX.F.5. If analytical results from both verification samples, described in Permit Condition IX.F.2, fail to confirm the detection of VOCs or other constituents above an EQL, the Director shall be notified in writing that the affected well(s) will remain in the Detection Monitoring Program.
- IX.F.6. Data Reporting for Detection Monitoring

While in the Detection Monitoring Program, the Permittee shall submit to the Director a semi-annual Detection Monitoring Report, in accordance with Permit Condition IX.E.1. This report shall contain a narrative summary of ground water monitoring data that has been collected to date, and a detailed listing of the monitoring and analytical data obtained since submitting the previous report, including (at a minimum) all QA/QC information, a table summary of ground water elevations, all equations, calculations, and parameters used to calculate ground water velocities and flow direction, in accordance with Permit Condition IX.B.4.

IX.G. COMPLIANCE MONITORING PROGRAM

- IX.G.1. As of the effective date of this Permit, Monitoring Wells U-5, U-6, U-7, U-21, U-23, U-24, and U-25 are in the Compliance Monitoring Program. All other compliance monitoring wells shall be determined in accordance with Permit Condition IX.A.2.
- IX.G.2. The Permittee shall sample the monitoring wells in the Compliance Monitoring Program semi-annually, during the compliance monitoring period.
- IX.G.3. The Permittee shall perform this sampling in accordance with Permit Condition IX.E, and as follows:
 - IX.G.3.a. The Permittee shall sample the CMP wells for the VOCs or other constituents outlined in Table IX-2.
 - IX.G.3.b. On an annual basis, the Permittee shall sample all monitoring wells in the CMP and analyze for the constituents identified in IDAPA 58.01.05.008 [40 CFR Part 264, Appendix IX], in lieu of the parameters outlined in Permit Condition IX.G.3.a. Upon detection of any additional monitoring constituents, as a result of the annual Appendix IX sampling, the permittee may resample within thirty (30) days and repeat the Appendix IX analysis. The Permittee shall submit the resample analytical results to the Director, and if the second analysis confirms the presence of the new constituents, the Permittee shall, within seven (7) calendar days of receiving the data that identifies new constituents, notify the Director in writing of the findings and the new constituents shall be included in the Detection and Compliance Monitoring Programs.
 - IX.G.3.c. All analytical results shall meet the established reporting limit or EQL. If the reporting limit is greater than the established EQL, the Director may require the analysis to be rerun.
- IX.G.4. The Permittee shall obtain water-level measurements from the CMP wells prior to each sampling event. Measurements for each monitoring well shall be obtained prior to purging the well. The Permittee shall incorporate this data in determining the rate and direction of ground water flow annually, in accordance with Permit Condition IX.B.5.
- IX.G.5. Data Evaluation for Compliance Monitoring
 - IX.G.5.a. Data in the CMP will be evaluated by comparing the analytical results to the GPS(s) presented in Table IX-6. Level 1 monitoring well criteria was established by the Alternate Concentration Limits (ACL) presented in Table IX-6. The GPSs

for Level 2 monitoring wells shall be those established in Table IX-6 of this Permit and determined by Permit Conditions IX.G.5.b through IX.G.5.d, IX.G.8, and IX.G.9, and as follows:

- IX.G.5.b. The down-gradient monitoring wells have been divided into two (2) categories as follows:
- IX.G.5.b.(1). Level 1 Compliance Wells:
Level 1 Compliance Wells consist of interior monitoring wells located down-gradient of designated Solid Waste Management Units and regulated units and include the following Wells: U-17, U-18, U-19, U-21, U-22, U-23, U-24, U-25, U-48, U-49, U-54, UP-6, L-31, L-32, L-33, L-37, L-39, L-41, and L-42.
- IX.G.5.b.(2). Level 2 Compliance Wells:
Level 2 Compliance Wells consist of down-gradient wells on the eastern and northern site boundaries where ground water flow paths will potentially carry impacted ground water off the facility. Level 2 Compliance Wells consist of the following wells: U-5, U-6, U-7, U-8, U-9, U-10, U-11, U-12, L-28, L-29, L-30, L-43, L-44, L-45, and L-47.
- IX.G.5.c. The compliance monitoring criteria (GPS) for evaluating data collected from Level 1 and Level 2 Compliance Wells for each monitoring event for any anthropogenic organic compound, shall be as follows:
- IX.G.5.c.1. Level 1 Compliance Wells
For any single Table IX-2 organic constituent, the GPS will be equal to one-half percent (0.5%) of its solubility in water, as presented in Table IX-6. If multiple constituents are present, a cumulative total of 0.5% solubility based on the summation of solubility percentages, presented by the concentration of each constituent detected.
- IX.G.5.c.2. Level 2 Compliance Wells
For any single Table IX-2 organic constituent, the GPS will be equal to the Maximum Concentration Limit (MCL), as established by EPA, for drinking water presented in Table IX-6; or
- IX.G.5.c.2(a). Where an MCL has not been established, the EPA Regional Screening Level for tapwater calculated at a concentration equal to 1×10^{-5} cancer risk for carcinogenic constituents or a hazard quotient of 1, for non-carcinogens, will apply. These values will be obtained from the EPA Regional Screening Levels for Chemical Contaminants, and are presented in Table IX-6..
- IX.G.5.c.2(b). If multiple carcinogenic compounds are present, in the same well, but none exceed their respective MCL (if available), a cumulative 1×10^{-5} industrial cancer risk shall be calculated.
- IX.G.5.c.2(c). If multiple non-carcinogenic hazardous constituents are present, in the same well, but none exceed their respective MCL (if available), the cumulative hazard quotient shall be calculated. The action criteria shall be based upon a cumulative hazard quotient of 1.

- IX.G.5.c.2.(d). In the event additional anthropogenic compounds are identified through Appendix IX sampling, GPSs for Level 1 and Level 2 Monitoring Wells shall be established and incorporated into this Permit through a modification.
- IX.G.5.d. The tapwater regional screening levels in Table IX-6 will be updated during the Permit Reopener five (5) years from the effective date of permit issuance per IDAPA 58.01.05.012 [40 CFR 270.50(d)]. Screening levels will be updated, based on the published values in EPA's Regional Screening Levels for Chemical Contaminants.
- IX.G.5.e. Upon detection of VOC concentrations at concentrations exceeding the GPSs, set forth in Permit Condition IX.G.5. and/or listed in Table IX-6 of this Permit, the Permittee shall:
- IX.G.5.e(1). Notify the Director of the finding (in writing) within seven (7) calendar days of receipt of the analytical results, identifying the presence of contaminants at or above the established GPSs, in accordance with IDAPA 58.01.05.008 [40 CFR 264.99(h)(1)]. At this time, the Permittee may elect to immediately collect two (2) verification samples from any affected well(s), purging the well(s) between samples, and reanalyze for all compounds required in the Compliance Monitoring Program. If analytical results from either verification sample confirm the detection of compounds above the Compliance Monitoring Criteria, as specified in Permit Condition IX.G.5.a, then the Permittee shall:
- IX.G.5.e(2). Submit to the Director a Corrective Action Plan, in accordance with IDAPA 58.01.05.008 [40 CFR 264.100], applicable to the affected area(s) and constituents, within 120 calendar days of receipt of the analytical results, identifying the presence of contaminants at or above the established GPSs; or
- IX.G.5.e(3). Submit to the Director, a report demonstrating that a source (other than a Past Practice Unit or regulated unit) caused the contamination and/or that the reported contaminant concentrations resulted from an error in sampling, analysis, or evaluation. In making this demonstration, the Permittee shall follow procedures in accordance with IDAPA 58.01.05.008 [40 CFR 264.99(i)]:
- Notify the Director, in writing, within seven (7) calendar days of the Permittee's intent to make such a demonstration;
 - Within ninety (90) days, submit a report to the Director that demonstrates that a source (other than the Past Practice Unit or regulated unit) caused the standard to be exceeded or that the apparent noncompliance with the standards resulted from an error in sampling, analysis, or evaluation;
 - Within ninety (90) days, submit to the Director an application for a permit modification to make any appropriate changes to the Compliance Monitoring Program at the facility; and
 - Continue ground water monitoring for the affected well(s), in accordance with the Compliance Monitoring Program.
- IX.G.6. The Permittee shall continue the Compliance Monitoring Program at the affected well(s) until:
- IX.G.6.a. Constituents identified in the affected well(s) do not exceed the detection monitoring criteria (EQL) specified in Permit Condition IX.A.1.a for four (4) consecutive sampling events; or

IX.G.6.b. The Permittee enters into a Corrective Action Program under IDAPA 58.01.05.008 [40 CFR 264.101] for the affected area(s).

IX.G.7. If the Permittee determines that the Compliance Monitoring Program no longer satisfies the requirements of the IDAPA 58.01.05.008 [40 CFR 264.99], the Permittee shall, within ninety (90) days, submit an application for permit modification to make any appropriate changes to the program, in accordance with IDAPA 58.01.05.008 [40 CFR 264.99(j)].

IX.G.8. In the event VOCs are detected above an EQL in an up-gradient or background monitoring well, the well shall be incorporated in the Compliance Monitoring Program, as a Level 1 Compliance Well, in accordance with Permit Condition IX.G.

IX.G.9. Data Reporting for Compliance Monitoring

While in the Compliance Monitoring Program, the Permittee shall submit a semi-annual Compliance Monitoring Report, to the Director, in accordance with Permit Condition I.P.6. This report shall contain a narrative summary of ground water monitoring data that has been collected over the past five (5) years, a detailed listing of the monitoring, and analytical data obtained since the previous report (including any/all newly identified compounds from the Appendix IX Sampling), and (at a minimum) all QA/QC information, a table summary of ground water elevations, all equations, calculations, and parameters used to calculate ground water velocities, and ground water flow direction, in accordance with Permit Condition IX.B.4.

IX.H. POST-CLOSURE AND POST-COVER CARE MONITORING

IX.H.1. All procedures described in Part IX of this Permit for inspection, maintenance, and monitoring shall apply to the Post-Closure Care Period, as well as the active life of each regulated unit, and to the Post-Cover Care Period for each Past Practice Unit.

IX.H.2. The period of Post-Closure for each regulated unit shall be as specified in Permit Condition II.M.2. The period of Post-Cover Care for each Past Practice Unit shall be as specified in Permit Conditions VIII.A.3 and VIII.A.4.

IX.I. UNSATURATED ZONE MONITORING

Upon the Director's request, the Permittee shall prepare a Work Plan for the design, construction, operation, and maintenance of an Unsaturated Zone Monitoring System for the facility, capable of detecting changes from unsaturated to saturated conditions that could move contaminants laterally above the monitored aquifer. The Director shall reserve the right to reopen this permit condition, at any time, to include a specific design and implementation schedule, if the Director determines that the Permittee is not making all reasonable efforts to meet this permit condition. The reopening of this permit condition would be done as an agency-initiated permit modification under IDAPA 58.01.05.012 [40 CFR § 270.41].

IX.J. COMPLIANCE SCHEDULE — RISING WATER TABLE STUDY

IX.J.1. On December 17, 1998, the Department approved the Rising Water Table Study Work Plan. The Department evaluated the Rising Ground Water Study's results and issued a conditional approval on November 23, 1999. As stated in the approval, the

Permittee shall submit in reports to the Director (every two years) the continuing evaluations of the rising ground water, beginning in 2001. In 2006, DEQ approved a request by the Permittee to change to a five (5) -year interval for evaluation of the rising ground water. These reports shall include a summary of current rising ground water conditions, an assessment of the probable scenarios causing the rising ground water, an evaluation of the potential consequences to the Ground Water Monitoring Network (due to the rising ground water), and a description of proposed future tasks to address the situation.

- IX.J.2. Failure on the part of the Permittee to carry out the approved Work Plan in the time specified shall be deemed as a violation of this Permit unless the Permittee has been granted a written extension from the Department.

TABLE IX-2. CONSTITUENTS FOR DETECTION MONITORING PROGRAM		
Constituent	CAS No.	EQL (ug/l)
Benzene	71-43-2	1
Bromodichloromethane	75-27-4	1
Bromoform	75-25-2	1
Bromomethane	74-83-9	1
Carbon Tetrachloride	56-23-5	1
Chlorobenzene	108-90-7	1
Chloroethane	75-00-3	1
Chloroform	67-66-3	1
Chloromethane	74-87-3	1
Cis-1,2-Dichloroethene	156-59-2	1
Trans-1,2-Dichloroethene	156-60-5	1
Dibromochloromethane	124-48-1	1
1,1-Dichloroethane	75-34-3	1
1,2-Dichloroethane	107-06-2	1
1,1-Dichloroethene	75-35-4	1
1,2-Dichloropropane	78-87-5	1
Cis-1,3-Dichloropropene	10061-01-5	1
Trans-1,3-Dichloropropene	10061-02-6	1
Ethylbenzene	100-41-4	1
Methylene Chloride	75-09-2	1
1,1,2,2-Tetrachloroethane	79-34-5	1
Tetrachloroethene	127-18-4	1
Toluene	108-88-3	1
1,1,1-Trichloroethane	71-55-6	1
1,1,2-Trichloroethane	79-00-5	1
Trichloroethene	79-01-6	1
1,1,2-Trichlor-1,2,2-Trifluoroethane (CFC 113)	76-13-1	1
Vinyl chloride	75-01-4	1

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TABLE IX-3. GROUND WATER MONITORING NETWORK		
Well ID	Description	Sampling Frequency
U-13	Upgradient	Semiannual
U-14	Upgradient	Semiannual
U-15	Upgradient	Semiannual
U-4	Upgradient	Semiannual
U-5	Level 2	Semiannual
U-6	Level 2	Semiannual
U-7	Level 2	Semiannual
U-8	Level 2	Semiannual
U-9	Level 2	Semiannual
U-10	Level 2	Semiannual
U-11	Level 2	Semiannual
U-12	Level 2	Semiannual
U-17	Level 1	Semiannual
U-18	Level 1	Semiannual
U-19	Level 1	Semiannual
U-21	Level 1	Semiannual
U-22	Level 1	Semiannual
U-23	Level 1	Semiannual
U-24	Level 1	Semiannual
U-25	Level 1	Semiannual
U-48	Level 1	Semiannual
U-49	Level 1	Semiannual
U-54	Level 1	Semiannual
UP-6	Level 1	Semiannual
L-28	Level 2	Semiannual
L-29	Level 2	Semiannual
L-30	Level 2	Semiannual
L-31	Level 1	Semiannual
L-32	Level 1	Semiannual
L-33	Level 1	Semiannual
L-35	Upgradient	Semiannual
L-36	Upgradient	Semiannual
L-37	Level 1	Semiannual
L-38	Upgradient	Semiannual
L-39	Level 1	Semiannual
L-41	Level 1	Semiannual
L-42	Level 1	Semiannual
L-43	Level 2	Semiannual
L-44	Level 2	Semiannual
L-45	Level 2	Semiannual
L-47	Level 2	Semiannual
LP-11, LP-12, LP-13, LP-14, LP-15, LP-27	Piezometer	Semiannual Water Levels Only
UP-1, , UP-3, UP-4, UP-5, UP-7, UP-8, U-26, UP-26, ,	Piezometer	Semiannual Water Levels Only

TABLE IX-4. MONITORING WELL SUMMARY		
UPPER AQUIFER		
Well No. ^a	Old Well No. ^b	Well Material ^c
Background Wells		
U-13	N-A	SS
U-14	N-A	SS
U-15	N-A	SS
U-4	UMW-37	SS
Regulated Units Trench 11 and Collection Pond 1		
U-5	None	SS
U-6	MW-9	SS
U-7	UMW-47	SS
Regulated Unit Collection Pond 3 and Past Practice Units PCB 1, 2, and 3, Acid Disposal Pits, CHEM Area 1, CHEM-1, CHEM-2, CHEM-2B, CHEM-2C, CHEM-2D, CHEM-2E, CHEM-3, CHEM-4, CHEM-4B, CHEM-5, CHEM-5B, CHEM-6, CHEM-6A, CHEM-6B		
U-9	None	SS
U-10	MW-11	SS
Regulated Unit Evaporation Pond 1		
U-11	None	SS
U-12	None	SS
Regulated Units Trench 10 and Collection Pond 2		
U-8	UMW-46	SS
Past Practice Unit Silo 3		
UP-6	None	SS
Past Practice Unit Silo 2		
U-21	SW-2	SS
Past Practice Unit Silo 1		
U-22	SW-1	SS
Past Practice Unit Trench PCB-4		
U-17	UWL-41	SS
U-18	UWL-40	SS
U-19	UWL-39	SS
Past Practice Unit Buried Drum Area 2 (Near Silo 2)		
U-18	UMW-40	SS
U-19	UMW-39	SS

- a Well No.-designates the Monitoring Well Numbering System pursuant to this Permit, and as designated on Figures 1 and 2 of this permit.
- b Old Well No. –designates ESII Well Numbering System
- c Well Materials = Materials below static water level: SS-Either 304 stainless steel or Schedule 80 PVC; PVC=Schedule 40 polyvinyl chloride.

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 MODIFICATION DATE: April 02, 2018

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TABLE IX-4. MONITORING WELL SUMMARY		
UPPER AQUIFER		
Well No. ^a	Old Well No. ^b	Well Material ^c
Past Practice Unit Buried Drum Area 1 (Near Silo 3)		
U-19	UMW-39	SS
Past Practice Unit Control Center		
U-17	UWL-41	SS
Past Practice Unit Elevator Shaft and Disposal Area 9		
U-17	UWL-41	SS
U-18	UWL-40	SS
Past Practice Unit Electrical Vault		
U-17	UWL-41	SS
Regulated Unit Cell 5		
U-23	UPCB-1	PVC
U-24	PCB-3	SS
U-25	UMW-36	SS
Regulated Unit Cell 16		
U-48	N-A	SS
U-49	N-A	SS
U-54	N-A	SS
LOWER AQUIFER		
Regulated Unit Cell 14		
L-28 Subcell 1	LMW-49	SS
L-29 Subcell 2	LMW-50	SS
L-30 Subcell 3	LMW-51	SS
L-39 Subcell 4	None	SS
L-32 Subcell 5	LMW-53	SS
L-33 Subcell 6	LMW-31	SS
Past Practice Units Radar (Antenna) Silos		
L-31	UML-42	SS
Background Wells		
L-35	LMW-30	PVC
L-38	LMW-13	PVC
L-52(future)	N-A	SS
L-53(future)	N-A	SS

TABLE IX-4. MONITORING WELL SUMMARY		
LOWER AQUIFER		
Well No.^a	Old Well No.^b	Well Material^c
Regulated Unit Cell 15		
L-36	LMW-27	PVC
L-37	LMW-28	PVC
L-41	N-A	SS
L-42	N-A	SS
L-43	N-A	SS
L-44	N-A	SS
L-45	N-A	SS
L-47	N-A	SS
Regulated Unit Cell 16		
L-50(future)	N-A	SS
L-51(future)	N-A	SS

TABLE IX-5. EXISTING PIEZOMETERS			
<u>Upper Aquifer</u>		<u>Lower Aquifer</u>	
Well No.	Old Well No.	Well No.	Old Well No.
UP-1	D-19	LP-11	D-29
UP-3	PCB-2	LP-12	MW-21
UP-4	MW-21	LP-13	MW-25
UP-5	MW-10	LP-14	MW-14
UP-7	MW-1	LP-15	MW-24
UP-8	SW-1-2	LP-27	
UP-26			
U-26			

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TABLE IX-6. ALTERNATE CONCENTRATION LIMITS AND GROUND WATER PROTECTION STANDARDS, LEVEL 1 AND LEVEL 2 COMPLIANCE MONITORING WELLS

Compliance Monitoring Constituent	Level 1 Compliance Wells	Level 2 Compliance Wells Tapwater Regional Screening Levels		MCL ug/L	Applicable Criteria for Level 2 Compliance Wells
	Concentration @ 0.5% Solubility ug/L	Concentration @ Industrial HQ=1 ug/L	Concentration @ 1 x 10 ⁻⁵ Cancer Risk ug/L		
Benzene	8.90E+03			5E+00	MCL
Bromodichloromethane	2.25E+04			8E+01	MCL
Bromoform (Tribromomethane)	1.60E+04			8E+01	MCL
Bromomethane	6.50E+04	7.5E+00		N-A	HQ
Carbon Tetrachloride	4.00E+03			5E+00	MCL
Chlorobenzene	2.44E+03			1E+02	MCL
Chlorodibromomethane	2.00E+04			8E+01	MCL
Chloroethane (Ethyl chloride)	2.87E+04	2.1E+04		N-A	HQ
Chloroform	4.65E+04			8E+01	MCL
Chloromethane	3.18E+04	1.9E+02		N-A	HQ
1,1-Dichloroethane	2.75E+04		2.7E+01	N-A	CR
1,2-Dichloroethane (EDC)	4.35E+04			5E+00	MCL
1,1-Dichloroethene	2.00E+03			7E+00	MCL
Cis-1,2-Dichloroethene	3.00E+03			7E+01	MCL
Trans-1,2-Dichloroethene	3.00E+03			1E+02	MCL
1,2-Dichloropropane	1.35E+04			5E+00	MCL
Cis-1,3-Dichloropropene	1.40E+04		4.7E+00	N-A	CR
Trans-1,3-Dichloropropene	1.40E+04		4.7E+00	N-A	CR
Ethylbenzene	7.60E+02			7E+02	MCL
Methylene Chloride (Dichloromethane)	8.35E+04			5E+00	MCL
1,1,2,2-Tetrachloroethane	1.45E+04		7.6E-01	N-A	CR
Tetrachloroethene (PCE)	7.50E+02			5E+00	MCL
Toluene	2.55E+03			1E+003	MCL
1,1,1-Trichloroethane	2.20E+04			2E+02	MCL
1,1,2-Trichloroethane	2.25E+04			5E+00	MCL
Trichloroethene (TCE)	5.50E+03			5E+00	MCL
1,1,2-Trichlor-1,2,2-trifluoroethane (CFC-113)	8.5E+02	5.5E+04		N-A	HQ
Vinyl Chloride	5.50E+03			2E+00	MCL

MODULE X - INDOOR STABILIZATION BUILDING AND DEBRIS TREATMENT

X. Subject to the terms of this Permit, the Permittee may store and/or treat hazardous wastes in the Indoor Stabilization Building, as follows:

X.A. INDOOR STABILIZATION BUILDING

X.A.1. Indoor Stabilization Building Design and Equipment

The Indoor Stabilization Building is enclosed; and in areas where waste could become mobile, air pollution control equipment has been installed. Drawings D2020-H01, D2020-H03, and D2020-H04 in Attachment 20 of this Permit provide design details of the Air Handling and Pollution Control System for the containment building. The Indoor Stabilization Building contains two (2) Mixing Bin Tanks. The Mixing Bin Tanks are further described in Permit Module IV. No container storage is permitted within the building.

X.A.1.a. The Permittee shall keep all relevant figures, drawings, and diagrams related to the stabilization building readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

X.A.1.b. Within forty-five (45) days after approval of the CQA Report for the Indoor Stabilization Building, the Permittee shall submit all relevant updated drawings, which were not included in the CQA Report, illustrating current conditions in the Indoor Stabilization Building.

X.A.2. Indoor Stabilization Building Operation

X.A.2.a. The Permittee shall follow the approved stabilization building operation procedures, included as Attachments 2, 4, 6, 7, 13, 14, 24, and 25 of this Permit, and as provided by Permit Conditions X.A.2.a.(1) through (4).

X.A.2.a.(1). The Permittee shall operate the stabilization building so as not to exceed the maximum waste processing rate for the building of 300 tons of waste per hour for the building based on a daily average, nor exceed 2,628,000 tons of waste per year for the building.

- X.A.2.a.(3). The Permittee shall maintain non-containerized waste in the containment building sort floors such that the height and location of the waste does not allow these materials to escape or overflow the walls of the containment area.
- X.A.2.a.(2). In the event of a power outage, or other event that reduces the operating efficiency below the manufacturer's specifications of the air pollution control equipment for the mixing bins, the Permittee shall cease all hazardous waste and debris treatment operations in the mixing bins that generate a "fine waste" until such time as the power is restored, or the air pollution control equipment is repaired.
- X.A.2.a.(3). The Permittee shall operate, service, and maintain the air pollution control equipment listed and/or depicted in Attachment 24 of this Permit according to the manufacturers' recommended instructions and/or specifications, which shall be maintained on-site.
- X.A.2.a.(4). Closure of the Indoor Stabilization Building and associated areas and equipment shall be conducted in accordance with Attachment 9 of this Permit.

X.B. HAZARDOUS DEBRIS TREATMENT

- X.B.1. All hazardous waste and debris-processing operations including unloading, staging, storing, sorting, pre-treating, or treating shall be conducted in compliance with IDAPA 58.01.05.011 [40 CFR Part 268] and Attachment 25 of this Permit. The hazardous waste and debris treatment processes include, but are not limited to, the following (as described in Attachment 25): stabilization, microencapsulation, macroencapsulation, chemical oxidation, chemical reduction, deactivation, solidification, neutralization, precipitation, adsorption, bioremediation, size reduction, decanting, and mechanical processing (sorting/crushing).
- X.B.2. Hazardous waste and debris processing, treatment, and storage shall be in accordance with Attachments 2, 4, 6, 7, 13, 14, 15, 24, and 25 of this Permit.
- X.B.3. Hazardous waste and debris processing, treatment, and storage shall be in accordance with Permit Condition II.T and IDAPA 58.01.05.008 [40 CFR 264 Subpart CC].
- X.B.4. Hazardous waste and debris treated by the Permittee, using macroencapsulation or microencapsulation technologies, shall meet the requirements of IDAPA 58.01.05.011 [40 CFR 268.45, Table 1] and the following permit conditions.
- X.B.5. Macroencapsulation
 - X.B.5.a. The Permittee shall conduct macroencapsulation treatment of hazardous debris in the Indoor Stabilization Building and in Container Storage Pads 4, 5, and 7 and at the Outdoor Stabilization Facility in accordance with Attachments 13, 15, and 25 of this Permit, and as provided by Permit Conditions X.B.5.a.(1) through X.B.5.a.(3).
 - X.B.5.a.(1). For macroencapsulation of hazardous debris, the Permittee shall use only high density polyethylene liner materials or polyethylene drums as specified in Attachment 25 of this Permit.

X.B.5.a.(2). For macroencapsulation of large pieces of debris that are wrapped or coated with an inert surface coating material, the Permittee shall demonstrate to the Director that the requirements of IDAPA 58.01.05.011 [40 CFR 268.45, Table 1] have been met.

X.B.5.a.(2)(a). Upon the Director's approval of the demonstration in Permit Condition X.B.5.a.(2), the Permittee may begin utilizing the requested macroencapsulation process.

X.B.5.a.(3). Landfill placement of containers of macroencapsulated hazardous debris shall be in accordance with Attachments 19 and 25 of this Permit.

X.B.6. Microencapsulation

X.B.6.a. The Permittee shall conduct microencapsulation treatment of hazardous debris in accordance with Attachment 25 of this Permit, and as provided by the following permit conditions.

X.B.6.b. The Permittee shall conduct microencapsulation of hazardous debris at the Stabilization Facility or the Indoor Stabilization Building.

X.B.6.c. All size reduction operations of hazardous debris, prior to microencapsulation treatment, shall be performed at the Stabilization Facility or the Indoor Stabilization Building. Additional locations for size reduction operations, such as Container Management Units, may be utilized upon the Director's approval.

X.B.6.d. Landfill placement of microencapsulated hazardous debris shall be in accordance with Attachment 19 and 25 of this Permit.

X.C. CYANIDE DESTRUCTION

X.C.1. Cyanide destruction shall be conducted in accordance with all applicable sections of Attachments 2, 4, 6, 7, and 25 of this Permit.

X.C.2. Cyanide destruction performed by the Permittee shall be limited to chemical oxidation (e.g., alkaline chlorination), and shall be limited to the following parameters in order to protect human health and the environment:

- Waste which are RCRA-regulated for cyanide may be accepted for cyanide destruction provided that the appropriate safety controls and procedures are followed.
- Cyanide destruction shall be performed in the Stabilization Facility and/or the Indoor Stabilization Building in containers and/or the Mixing Bin Tanks.

X.D. CLOSURE AND POST-CLOSURE

Closure and Post-Closure Care of the Containment Building shall be completed in accordance with IDAPA 58.01.05.008 [40 CFR 264.197], and all applicable sections of Attachment 9 of this Permit.

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MODULE XI - STABILIZATION OPERATIONS

XI.A. GENERAL OPERATING REQUIREMENTS

- XI.A.1. The Permittee shall remove spilled or leaked wastes and accumulated liquid from the Secondary Containment Systems of the Stabilization Facility and the Indoor Stabilization Building within 24 hours of detection, unless the waste or liquid in the Secondary Containment System is frozen. The Permittee shall manage these wastes and liquid as hazardous wastes. Within two (2) normal working days after the waste or liquid in the Secondary Containment System is no longer frozen, the contained liquids will be characterized and removed.
- XI.A.2. The Permittee shall keep all relevant figures, drawings, and diagrams related to the Stabilization Facility and Indoor Stabilization Building readily available for inspection at the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.74].

XI.B. STABILIZATION FACILITY

- XI.B.1. The outdoor Stabilization Facility includes 52 cubic yard rolloffs (stabilization bins) and shall be designed, constructed, and operated by the Permittee in accordance with Attachments 2, 4, 6, 7, 13, 15, 24, and 25 of this Permit, except as otherwise specified in this Permit, and in accordance with Permit Conditions II.A.1 and II.A.2.
- XI.B.2. The Permittee may conduct treatment utilizing stabilization at the Stabilization Facility on all hazardous wastes listed in the Part A Permit Application (included as Attachment 12 of this Permit), except for "fine wastes" as defined in Attachment 2, and subject to any other applicable conditions in Attachment 2 of this Permit that apply to hazardous wastes to be stabilized.

XI.C. INDOOR STABILIZATION BUILDING

XI.C.1. Indoor Stabilization Building Design and Construction

- XI.C.1.a. The Indoor Stabilization Building includes two (2) Mixing Bin Tanks, and the building shall be equipped with air pollution control equipment to control particulate emissions.
- XI.C.1.b. The maximum waste processing rate for the Indoor Stabilization Building shall not exceed 300 tons of waste per hour based on a daily average, nor exceed 2,628,000 tons of waste per year.

XI.C.2. Indoor Stabilization Building Operation

- XI.C.2.a. The Permittee may conduct stabilization, microencapsulation, macroencapsulation, and size reduction within the Indoor Stabilization Building.
- XI.C.2.b. The Permittee shall follow, as appropriate, the operating procedures for stabilization, microencapsulation, macroencapsulation, and size reduction as provided in Attachments 2, 4, 6, 7, 13, 24, and 25 of this Permit and as provided by Permit Conditions X.B and XI.B.2.
- XI.C.2.c. The Permittee shall operate each mixing bin tank so as not to exceed the maximum capacity of 120 cubic yards.

- XI.C.2.d. The Permittee shall manage non-containerized waste in the Indoor Stabilization Building such that the height and location of the waste does not allow these materials to overflow any mixing bin tank.
- XI.C.2.e. In the event of a power outage, or other event that reduces the required operating efficiency of the air pollution control equipment, the Permittee shall cease all unloading and treatment operations of "fine wastes" until such time as the power is restored or the air pollution control equipment is returned to normal operation. Other treatment and storage operations not involving "fine wastes" may continue.
- XI.C.2.f. The Permittee shall maintain and operate the air pollution control equipment, provided in Attachment 24 of this Permit, in accordance with the manufacturers' instructions and/or specifications, and shall keep these on-site.

XI.D. CLOSURE AND POST-CLOSURE

Closure and Post-Closure Care of the Indoor Stabilization Building and Stabilization Facility, and associated equipment, shall be completed in accordance with IDAPA 58.01.05.008 [40 CFR 264 Subpart G] and all applicable sections of Attachment 9 of this Permit.

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EFFECTIVE DATE: July 28, 2016
MODIFICATION DATE: November 01, 2019

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MODULE XII - RESERVED

MODULE XIII – CORRECTIVE ACTION

XIII.A. SOLID WASTE MANAGEMENT UNITS

- XIII.A.1. The Director may require corrective action, as specified in the following permit conditions for any newly identified Solid Waste Management Units (SWMUs), where newly identified SWMUs are those not documented in the facility Administrative Record, maintained by the Department, as having undergone corrective action.
- XIII.A.2. The Permittee shall conduct a corrective action investigation, in accordance with Permit Conditions XIII.B through XIII.H of this Permit, for each newly identified SWMU.

XIII.B. STANDARD CONDITIONS

- XIII.B.1. Failure to submit the information required by the permit conditions within Module XIII of this Permit, or falsification of any submitted information, is grounds for termination of this Permit in accordance with IDAPA 58.01.05.012 [40 CFR 270.43], and for an enforcement action pursuant to Permit Condition I.C of this Permit.
- XIII.B.2. All plans, reports, notifications, and other submissions to the Director, as required by the permit conditions within Module XIII of this Permit, shall be signed and certified in accordance with Permit Condition I.R of this Permit.
- XIII.B.3. The Permittee shall submit to the Director (by certified mail, express mail, or hand delivered to the address specified in Permit Condition I.Z of this Permit) a minimum of two (2) hard copies and one electronic copy of each plan, report, notification, or other submissions required by the permit conditions within Module XIII of this Permit.
- XIII.B.4. All plans and schedules, as required by the permit conditions in Module XIII of this Permit (upon written approval from the Director) shall be incorporated into Module XIII of this Permit, in accordance with Permit Condition XIII.H of this Permit. Any noncompliance with such approved plans and schedules shall be deemed noncompliance with this Permit.
- XIII.B.5. The Permittee shall only receive extension(s) of the specified Compliance Schedule due date(s) for the submittal(s), required by the permit conditions within Module XIII of this Permit, upon written approval from the Director, in accordance with Permit Condition XIII.H of this Permit.
- XIII.B.6. If the Director determines that further actions beyond those provided by the permit conditions within Module XIII of this Permit, or changes to permit conditions stated herein, are warranted, the Director shall modify the permit condition in Module XIII, in accordance with Permit Condition XIII.H of this Permit.
- XIII.B.7. All raw data (such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken, pursuant to the permit conditions in Module XIII of this Permit) shall be maintained at the facility during the effective term of this Permit.

XIII.C. NOTIFICATION REQUIREMENTS & ASSESSMENT OF NEWLY-IDENTIFIED SWMUs

- XIII.C.1. The Permittee shall notify the Director in writing (by certified mail, express mail, or hand delivery) of any newly identified SWMU(s). The Permittee shall submit written notification within thirty (30) calendar days of discovering the SWMU(s). The notification shall include the location of the new SWMU(s) and information on the suspected or known wastes at the site.
- XIII.C.2. Within one hundred fifty (150) calendar days following discovery of the SWMU(s), the Permittee shall submit to the Director (by certified mail, electronic submittal, or hand delivery) a SWMU Assessment Plan.
- XIII.C.3. The SWMU Assessment Plan shall include the information or the means by which the following information will be obtained:
- XIII.C.3.a. Information concerning past and present operations at the unit(s); and
- XIII.C.3.b. Any ground water, surface water, soil (surface or subsurface strata), or air sampling and analysis data needed to determine whether a release of hazardous waste and/or hazardous waste constituent(s) from such unit(s) has occurred, is occurring, or is likely to occur. The SWMU Assessment Plan shall demonstrate that the Sampling and Analysis Program (if applicable) is capable of yielding representative samples, and must include parameters sufficient to identify migration of hazardous waste and/or hazardous waste constituent(s) from the newly discovered SWMUs to the environment.
- XIII.C.4. The Permittee shall receive written approval from the Director for the SWMU Assessment Plan; or
- XIII.C.5. The Permittee shall receive written notice from the Director of the SWMU Assessment Plan's deficiencies, and the written notice will specify a due date for submittal of a revised Assessment Plan; or
- XIII.C.6. The Permittee shall receive written notice from the Director of the revisions incorporated, by the Director, in the SWMU Assessment Plan. The revised Assessment Plan shall become the approved SWMU Assessment Plan.
- XIII.C.7. The SWMU Assessment Plan, as approved by the Director and as specified in Permit Conditions XIII.C.4, XIII.C.5, or XIII.C.6 of this Permit, shall be incorporated within Module V of this Permit, in accordance with Permit Condition XIII.H of this Permit. The Permittee shall be notified in writing of the approval of the permit modification.
- XIII.C.8. The Permittee shall implement the approved SWMU Assessment Plan within thirty (30) calendar days of receiving written notice of the permit modification approval, specified in Permit Condition XIII.C.7 of this Permit.
- XIII.C.9. The SWMU Assessment Plan shall contain a schedule, including the submission date for a SWMU Assessment Report.
- XIII.C.10. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. At a minimum, the report shall provide the following information for each newly identified SWMU:

- XIII.C.10.a. The SWMU location, identified on a map;
 - XIII.C.10.b. The type and function of the unit, including general dimensions and a structural description;
 - XIII.C.10.c. The period during which the unit was operated; and
 - XIII.C.10.d. All wastes that were or are being managed at the SWMU, including results of any sampling and analysis used to determine whether releases of hazardous wastes and/or hazardous waste constituent(s) have occurred, are occurring, or are likely to occur from the unit.
- XIII.C.11. Based on the results of SWMU Assessment Report, the Director shall determine the need for further investigations at specific unit(s) included in the SWMU assessment. If the Director determines that such investigations are needed, the Director will require the Permittee to prepare a plan for such investigations. This plan shall be reviewed for approval in accordance with the requirements of Permit Condition XIII.D of this Permit.
- XIII.C.12. The Permittee shall notify the Director (in writing by certified mail, express mail, electronic submittal, or hand delivery) of any release(s) of hazardous waste and hazardous waste constituent(s) discovered during the course of ground water monitoring, field investigation, environmental auditing, or other activities undertaken during the RCRA Facility Investigation (RFI) and Permit Condition XIII.D of this Permit. The written notification shall be received by the Director no later than fifteen (15) calendar days after discovery. Such releases may be from already documented or newly identified units. The Director may require further investigation of the new releases. Further investigation, if required, shall be performed in accordance with the requirements of Permit Condition XIII.D of this Permit.

XIII.D. RCRA FACILITY INVESTIGATION (RFI)

- XIII.D.1. The Permittee shall conduct a RFI, as deemed necessary by the Director, to determine the nature and extent of known and suspected releases of hazardous wastes and/or hazardous waste constituent(s) from each SWMU at the facility, identified in accordance with Permit Condition XIII.C of this Permit, and to gather data to support a Corrective Measures Study. The Permittee shall conduct the RFI in accordance with an approved Work Plan, completed in accordance with current guidance documents from EPA (*RCRA Facility Investigation Guidance, Volumes I through IV*, or equivalent).
- XIII.D.2. The Permittee shall conduct the RFI for each newly identified SWMU, in accordance with the schedule specified in Table XIII-1 of this Permit.
- XIII.D.3. The RFI Compliance Schedules, specified in Table XIII-1 of this Permit, may be modified in accordance with Permit Condition XIII.H of this Permit.

XIII.E. INTERIM MEASURES

- XIII.E.1. If, during the course of any activity initiated in compliance with the permit conditions of Module XIII of this Permit, the Director determines that a release or potential release of hazardous waste and/or hazardous waste constituent(s) from a SWMU

poses a threat to human health or the environment, the Director may require the Permittee to perform specific interim measures.

- XIII.E.2. The Director shall notify the Permittee in writing of the requirement to perform the interim measures specified in the Interim Measures Plan, in accordance with Permit Condition XIII.E.3 of this Permit. The Permittee shall comply with the specified Interim Measures Plan alternative (Permit Condition XIII.E.3.a or XIII.E.3.b of this Permit) designated in the written notification.
- XIII.E.3. The Permittee shall perform the requirements of the Interim Measures Plan, in accordance with the alternative specified in either Permit Condition XIII.E.3.a or XIII.E.3.b of this Permit.
- XIII.E.3.a. The Director shall determine specific actions to implement the interim measures. The Director shall provide an Interim Measures Plan with the written notification specified in Permit Condition XIII.E.2 of this Permit; or
- XIII.E.3.b. Within thirty (30) calendar days of receiving the written notification requiring the Interim Measures Plan, as specified in Permit Condition XIII.E.2 of this Permit, the Permittee shall provide (by certified mail, express mail, electronic submittal, or hand delivery) the Interim Measures Plan to the Director for approval.
- XIII.E.4. The Interim Measures Plan shall identify specific action(s) to be taken to implement the interim measures and a schedule for implementing the required measures. At a minimum, the Interim Measures Plan shall consider (but not be limited to) the following factors:
- XIII.E.4.a. Time required to develop and implement a final remedy;
- XIII.E.4.b. Actual and potential exposure of human and environmental receptors;
- XIII.E.4.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;
- XIII.E.4.d. The potential for further degradation of the medium absent of interim measures;
- XIII.E.4.e. Presence of hazardous waste in containers that may pose a threat of release;
- XIII.E.4.f. Presence and concentration of hazardous waste, including hazardous waste constituent(s) in solids that have the potential to migrate to ground water or surface water;
- XIII.E.4.g. Weather conditions that may affect the current levels of contamination;
- XIII.E.4.h. Risks of fire, explosion, or accident; and
- XIII.E.4.i. Other situations that may pose threats to human health and the environment.
- XIII.E.5. The Interim Measures Plan shall be incorporated into this Permit, in accordance with Permit Condition XIII.H of this Permit.
- XIII.F. CORRECTIVE MEASURES STUDY AND IMPLEMENTATION

- XIII.F.1. Based on the results of the RFI, the Permittee shall identify, screen, and develop the alternative or alternatives for removal, containment, treatment and/or other remediation of the contamination. The Permittee shall conduct the Corrective Measures Study in accordance with an approved Work Plan, completed in accordance with current guidance documents from EPA (*RCRA Corrective Action Interim Measures Guidance – Interim Final, RCRA Facility Investigation Guidance, Volumes I through IV*, or equivalent).
- XIII.F.2. Upon the Director's approval of the Corrective Measures Study, pursuant to Permit Condition XIII.F.1 of this Permit, the Permittee shall prepare and submit to the Director for approval (by certified mail, express mail, or hand delivery), the Corrective Measures Implementation Program Plan, in accordance with an approved Work Plan.
- XIII.F.3. Upon the Director's approval of the Corrective Measures Implementation Program Plan, pursuant to Permit Condition XIII.F.2 of this Permit, the Permittee shall conduct the Corrective Measures Implementation Program Plan, in accordance with the approved Work Plan for the corrective measures design and construction.
- XIII.F.4. The Permittee shall conduct the Corrective Measures Study and prepare the Corrective Measures Implementation Program Plan, as specified in Permit Conditions XIII.F.1 and XIII.F.2 of this Permit, in accordance with the schedule specified in Table XIII-2.
- XIII.F.5. The Permittee shall prepare and submit to the Director for approval a Compliance Schedule for conducting the Corrective Measures Implementation Program Plan, as required by Permit Condition XIII.F.3 of this Permit.
- XIII.F.5.a. The Permittee shall provide a justification for each compliance date in the Compliance Schedule, based on the complexity of the Corrective Measures Implementation Program Plan, and reasonable contract and administrative time requirements.
- XIII.F.5.b. On or before the compliance date for submittal of the draft Corrective Measures Implementation Program Plan specified in Table XIII-2 of this Permit, the Permittee shall submit to the Director for approval (by certified mail, express mail, electronic submittal, or hand delivery) the Compliance Schedule and subsequent justification, pursuant to Permit Condition XIII.F.5 of this Permit,.
- XIII.F.5.c. Upon the Director's approval of the Corrective Measures Implementation Program Plan Compliance Schedule, the Compliance Schedule shall be incorporated into this Permit concurrently with the final Corrective Measures Implementation Program Plan, in accordance with IDAPA 58.01.05.012 [40 CFR 270.41 and 270.42].
- XIII.F.6. The Permittee shall conduct the Corrective Measures Implementation, as specified in Permit Condition XIII.F.3 of this Permit, in accordance with Permit Condition XIII.F.5 of this Permit.
- XIII.F.7. The Corrective Measures Study and Corrective Measures Implementation Compliance Schedules, specified in Table XIII-2 of this Permit, shall be modified in accordance with Permit Condition XIII.H of this Permit.

XIII.G. REPORTING REQUIREMENTS

- XIII.G.1. The Permittee shall submit to the Director signed quarterly progress reports of all activities (i.e., SWMU Assessments, Interim Measures, RFIs, and/or Corrective Measures Studies) conducted, pursuant to the permit conditions of Module V of this Permit. The Permittee shall initially submit the quarterly progress reports no later than ninety (90) calendar days after being notified in writing that the approved SWMU Assessment Plan has been incorporated within Module XIII of this Permit, through a permit modification, in accordance with Permit Condition XIII.H of this Permit.
- XIII.G.2. At a minimum, the quarterly progress reports shall contain the following:
- XIII.G.2.a. A description of the work completed;
 - XIII.G.2.b. Summaries of all findings and all raw data;
 - XIII.G.2.c. Summaries of all problems or potential problems encountered during the reporting period, and actions taken or to be taken to rectify the problems; and
 - XIII.G.2.d. Projected work for the next reporting period.
- XIII.G.3. The Permittee shall maintain copies of other reports, drilling logs, etc. at the facility during the effective period of this Permit. The Permittee shall provide copies of the said reports, logs, etc. to the Director upon request.
- XIII.G.4. As specified under Permit Condition XIII.B.5 of this Permit, the Director may require the Permittee to conduct new or more extensive assessments, investigations, or studies (as needed) based on information provided in these progress reports or other supporting information.

XIII.H. MODIFICATION OF THE CORRECTIVE ACTION SCHEDULE OF COMPLIANCE

- XIII.H.1. Requests for modifications of the final compliance dates, pursuant to the permit conditions in Module XIII of this Permit, shall be submitted to the Director for approval, in accordance with IDAPA 58.01.05.012 [40 CFR 270.41 and 270.42]. The Corrective Action Schedule of Compliance (final compliance dates), subject to modification, includes the following:
- XIII.H.1.a. The compliance date(s), as specified in Table XIII-1 of this Permit, for submittal of the RFI Final Report;
 - XIII.H.1.b. The compliance date(s), as specified in Table XIII-2 of this Permit, for submittal of the Corrective Measures Study Report;
 - XIII.H.1.c. The compliance date(s), as specified in Table XIII-2 of this Permit, for submittal of the final Corrective Measures Implementation Program Plan, in accordance with Permit Condition XIII.F.2 of this Permit,

- XIII.H.1.d. Once established in accordance with Permit Condition XIII.F.5 of this Permit, the compliance date(s) for submittal of the corrective measures final (100% completion) Design and Construction Plans, in accordance with Permit Condition XIII.F.3 of this Permit;
- XIII.H.1.e. Compliance dates, as specified in Tables XIII-1 and XIII-2 of this Permit, for implementing the approved plans and/or reports; and
- XIII.H.1.f. Compliance dates for quarterly submittal of progress reports.
- XIII.H.2. Pursuant to IDAPA 58.01.05.012 [40 CFR 270.42(a)], the Compliance Schedules, specified by the Director, shall be modified if the Director determines that good cause exists for which the Permittee had no control, and for which there is no reasonable available remedy.
- XIII.H.3. If adequate funds for Corrective Measures Implementation are not available, the Director and the Department reserve the right to pursue any actions deemed necessary to protect human health and the environment, not excluding judicial recourse or termination of this Permit.
- XIII.H.4. The Permittee shall submit to the Director for approval a request for modifications of the interim compliance dates that do not affect the final compliance dates. If the Director approves the interim compliance date modifications, Tables XIII-1 and/or XIII-2 of this Permit shall incorporate the modified compliance dates as approved, and such change shall not be considered a permit modification under IDAPA 58.01.05.012 [40 CFR 270.41].

TABLE XIII-1. RCRA FACILITY INVESTIGATION (RFI) COMPLIANCE SCHEDULE FOR NEWLY IDENTIFIED SOLID WASTE MANAGEMENT UNITS (SWMUs)	
RFI ACTIVITY	DUE DATE
Submit Draft RFI-Phase II (Task II & III) Work Plan and Schedule	Within ninety (90) calendar days of the Director's notification that an RFI is needed, in accordance with Permit Condition XIII.C.11 of this Permit.
Initiate RFI-Phase II (Task II & III) Activities	Within forty-five (45) calendar days of the Director's approval of the Task II and III Work Plan and Schedule.
Submit Task IV Draft Report	As specified in the Director's approved RFI-Phase II (Task II & III) Work Plan and Schedule.
Submit Task IV Final & Summary Reports	As specified in the Director's approved RFI-Phase II (Task II & III) Work Plan and Schedule.
Progress Reports on Tasks II through IV	Quarterly (every 90 days) beginning ninety (90) calendar days after the Director's approved RFI-Phase II (Task II & III) activities.

**TABLE XIII-2. CORRECTIVE MEASURES STUDY AND IMPLEMENTATION COMPLIANCE SCHEDULE
 SOLID WASTE MANAGEMENT UNITS (SWMUs)**

CMS SUBMISSION/CMI SUBMISSION	DUE DATES
Submit CMS Work Plan (Appendix B, Task I & II)	Within sixty (60) calendar days of the RFI Final Report.
Submit Draft CMS Report (Appendix B, Task I, II & III)	Within three hundred (300) calendar days of the Director's approval of the CMS Work Plan.
Submit Final CMS Report (Appendix B, Task I, II & III)	Within sixty (60) calendar days of receiving the Director's comments on the Draft CMS Report.
Submit Draft CMS Program Plan (Appendix B, Task IV)	Within ninety (90) calendar days of the Director's approval of the Final CMS Report.
Submit Final CMS Program Plan (Appendix B, Task IV)	Within sixty (60) calendar days of receiving the Director's comments on the Draft CMI Program Plan.
Submit Corrective Measures Design Preliminary Design Approximately 30% Complete	As specified in the Director's approved CMI Program Plan.
Submit Corrective Measures Design Preliminary Design Approximately 60% Complete	As specified in the Director's approved CMI Program Plan.
Submit Corrective Measures Design Preliminary Design Approximately 95% Complete	As specified in the Director's approved CMI Program Plan.
Submit Final Corrective Measures Design	As specified in the Director's approved CMI Program Plan.
Progress Reports on Appendix B, Tasks I through IV	Quarterly, every ninety (90) calendar days, beginning 90 calendar days after the Director's approval of the Final RFI Report.
Submit Draft CQA Program Plan	As specified in the Director's approved CMI Program Plan.
Submit Final CQA Program Plan	Within sixty (60) calendar days of the Director's approval of the Draft CQA.
Construction of Corrective Measures	Within sixty (60) calendar days of the Director's approval of the Final CQA.
Pre-Final Inspection	Forty-five (45) calendar days following report of pre-final inspection.
Corrective Measures Construction Report	Within ninety (90) calendar days following completion of construction.
Corrective Measures Implementation Quarterly Progress Reports	Quarterly, every ninety (90) calendar days, beginning 90 calendar days after the Director's approval of the Final RFI Report.

EFFECTIVE DATE: July 28, 2016

US ECOLOGY OF IDAHO
PERMIT NUMBER: IDD073114654
FIGURES Page 90 of 92

FIGURES

EFFECTIVE DATE: July 28, 2016
MODIFICATION DATE: November 18, 2017

US ECOLOGY OF IDAHO
PERMIT NUMBER: IDD073114654
FIGURES Page 91 of 92

[Place figure here]

Figure 1. Ground Water Monitoring Well Network for Upper Aquifer.

EFFECTIVE DATE: July 28, 2016
MODIFICATION DATE: November 18, 2017

US ECOLOGY OF IDAHO
PERMIT NUMBER: IDD073114654
FIGURES Page 92 of 92

[Place figure here]

Figure 2. Ground Water Monitoring Well Network for Lower Aquifer

WM Arlington Draft Reference Profiles



Requested Facility: Chemical Waste Management (Hazardous Waste Facility) Unsure Profile Number: OR344979
 Multiple Generator Locations (Attach Locations) Request Certificate of Disposal Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- 1. Generator Name: Pasco Landfill NPL Site
- 2. Site Address: Kahlotus Road and Hwy12
(City, State, ZIP) Pasco WA 99301
- 3. County: Franklin
- 4. Contact Name: _____
- 5. Email: _____
- 6. Phone: _____ 7. Fax: _____
- 8. Generator EPA ID: WAD991281874 N/A
- 9. State ID: _____ N/A

C. MATERIAL INFORMATION

- 1. Common Name: miw < nDDH C < dH
Describe Process Generating Material: See Attached

Pasco Landfill, Zone A drum removal. Drums/Bulk with D002 characteristic for neutralization and landfill, possible D004-D043 D codes not needing treatment under CAMU. Drums/Bulk are separated by physical properties, then haz cat in field
- 2. Material Composition and Contaminants: See Attached

1.	5-100 %
2.	0-5 %
3.	0-49 ppm
4.	

Total comp. must be equal to or greater than 100% ≥100%
- 3. State Waste Codes: _____ N/A
- 4. Color: various
- 5. Physical State at 70°F: Solid Liquid Other: Sludge
- 6. Free Liquid Range Percentage: 5 to 100 N/A
- 7. pH: 0 to 2 N/A
- 8. Strong Odor: Yes No Describe: _____
- 9. Flash Point: <140°F 140°-199°F ≥200° N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- 1. Analytical attached Yes
Please identify applicable samples and/or lab reports:
- 2. Other information attached (such as MSDS)? Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): _____ Date: _____
Title: _____
Company: _____

THINK GREEN.®

B. BILLING INFORMATION

SAME AS GENERATOR

- 1. Billing Name: IWAG
- 2. Billing Address: _____
(City, State, ZIP) _____
- 3. Contact Name: _____
- 4. Email: _____
- 5. Phone: _____ 6. Fax: _____
- 7. WM Hauled? Yes No
- 8. P.O. Number: _____
- 9. Payment Method: Credit Account Cash Credit Card

D. REGULATORY INFORMATION

- 1. EPA Hazardous Waste? Yes* No
Code: _____
- 2. State Hazardous Waste? Yes No
Code: miw o nDDH< nDDM>nDML
- 3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? Yes* No
- 4. Contains Underlying Hazardous Constituents? Yes* No
- 5. From an industry regulated under Benzene NESHAP? Yes* No
- 6. Facility remediation subject to 40 CFR 63 GGGGG? Yes* No
- 7. CERCLA or State-mandated clean-up? Yes* No
- 8. NRC or State-regulated radioactive or NORM waste? Yes* No
***If Yes, see Addendum (page 2) for additional questions and space.**
- 9. Contains PCBs? → If Yes, answer a, b and c. Yes No
 - a. Regulated by 40 CFR 761? Yes No
 - b. Remediation under 40 CFR 761.61 (a)? Yes No
 - c. Were PCB imported into the US? Yes No
- 10. Regulated and/or Untreated Medical/Infectious Waste? Yes No
- 11. Contains Asbestos? Yes No
→ If Yes: Non-Friable Non-Friable - Regulated Friable

F. SHIPPING AND DOT INFORMATION

- 1. One-Time Event Repeat Event/Ongoing Business
- 2. Estimated Quantity/Unit of Measure: 20000
 Tons Yards Drums Gallons Other: drums/bulk
- 3. Container Type and Size: 55G/Roll offs
- 4. USDOT Proper Shipping Name: _____ N/A
RQ, UN3264, WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S MIXTURE, 8, PG II

Certification Signature



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: OR344979

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1): _____ If more space is needed, please attach additional pages.

and separated by chemical properties. . material composition and contaminants may vary for each load, but will fall into the above parameters.

Material Composition and Contaminants (Continued from page 1): _____ If more space is needed, please attach additional pages.

5.	
6.	
7.	
8.	
9.	
Total composition must be equal to or greater than 100%	≥100%

D. REGULATORY INFORMATION

Only questions with a “Yes” response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)? Yes No

c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? → If Yes, complete question 4. Yes No

d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)? Yes No

→ If Yes, please check **one** of the following:

Waste meets LDR or treatment exemptions for organics (40 CFR 264.1082(c)(2) or (c)(4))

Waste contains VOCs that average <500 ppmw (CFR 264.1082(c)(1)) – will require annual update.

2. State Hazardous Waste → Please list all state waste codes: _____

3. For material that is Treated, Delisted, or Excluded → Please indicate the category, below:

Delisted Hazardous Waste Excluded Waste under 40 CFR 261.4 → Specify Exclusion: _____

Treated Hazardous Waste Debris Treated Characteristic Hazardous Waste → If checked, complete question 4.

4. Underlying Hazardous Constituents → Please list all Underlying Hazardous Constituents:

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.

a. Are you a TSDF? → If yes, please complete Benzene NESHAP questionnaire. If not, continue. Yes No

b. Does this material contain benzene? Yes No

1. If yes, what is the flow weighted average concentration? _____ ppmw

c. What is your facility's current total annual benzene quantity in Megagrams? <1 Mg 1–9.99 Mg ≥10 Mg

d. Is this waste soil from a remediation? Yes No

1. If yes, what is the benzene concentration in remediation waste? _____ ppmw

e. Does the waste contain >10% water/moisture? Yes No

f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw? Yes No

g. Is material exempt from controls in accordance with 40 CFR 61.342? Yes No

→ If yes, specify exemption: _____

h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF? Yes No

6. 40 CFR 63 GGGGG → Does the material contain <500 ppmw VOHAPs at the point of determination? Yes No

7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal. A “Determination of Acceptability” may be needed for CERCLA wastes not going to a CERCLA approved facility.

8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes and pCi/g: _____



Requested Facility: Chemical Waste Management (Hazardous Waste Facility) Unsure Profile Number: OR344980
 Multiple Generator Locations (Attach Locations) Request Certificate of Disposal Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- 1. Generator Name: Pasco Landfill NPL Site
- 2. Site Address: Kahlotus Road and Hwy12
(City, State, ZIP) Pasco WA 99301
- 3. County: Franklin
- 4. Contact Name: _____
- 5. Email: _____
- 6. Phone: _____ 7. Fax: _____
- 8. Generator EPA ID: WAD991281874 N/A
- 9. State ID: _____ N/A

C. MATERIAL INFORMATION

- 1. Common Name: miw < nDDH C < FEHAS
Describe Process Generating Material: See Attached

Pasco Landfill, Zone A drum removal. Drums/Bulk with D002 characteristic for neutralization and landfill, possible D004-D043 D codes not needing treatment under CAMU. Drums/Bulk are separated by physical properties, then haz cat in field
- 2. Material Composition and Contaminants: See Attached

1.	5-100 %
2.	0-5 %
3.	0-49 ppm
4.	

Total comp. must be equal to or greater than 100% ≥100%
- 3. State Waste Codes: _____ N/A
- 4. Color: various
- 5. Physical State at 70°F: Solid Liquid Other: Sludge
- 6. Free Liquid Range Percentage: 5 to 100 N/A
- 7. pH: 12.5 to 14 N/A
- 8. Strong Odor: Yes No Describe: _____
- 9. Flash Point: <140°F 140°-199°F ≥200° N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- 1. Analytical attached Yes
Please identify applicable samples and/or lab reports:
- 2. Other information attached (such as MSDS)? Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): _____ Date: _____
Title: _____
Company: _____

THINK GREEN.®

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Revised June 30, 2015 ©2015 Waste Management

B. BILLING INFORMATION

SAME AS GENERATOR

- 1. Billing Name: IWAG
- 2. Billing Address: _____
(City, State, ZIP) _____
- 3. Contact Name: _____
- 4. Email: _____
- 5. Phone: _____ 6. Fax: _____
- 7. WM Hauled? Yes No
- 8. P.O. Number: _____
- 9. Payment Method: Credit Account Cash Credit Card

D. REGULATORY INFORMATION

- 1. EPA Hazardous Waste? Yes* No
Code: _____
- 2. State Hazardous Waste? Yes No
Code: miw o nDDH< nDDM>nDML
- 3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? Yes* No
- 4. Contains Underlying Hazardous Constituents? Yes* No
- 5. From an industry regulated under Benzene NESHAP? Yes* No
- 6. Facility remediation subject to 40 CFR 63 GGGGG? Yes* No
- 7. CERCLA or State-mandated clean-up? Yes* No
- 8. NRC or State-regulated radioactive or NORM waste? Yes* No
***If Yes, see Addendum (page 2) for additional questions and space.**
- 9. Contains PCBs? → If Yes, answer a, b and c. Yes No
 - a. Regulated by 40 CFR 761? Yes No
 - b. Remediation under 40 CFR 761.61 (a)? Yes No
 - c. Were PCB imported into the US? Yes No
- 10. Regulated and/or Untreated Medical/Infectious Waste? Yes No
- 11. Contains Asbestos? Yes No
→ If Yes: Non-Friable Non-Friable - Regulated Friable

F. SHIPPING AND DOT INFORMATION

- 1. One-Time Event Repeat Event/Ongoing Business
- 2. Estimated Quantity/Unit of Measure: 20000
 Tons Yards Drums Gallons Other: _____
- 3. Container Type and Size: drums or bulk
- 4. USDOT Proper Shipping Name: _____ N/A
RQ, UN3266, WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. MIXTURE, 8, PG II

Certification Signature



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: OR344980

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1): If more space is needed, please attach additional pages.
 and separated by chemical properties. . material composition and contaminants may vary for each load, but will fall into the above parameters.

Material Composition and Contaminants (Continued from page 1):	If more space is needed, please attach additional pages.
5.	
6.	
7.	
8.	
9.	
Total composition must be equal to or greater than 100%	≥100%

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

- b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)? Yes No
- c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? → If Yes, complete question 4. Yes No
- d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)? Yes No
 → If Yes, please check **one** of the following:
 - Waste meets LDR or treatment exemptions for organics (40 CFR 264.1082(c)(2) or (c)(4))
 - Waste contains VOCs that average <500 ppmw (CFR 264.1082(c)(1)) – will require annual update.

2. State Hazardous Waste → Please list all state waste codes: _____

3. For material that is Treated, Delisted, or Excluded → Please indicate the category, below:
 Delisted Hazardous Waste Excluded Waste under 40 CFR 261.4 → Specify Exclusion: _____
 Treated Hazardous Waste Debris Treated Characteristic Hazardous Waste → If checked, complete question 4.

4. Underlying Hazardous Constituents → Please list all Underlying Hazardous Constituents:

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.

- a. Are you a TSDF? → If yes, please complete Benzene NESHAP questionnaire. If not, continue. Yes No
- b. Does this material contain benzene? Yes No
 1. If yes, what is the flow weighted average concentration? _____ ppmw
- c. What is your facility's current total annual benzene quantity in Megagrams? <1 Mg 1–9.99 Mg ≥10 Mg
- d. Is this waste soil from a remediation? Yes No
 1. If yes, what is the benzene concentration in remediation waste? _____ ppmw
- e. Does the waste contain >10% water/moisture? Yes No
- f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw? Yes No
- g. Is material exempt from controls in accordance with 40 CFR 61.342? Yes No
 → If yes, specify exemption: _____
- h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF? Yes No

6. 40 CFR 63 GGGGG → Does the material contain <500 ppmw VOHAPs at the point of determination? Yes No

7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal. A "Determination of Acceptability" may be needed for CERCLA wastes not going to a CERCLA approved facility.

8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes and pCi/g: _____



Requested Facility: Chemical Waste Management (Hazardous Waste Facility) Unsure Profile Number: OR344981
 Multiple Generator Locations (Attach Locations) Request Certificate of Disposal Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- 1. Generator Name: Pasco Landfill NPL Site
- 2. Site Address: Kahlolus Road and Hwy12
(City, State, ZIP) Pasco WA 99301
- 3. County: Franklin
- 4. Contact Name: _____
- 5. Email: _____
- 6. Phone: _____ 7. Fax: _____
- 8. Generator EPA ID: WAD991281874 N/A
- 9. State ID: _____ N/A

C. MATERIAL INFORMATION

- 1. Common Name: miw < nDDM>nDML<nDDL C vC
Describe Process Generating Material: See Attached

Pasco Landfill, Zone A drum removal. Drums/Bulk with possible D004-D043 for solidification potentially containing D003 sulfur or cyanide bearing waste. Not needing treatment under CAMU. Drums/Bulk are separated by physical properties, then
- 2. Material Composition and Contaminants: See Attached

1.	5-100 %
2.	0-5 %
3.	0-49 ppm
4. c	0-5 %

Total comp. must be equal to or greater than 100% ≥100%
- 3. State Waste Codes: _____ N/A
- 4. Color: various
- 5. Physical State at 70°F: Solid Liquid Other: Sludge
- 6. Free Liquid Range Percentage: 5 to 100 N/A
- 7. pH: 3 to 12 N/A
- 8. Strong Odor: Yes No Describe: _____
- 9. Flash Point: <140°F 140°-199°F ≥200° N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- 1. Analytical attached Yes
Please identify applicable samples and/or lab reports:
- 2. Other information attached (such as MSDS)? Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): _____ Date: _____
Title: _____
Company: _____

THINK GREEN.®

B. BILLING INFORMATION

SAME AS GENERATOR

- 1. Billing Name: IWAG
- 2. Billing Address: _____
(City, State, ZIP) _____
- 3. Contact Name: _____
- 4. Email: _____
- 5. Phone: _____ 6. Fax: _____
- 7. WM Hauled? Yes No
- 8. P.O. Number: _____
- 9. Payment Method: Credit Account Cash Credit Card

D. REGULATORY INFORMATION

- 1. EPA Hazardous Waste? Yes* No
Code: _____
- 2. State Hazardous Waste? Yes No
Code: miw o < _____ nDDL
- 3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? Yes* No
- 4. Contains Underlying Hazardous Constituents? Yes* No
- 5. From an industry regulated under Benzene NESHAP? Yes* No
- 6. Facility remediation subject to 40 CFR 63 GGGGG? Yes* No
- 7. CERCLA or State-mandated clean-up? Yes* No
- 8. NRC or State-regulated radioactive or NORM waste? Yes* No
***If Yes, see Addendum (page 2) for additional questions and space.**
- 9. Contains PCBs? → If Yes, answer a, b and c. Yes No
 - a. Regulated by 40 CFR 761? Yes No
 - b. Remediation under 40 CFR 761.61 (a)? Yes No
 - c. Were PCB imported into the US? Yes No
- 10. Regulated and/or Untreated Medical/Infectious Waste? Yes No
- 11. Contains Asbestos? Yes No
→ If Yes: Non-Friable Non-Friable - Regulated Friable

F. SHIPPING AND DOT INFORMATION

- 1. One-Time Event Repeat Event/Ongoing Business
- 2. Estimated Quantity/Unit of Measure: 20000
 Tons Yards Drums Gallons Other: drums/bulk
- 3. Container Type and Size: drums/roll off
- 4. USDOT Proper Shipping Name: _____ N/A
RQ, UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S, 9, PG III

Certification Signature



Requested Facility: Chemical Waste Management (Hazardous Waste Facility) [] Unsure Profile Number: OR344989
[] Multiple Generator Locations (Attach Locations) [] Request Certificate of Disposal [] Renewal? Original Profile Number:

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- 1. Generator Name: Pasco Landfill NPL Site
2. Site Address: Kahlotus Road and Hwy12 (City, State, ZIP) Pasco WA 99301
3. County: Franklin
4. Contact Name:
5. Email:
6. Phone: 7. Fax:
8. Generator EPA ID: WAD991281874 [] N/A
9. State ID: [] N/A

C. MATERIAL INFORMATION

- 1. Common Name: miw < nDDM>nDML < Describe Process Generating Material: [] See Attached
Pasco Landfill, Zone A drum removal. Drums/Bulk with possible D004-D043, direct landfill. Not needing treatment under CAMU. Drums/Bulk are separated by physical properties, then haz cat in field and separated by chemical
2. Material Composition and Contaminants: [] See Attached
Table with 4 rows: 1. < < dUD 5-100 %, 2. n 5-100 %, 3. 0-49 ppm, 4. m 0-5 %
Total comp. must be equal to or greater than 100% ≥100%
3. State Waste Codes: [] N/A
4. Color: various
5. Physical State at 70°F: [x] Solid [] Liquid [] Other:
6. Free Liquid Range Percentage: to [x] N/A
7. pH: to [x] N/A
8. Strong Odor: [] Yes [x] No Describe:
9. Flash Point: [] <140°F [] 140°-199°F [x] ≥200° [x] N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- 1. Analytical attached [] Yes
Please identify applicable samples and/or lab reports:
2. Other information attached (such as MSDS)? [] Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided.

[] I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): Date:
Title:
Company:

B. BILLING INFORMATION

[] SAME AS GENERATOR

- 1. Billing Name: IWAG
2. Billing Address: (City, State, ZIP)
3. Contact Name:
4. Email:
5. Phone: 6. Fax:
7. WM Hauled? [] Yes [] No
8. P.O. Number:
9. Payment Method: [] Credit Account [] Cash [] Credit Card

D. REGULATORY INFORMATION

- 1. EPA Hazardous Waste? [] Yes* [x] No Code:
2. State Hazardous Waste? [x] Yes [] No Code: miw o < nDDM>nDML <
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? [x] Yes* [] No
4. Contains Underlying Hazardous Constituents? [] Yes* [x] No
5. From an industry regulated under Benzene NESHAP? [] Yes* [x] No
6. Facility remediation subject to 40 CFR 63 GGGGG? [] Yes* [x] No
7. CERCLA or State-mandated clean-up? [] Yes* [x] No
8. NRC or State-regulated radioactive or NORM waste? [] Yes* [x] No
*If Yes, see Addendum (page 2) for additional questions and space.
9. Contains PCBs? -> If Yes, answer a, b and c. [x] Yes [] No
a. Regulated by 40 CFR 761? [] Yes [x] No
b. Remediation under 40 CFR 761.61 (a)? [] Yes [x] No
c. Were PCB imported into the US? [] Yes [x] No
10. Regulated and/or Untreated Medical/Infectious Waste? [] Yes [x] No
11. Contains Asbestos? [] Yes [x] No
-> If Yes: [] Non-Friable [] Non-Friable - Regulated [] Friable

F. SHIPPING AND DOT INFORMATION

- 1. [x] One-Time Event [] Repeat Event/Ongoing Business
2. Estimated Quantity/Unit of Measure: 20000
[] Tons [] Yards [] Drums [] Gallons [x] Other: drums/bulk
3. Container Type and Size: drums/rolloff
4. USDOT Proper Shipping Name: [] N/A
RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.MIXTURE, 9, PG III

Certification Signature



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: OR344989

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1): If more space is needed, please attach additional pages.

properties. Material composition and contaminants may vary for each load, but will fall into the above parameters. Combine all solids, may contain D004-D043, sulfur, cyanide, oxidizing solids

Material Composition and Contaminants (Continued from page 1): If more space is needed, please attach additional pages.

5.	0-5 %
6.	
7.	
8.	
9.	
Total composition must be equal to or greater than 100%	
	≥100%

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)? Yes No

c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? → If Yes, complete question 4. Yes No

d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)? Yes No

→ If Yes, please check **one** of the following:

Waste meets LDR or treatment exemptions for organics (40 CFR 264.1082(c)(2) or (c)(4))

Waste contains VOCs that average <500 ppmw (CFR 264.1082(c)(1)) – will require annual update.

2. State Hazardous Waste → Please list all state waste codes: _____ < _____

3. For material that is Treated, Delisted, or Excluded → Please indicate the category, below:

Delisted Hazardous Waste Excluded Waste under 40 CFR 261.4 → Specify Exclusion: _____

Treated Hazardous Waste Debris Treated Characteristic Hazardous Waste → If checked, complete question 4.

4. Underlying Hazardous Constituents → Please list all Underlying Hazardous Constituents:

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.

a. Are you a TSDF? → If yes, please complete Benzene NESHAP questionnaire. If not, continue. Yes No

b. Does this material contain benzene? Yes No

1. If yes, what is the flow weighted average concentration? _____ ppmw

c. What is your facility's current total annual benzene quantity in Megagrams? <1 Mg 1–9.99 Mg ≥10 Mg

d. Is this waste soil from a remediation? Yes No

1. If yes, what is the benzene concentration in remediation waste? _____ ppmw

e. Does the waste contain >10% water/moisture? Yes No

f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw? Yes No

g. Is material exempt from controls in accordance with 40 CFR 61.342? Yes No

→ If yes, specify exemption: _____

h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF? Yes No

6. 40 CFR 63 GGGGG → Does the material contain <500 ppmw VOHAPs at the point of determination? Yes No

7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal. A "Determination of Acceptability" may be needed for CERCLA wastes not going to a CERCLA approved facility.

8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes and pCi/g: _____



Requested Facility: Chemical Waste Management (Hazardous Waste Facility) Unsure Profile Number: OR345089
 Multiple Generator Locations (Attach Locations) Request Certificate of Disposal Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- 1. Generator Name: Pasco Landfill NPL Site
- 2. Site Address: Kahlolus Road and Hwy12
(City, State, ZIP) Pasco WA 99301
- 3. County: Franklin
- 4. Contact Name: _____
- 5. Email: _____
- 6. Phone: _____ 7. Fax: _____
- 8. Generator EPA ID: WAD991281874 N/A
- 9. State ID: _____ N/A

C. MATERIAL INFORMATION

- 1. Common Name: miw
Describe Process Generating Material: See Attached

Pasco Landfill, Zone A drum removal. Drums/Bulk Zircon sand direct landfill. Not needing treatment under CAMU. Drums/Bulk are separated by physical properties, then haz cat in field and separated by chemical properties. Waste to be tested
- 2. Material Composition and Contaminants: See Attached

1.	95-100 %
2.	50-100 %
3.	
4.	

Total comp. must be equal to or greater than 100% ≥100%
- 3. State Waste Codes: _____ N/A
- 4. Color: various
- 5. Physical State at 70°F: Solid Liquid Other: _____
- 6. Free Liquid Range Percentage: _____ to _____ N/A
- 7. pH: _____ to _____ N/A
- 8. Strong Odor: Yes No Describe: _____
- 9. Flash Point: <140°F 140°-199°F ≥200° N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- 1. Analytical attached Yes
Please identify applicable samples and/or lab reports:
- 2. Other information attached (such as MSDS)? Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): _____ Date: _____
Title: _____
Company: _____

THINK GREEN®

B. BILLING INFORMATION

SAME AS GENERATOR

- 1. Billing Name: IWAG
- 2. Billing Address: _____
(City, State, ZIP) _____
- 3. Contact Name: _____
- 4. Email: _____
- 5. Phone: _____ 6. Fax: _____
- 7. WM Hauled? Yes No
- 8. P.O. Number: _____
- 9. Payment Method: Credit Account Cash Credit Card

D. REGULATORY INFORMATION

- 1. EPA Hazardous Waste? Yes* No
Code: _____
- 2. State Hazardous Waste? Yes No
Code: miw o
- 3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? Yes* No
- 4. Contains Underlying Hazardous Constituents? Yes* No
- 5. From an industry regulated under Benzene NESHAP? Yes* No
- 6. Facility remediation subject to 40 CFR 63 GGGGG? Yes* No
- 7. CERCLA or State-mandated clean-up? Yes* No
- 8. NRC or State-regulated radioactive or NORM waste? Yes* No
- *If Yes, see Addendum (page 2) for additional questions and space.**
- 9. Contains PCBs? → If Yes, answer a, b and c. Yes No
 - a. Regulated by 40 CFR 761? Yes No
 - b. Remediation under 40 CFR 761.61 (a)? Yes No
 - c. Were PCB imported into the US? Yes No
- 10. Regulated and/or Untreated Medical/Infectious Waste? Yes No
- 11. Contains Asbestos? Yes No
→ If Yes: Non-Friable Non-Friable - Regulated Friable

F. SHIPPING AND DOT INFORMATION

- 1. One-Time Event Repeat Event/Ongoing Business
- 2. Estimated Quantity/Unit of Measure: 20000
 Tons Yards Drums Gallons Other: drums/bulk
- 3. Container Type and Size: drums/rolloff
- 4. USDOT Proper Shipping Name: _____ N/A
RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.MIXTURE, 9, PG III

Certification Signature



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: OR345089

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1): If more space is needed, please attach additional pages.

prior to shipping

Material Composition and Contaminants (Continued from page 1): If more space is needed, please attach additional pages.

Table with 2 columns: Material Composition and Contaminants, and Total composition must be equal to or greater than 100%. Rows 5-9.

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

Empty box for listing waste code numbers.

- b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)?
c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)?
d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)?

2. State Hazardous Waste -> Please list all state waste codes:

3. For material that is Treated, Delisted, or Excluded -> Please indicate the category, below:

- Delisted Hazardous Waste, Excluded Waste under 40 CFR 261.4, Treated Hazardous Waste Debris, Treated Characteristic Hazardous Waste

4. Underlying Hazardous Constituents -> Please list all Underlying Hazardous Constituents:

Empty box for listing hazardous constituents.

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.

- a. Are you a TSDF?
b. Does this material contain benzene?
c. What is your facility's current total annual benzene quantity in Megagrams?
d. Is this waste soil from a remediation?
e. Does the waste contain >10% water/moisture?
f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw?
g. Is material exempt from controls in accordance with 40 CFR 61.342?
h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF?

6. 40 CFR 63 GGGGG -> Does the material contain <500 ppmw VOHAPs at the point of determination?

7. CERCLA or State-Mandated clean up -> Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal.

8. NRC or state regulated radioactive or NORM Waste -> Please identify Isotopes and pCi/g:



Requested Facility: Chemical Waste Management (Hazardous Waste Facility) Unsure Profile Number: OR345090
 Multiple Generator Locations (Attach Locations) Request Certificate of Disposal Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

- 1. Generator Name: Pasco Landfill NPL Site
- 2. Site Address: Kahlolus Road and Hwy12
(City, State, ZIP) Pasco WA 99301
- 3. County: Franklin
- 4. Contact Name: _____
- 5. Email: _____
- 6. Phone: _____ 7. Fax: _____
- 8. Generator EPA ID: WAD991281874 N/A
- 9. State ID: _____ N/A

C. MATERIAL INFORMATION

- 1. Common Name: nDDE c
Describe Process Generating Material: See Attached

Pasco Landfill, Zone A drum removal. Drums ignitable liquids and sludges. Drums are separated by physical properties, then haz cat in field and separated by chemical properties. Waste to be tested prior to shipping to verify UHCs or any
- 2. Material Composition and Contaminants: See Attached

1.	c	5-100 %
2.	rm	1-200 mg/kg
3.		
4.		
Total comp. must be equal to or greater than 100%		≥100%
- 3. State Waste Codes: _____ N/A
- 4. Color: various
- 5. Physical State at 70°F: Solid Liquid Other: L/Sludge
- 6. Free Liquid Range Percentage: 5 to 100 N/A
- 7. pH: 3 to 11 N/A
- 8. Strong Odor: Yes No Describe: _____
- 9. Flash Point: <140°F 140°-199°F ≥200° N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

- 1. Analytical attached Yes
Please identify applicable samples and/or lab reports:
- 2. Other information attached (such as MSDS)? Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): _____ Date: _____
Title: _____
Company: _____

THINK GREEN.®

B. BILLING INFORMATION

SAME AS GENERATOR

- 1. Billing Name: IWAG
- 2. Billing Address: _____
(City, State, ZIP) _____
- 3. Contact Name: _____
- 4. Email: _____
- 5. Phone: _____ 6. Fax: _____
- 7. WM Hauled? Yes No
- 8. P.O. Number: _____
- 9. Payment Method: Credit Account Cash Credit Card

D. REGULATORY INFORMATION

- 1. EPA Hazardous Waste? Yes* No
Code: nDDE
- 2. State Hazardous Waste? Yes No
Code: _____
- 3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? Yes* No
- 4. Contains Underlying Hazardous Constituents? Yes* No
- 5. From an industry regulated under Benzene NESHAP? Yes* No
- 6. Facility remediation subject to 40 CFR 63 GGGGG? Yes* No
- 7. CERCLA or State-mandated clean-up? Yes* No
- 8. NRC or State-regulated radioactive or NORM waste? Yes* No
***If Yes, see Addendum (page 2) for additional questions and space.**
- 9. Contains PCBs? → If Yes, answer a, b and c. Yes No
a. Regulated by 40 CFR 761? Yes No
b. Remediation under 40 CFR 761.61 (a)? Yes No
c. Were PCB imported into the US? Yes No
- 10. Regulated and/or Untreated Medical/Infectious Waste? Yes No
- 11. Contains Asbestos? Yes No
→ If Yes: Non-Friable Non-Friable - Regulated Friable

F. SHIPPING AND DOT INFORMATION

- 1. One-Time Event Repeat Event/Ongoing Business
- 2. Estimated Quantity/Unit of Measure: 10000
 Tons Yards Drums Gallons Other: _____
- 3. Container Type and Size: overpack or 55g
- 4. USDOT Proper Shipping Name: _____ N/A
UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3, PG II

Certification Signature



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: OR345090

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1): If more space is needed, please attach additional pages.

other RCRA waste codes

Material Composition and Contaminants (Continued from page 1): If more space is needed, please attach additional pages.

Table with 2 columns: Material Composition and Contaminants, Total composition must be equal to or greater than 100%. Rows 5-9.

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

Empty box for listing waste code numbers.

- b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)?
c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)?
d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)?

2. State Hazardous Waste -> Please list all state waste codes:

3. For material that is Treated, Delisted, or Excluded -> Please indicate the category, below:

- Delisted Hazardous Waste, Excluded Waste under 40 CFR 261.4, Treated Hazardous Waste Debris, Treated Characteristic Hazardous Waste

4. Underlying Hazardous Constituents -> Please list all Underlying Hazardous Constituents:

varies per load, will update LDRs for each load

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.

- a. Are you a TSDF?
b. Does this material contain benzene?
c. What is your facility's current total annual benzene quantity in Megagrams?
d. Is this waste soil from a remediation?
e. Does the waste contain >10% water/moisture?
f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw?
g. Is material exempt from controls in accordance with 40 CFR 61.342?
h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF?

6. 40 CFR 63 GGGGG -> Does the material contain <500 ppmw VOHAPs at the point of determination?

7. CERCLA or State-Mandated clean up -> Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal.

8. NRC or state regulated radioactive or NORM Waste -> Please identify Isotopes and pCi/g:



Additional Profile Information

Profile Number: OR345090

C. MATERIAL INFORMATION

Material Composition and Contaminants (Continued from page 2):

If more space is needed, please attach additional pages.

10.	
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31.	
32.	
33.	
34.	
35.	
36.	
37.	
38.	
39.	
40.	
Total composition must be equal to or greater than 100%	
	≥100%

D. REGULATORY INFORMATION

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers (Continued from page 2):

2. Form Code:

3. Source Code:

USEI Grand View Draft Reference Profiles



US Ecology Nevada (Beatty)
 US Ecology Idaho (Grand View)
 US Ecology Texas (Robstown)
 US Ecology Michigan (Detroit)

800-239-3943
 800-274-1516
 800-242-3209
 800-396-3265

PROFILE # _____

WASTE/MATERIAL PROFILE FORM

A. GENERATOR INFORMATION			
1. Generator: Pasco Landfill NPL Site		<input type="checkbox"/> Billing information is same	<input type="checkbox"/> P.O. required for payment
2. Facility Address: Kahlotus Road and Hwy12		12. Billing Company: IWAG	
3. Mailing Address:		13. Billing Address:	
4. City/State/Zip: Pasco WA 99301		14. City/State/Zip:	
5. Technical Contact:		15. Billing Contact:	
6. Phone:	7. Fax:	16. Phone:	17. Fax:
8. Generator Status: <input type="checkbox"/> CESQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> LQG			
9. EPA ID #: WAD991281874		10. State ID #:	
11. NAICS CODES:			
B. SHIPPING INFORMATION			
1. US DOT Shipping name: Not DOT regulated, UN2910 or UN2912 depending on final package characterization			
2. Hazard Class: none or 7	3. UN/NA #: see above	4. Packaging Group: NA	5. RQ: None
6. Container Type: <input checked="" type="checkbox"/> Bulk <input type="checkbox"/> Totes <input type="checkbox"/> Pallet <input type="checkbox"/> Boxes <input type="checkbox"/> Drums <input type="checkbox"/> Other, Describe: Bulk, Drums or Overpacks			
7. Frequency: <input checked="" type="checkbox"/> Year <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> 1 time <input type="checkbox"/> Other, Describe:			
8. Shipment: Size: 55 to 85 gal		Quantity: 10,000 drums	9. Waste Import: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Waste Import Supplement)
C. GENERAL MATERIAL & REGULATORY INFORMATION			
1. Common name: Zircon casting sands and debris			
2. Process generating: Material is being exhumed from Pasco Landfill, Zone A remediation/drum removal. Waste is from alloy casting process at PCC Structurals using sands and thorium hardners. Drums/Bulk are separated by physical properties, then HazCat in the field and separated by chemical properties.			
3. Describe physical appearance: Sand in either intact drums, or with drum shards, and associated plastic, PPE and debris			
4. Odor: <input checked="" type="checkbox"/> None <input type="checkbox"/> Slight <input type="checkbox"/> Strong		5. Physical State: <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge/Slurry <input checked="" type="checkbox"/> Solid	
6. Describe Color: brown / black sand and debris		7. Liquid phases: <input type="checkbox"/> Single <input type="checkbox"/> Double Layer <input type="checkbox"/> Multi-layer	
8. Knowledge is from: <input type="checkbox"/> Lab analysis <input type="checkbox"/> MSDS <input checked="" type="checkbox"/> Process/generator knowledge			
9. Waste/Material Type (US Ecology Texas customers only): <input type="checkbox"/> N/A <input type="checkbox"/> Industrial <input type="checkbox"/> Non-Industrial			
10. Restricted under EPA Land Disposal Restrictions (§268)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
11. If LDR "Yes": <input type="checkbox"/> Wastewater <input type="checkbox"/> Non-wastewater <input type="checkbox"/> Debris (§268.2)		12. Alt. Standards for soil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. Is the material RCRA hazardous waste containing benzene and originating at a Petroleum Refinery (SIC 2911), Chemical Manufacturing Plant (SIC 2800 thru 2899) or Coke by-Product Recovery Plant (SIC 3312)? (If yes, complete Benzene Waste/Material Operations Supplement Form and Thermal Supplement Form): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
14. VO Conc.(§264.1083): <input checked="" type="checkbox"/> <500 ppmw <input type="checkbox"/> ≥500ppmw		15. Has it been treated after point of generation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16. CERCLA Regulated (Superfund) Waste: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		17. Butadiene waste regulated by §63 Subpart XX: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
18. Waste contains UHC constituent(s) (§268.48), above a treatment standard, other than those for which the waste exhibits a characteristic. (If yes, list all UHC's in Section D): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
19. Waste exempt from definition of "solid waste" or "hazardous waste" (If yes, list reference 40CFR _____): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
20. State Waste Codes:		none	
21. RCRA Waste Codes:		none	
22. Source Code: N/A		23. Form Code: N/A	
24. Management Code: H _____ (USE only)			

D. COMPOSITION (use additional form if necessary)						
Constituent	Units	TCLP	Totals	Range total ≥ 100%		
				Typical	Min	Max
zircon casting sands	%	<input type="checkbox"/>	<input type="checkbox"/>	90%	50%	100%
debris - plastic, ppe, drum shards, metal, concrete, wood	%	<input type="checkbox"/>	<input type="checkbox"/>	10%	0%	50%
		<input type="checkbox"/>	<input type="checkbox"/>			
Uranium 238	ppm	<input type="checkbox"/>	<input type="checkbox"/>	10	0	167
Thorium 232	ppm	<input type="checkbox"/>	<input type="checkbox"/>	35	0	55
		<input type="checkbox"/>	<input type="checkbox"/>			
see attached Radioactive Supplement		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			

E. CHARACTERISTICS						
1. Oxidizer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Reactive sulfides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
2. Explosive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Reactive cyanides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3. Organic peroxide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Water/air reactive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
4. Shock sensitive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Thermally unstable	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
5. Tires	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. TSCA regulated PCB waste (control sheet required with shipment)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
6. Pyrophoric	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Medical/infectious waste	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
7. Compressed gas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Radioactive (If yes, complete Profile Supplement for Radioactive Waste)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
8. Halogenated organics	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Hazardous Secondary Material (HSM)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
17. Possibility of incidental liquids from transportation?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No			
18. Is waste/material a solid using the paint filter test?		<input checked="" type="checkbox"/> Yes (solid)	<input type="checkbox"/> No (not solid)			
19. pH: (If solid, what is pH if mixed with water?)		Range _____ to _____	Typical _____	<input type="checkbox"/> ≤ 2	<input checked="" type="checkbox"/> 2 < 12.5	<input type="checkbox"/> ≥ 12.5
20. Flash Point:		>140F _____ ° F	<input type="checkbox"/> < 140 ° F			
20. Is the waste/material oil bearing from Petroleum Refining, Production or Transportation practices?				<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

F. GENERATOR'S CERTIFICATION		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	I certify this waste/material may be disposed without further treatment.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A	I certify this waste/material meets all requirements of legitimate recycling of hazardous secondary materials under 40 CFR 260.43 and/or I am complying with the conditions for generators using the verified recycler exclusion.

I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.

Print Name	Signature	Title	Date



US Ecology Nevada (Beatty) 800-239-3943
 US Ecology Idaho (Grand View) 800-274-1516
 US Ecology Texas (Robstown) 800-242-3209
 US Ecology Michigan (Detroit) 800-396-3265

PROFILE # _____

WASTE/MATERIAL PROFILE FORM

A. GENERATOR INFORMATION			
1. Generator: Pasco Landfill NPL Site		<input type="checkbox"/> Billing information is same	<input type="checkbox"/> P.O. required for payment
2. Facility Address: Kahlotus Road and Hwy12		12. Billing Company: IWAG	
3. Mailing Address:		13. Billing Address:	
4. City/State/Zip: Pasco WA 99301		14. City/State/Zip:	
5. Technical Contact:		15. Billing Contact:	
6. Phone:	7. Fax:	16. Phone:	17. Fax:
8. Generator Status: <input type="checkbox"/> CESQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> LQG			
9. EPA ID #: WAD991281874		10. State ID #:	
11. NAICS CODES:			
B. SHIPPING INFORMATION			
1. US DOT Shipping name: RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.SMIXTURE, 9, PG III			
2. Hazard Class: 9	3. UN/NA #: UN3077	4. Packaging Group: III	5. RQ: Yes
6. Container Type: <input checked="" type="checkbox"/> Bulk <input type="checkbox"/> Totes <input type="checkbox"/> Pallet <input type="checkbox"/> Boxes <input type="checkbox"/> Drums <input type="checkbox"/> Other, Describe: Bulk, Drums or Overpacks			
7. Frequency: <input checked="" type="checkbox"/> Year <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> 1 time <input type="checkbox"/> Other, Describe:			
8. Shipment: Size: 55 to 85 gal Quantity: 20,000 drums		9. Waste Import: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Waste Import Supplement)	
C. GENERAL MATERIAL & REGULATORY INFORMATION			
1. Common name: CAMU approved paint solids and debris			
2. Process generating: Material is being exhumed from Pasco Landfill, Zone A remediation/drum removal. Paint waste, disposed in drums. Drums/Bulk are separated by physical properties, then hazCat in the field and separated by chemical properties.			
3. Describe physical appearance: Solid paint waste in intact drums, or with drum shards, and associated plastic, PPE and debris			
4. Odor: <input checked="" type="checkbox"/> None <input type="checkbox"/> Slight <input type="checkbox"/> Strong		5. Physical State: <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge/Slurry <input checked="" type="checkbox"/> Solid	
6. Describe Color: Colored paint solids with debris		7. Liquid phases: <input type="checkbox"/> Single <input type="checkbox"/> Double Layer <input type="checkbox"/> Multi-layer	
8. Knowledge is from: <input checked="" type="checkbox"/> Lab analysis <input type="checkbox"/> MSDS <input checked="" type="checkbox"/> Process/generator knowledge			
9. Waste/Material Type (US Ecology Texas customers only): <input type="checkbox"/> N/A <input type="checkbox"/> Industrial <input type="checkbox"/> Non-Industrial			
10. Restricted under EPA Land Disposal Restrictions (§268)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
11. If LDR "Yes": <input type="checkbox"/> Wastewater <input checked="" type="checkbox"/> Non-wastewater <input type="checkbox"/> Debris (§268.2)		12. Alt. Standards for soil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. Is the material RCRA hazardous waste containing benzene and originating at a Petroleum Refinery (SIC 2911), Chemical Manufacturing Plant (SIC 2800 thru 2899) or Coke by-Product Recovery Plant (SIC 3312)? (If yes, complete Benzene Waste/Material Operations Supplement Form and Thermal Supplement Form): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
14. VO Conc.(§264.1083): <input checked="" type="checkbox"/> <500 ppmw <input type="checkbox"/> ≥500ppmw		15. Has it been treated after point of generation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16. CERCLA Regulated (Superfund) Waste: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		17. Butadiene waste regulated by §63 Subpart XX: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
18. Waste contains UHC constituent(s) (§268.48), above a treatment standard, other than those for which the waste exhibits a characteristic. (If yes, list all UHC's in Section D): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
19. Waste exempt from definition of "solid waste" or "hazardous waste" (If yes, list reference 40CFR _____): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
20. State Waste Codes:		none	
21. RCRA Waste Codes:		none	
22. Source Code: N/A		23. Form Code: N/A	
24. Management Code: H _____ (USE only)			

D. COMPOSITION (use additional form if necessary)						
Constituent	Units	TCLP	Totals	Range total ≥ 100%		
				Typical	Min	Max
Solid paint waste	%	<input type="checkbox"/>	<input type="checkbox"/>	90%	50%	100%
debris - plastic, ppe, drum shards, metal, concrete, wood	%	<input type="checkbox"/>	<input type="checkbox"/>	10%	0%	50%
RCRA codes do not apply since CAMU approved by WDOE/IDEQ		<input type="checkbox"/>	<input type="checkbox"/>			
Drums/Bulk with possible D004-D043, not needing treatment under CAMU.		<input type="checkbox"/>	<input type="checkbox"/>			
Various VOCs, SVOCs, Metals - material composition and contaminants will vary by load, but fall into above parameters		<input type="checkbox"/>	<input type="checkbox"/>			
Estimated ranges of contaminants will be included		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			

E. CHARACTERISTICS						
1. Oxidizer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Reactive sulfides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
2. Explosive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Reactive cyanides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3. Organic peroxide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Water/air reactive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
4. Shock sensitive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Thermally unstable	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
5. Tires	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. TSCA regulated PCB waste (control sheet required with shipment)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
6. Pyrophoric	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Medical/infectious waste	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
7. Compressed gas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Radioactive (If yes, complete Profile Supplement for Radioactive Waste)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
8. Halogenated organics	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Hazardous Secondary Material (HSM)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
17. Possibility of incidental liquids from transportation?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				
18. Is waste/material a solid using the paint filter test?	<input checked="" type="checkbox"/> Yes (solid)	<input type="checkbox"/> No (not solid)				
19. pH: (If solid, what is pH if mixed with water?)	Range _____ to _____	Typical _____	<input type="checkbox"/> ≤ 2	<input checked="" type="checkbox"/> 2 < 12.5	<input type="checkbox"/> ≥ 12.5	
20. Flash Point:	>140F _____ ° F	<input type="checkbox"/> < 140 ° F				
20. Is the waste/material oil bearing from Petroleum Refining, Production or Transportation practices?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No				

F. GENERATOR'S CERTIFICATION			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	I certify this waste/material may be disposed without further treatment.	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A	I certify this waste/material meets all requirements of legitimate recycling of hazardous secondary materials under 40 CFR 260.43 and/or I am complying with the conditions for generators using the verified recycler exclusion.	
<p>I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.</p>			
Print Name	Signature	Title	Date



US Ecology Nevada (Beatty) 800-239-3943
 US Ecology Idaho (Grand View) 800-274-1516
 US Ecology Texas (Robstown) 800-242-3209
 US Ecology Michigan (Detroit) 800-396-3265

PROFILE # _____

WASTE/MATERIAL PROFILE FORM

A. GENERATOR INFORMATION			
1. Generator: Pasco Landfill NPL Site		<input type="checkbox"/> Billing information is same	<input type="checkbox"/> P.O. required for payment
2. Facility Address: Kahlotus Road and Hwy12		12. Billing Company: IWAG	
3. Mailing Address:		13. Billing Address:	
4. City/State/Zip: Pasco WA 99301		14. City/State/Zip:	
5. Technical Contact:		15. Billing Contact:	
6. Phone:	7. Fax:	16. Phone:	17. Fax:
8. Generator Status: <input type="checkbox"/> CESQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> LQG			
9. EPA ID #: WAD991281874		10. State ID #:	
11. NAICS CODES:			
B. SHIPPING INFORMATION			
1. US DOT Shipping name: RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S, 9, PG III			
2. Hazard Class: 9	3. UN/NA #: UN3077	4. Packaging Group: III	5. RQ: Yes
6. Container Type: <input checked="" type="checkbox"/> Bulk <input type="checkbox"/> Totes <input type="checkbox"/> Pallet <input type="checkbox"/> Boxes <input type="checkbox"/> Drums <input type="checkbox"/> Other, Describe: Bulk, Drums or Overpacks			
7. Frequency: <input checked="" type="checkbox"/> Year <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> 1 time <input type="checkbox"/> Other, Describe:			
8. Shipment: Size: 55 to 85 gal Quantity: 5,000 drums		9. Waste Import: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Waste Import Supplement)	
C. GENERAL MATERIAL & REGULATORY INFORMATION			
1. Common name: CAMU approved inorganic and organic solids and debris			
2. Process generating: Material is being exhumed from Pasco Landfill, Zone A remediation/drum removal. Inorganic and organic solids disposed in drums. Drums/Bulk are separated by physical properties, then hazCat in the field and separated by chemical properties.			
3. Describe physical appearance: Solid waste in intact drums, or with drum shards, and associated plastic, PPE and debris			
4. Odor: <input checked="" type="checkbox"/> None <input type="checkbox"/> Slight <input type="checkbox"/> Strong		5. Physical State: <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge/Slurry <input checked="" type="checkbox"/> Solid	
6. Describe Color: brown / black solids and debris		7. Liquid phases: <input type="checkbox"/> Single <input type="checkbox"/> Double Layer <input type="checkbox"/> Multi-layer	
8. Knowledge is from: <input checked="" type="checkbox"/> Lab analysis <input type="checkbox"/> MSDS <input checked="" type="checkbox"/> Process/generator knowledge			
9. Waste/Material Type (US Ecology Texas customers only): <input type="checkbox"/> N/A <input type="checkbox"/> Industrial <input type="checkbox"/> Non-Industrial			
10. Restricted under EPA Land Disposal Restrictions (§268)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
11. If LDR "Yes": <input type="checkbox"/> Wastewater <input checked="" type="checkbox"/> Non-wastewater <input type="checkbox"/> Debris (§268.2)		12. Alt. Standards for soil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. Is the material RCRA hazardous waste containing benzene and originating at a Petroleum Refinery (SIC 2911), Chemical Manufacturing Plant (SIC 2800 thru 2899) or Coke by-Product Recovery Plant (SIC 3312)? (If yes, complete Benzene Waste/Material Operations Supplement Form and Thermal Supplement Form): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
14. VO Conc.(§264.1083): <input checked="" type="checkbox"/> <500 ppmw <input type="checkbox"/> ≥500ppmw		15. Has it been treated after point of generation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16. CERCLA Regulated (Superfund) Waste: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		17. Butadiene waste regulated by §63 Subpart XX: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
18. Waste contains UHC constituent(s) (§268.48), above a treatment standard, other than those for which the waste exhibits a characteristic. (If yes, list all UHC's in Section D): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
19. Waste exempt from definition of "solid waste" or "hazardous waste" (If yes, list reference 40CFR _____): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
20. State Waste Codes:		none	
21. RCRA Waste Codes:		none	
22. Source Code: N/A		23. Form Code: N/A	
24. Management Code: H _____ (USE only)			

D. COMPOSITION <i>(use additional form if necessary)</i>						
Constituent	Units	TCLP	Totals	Range total ≥ 100%		
				Typical	Min	Max
Solid waste including pesticides, wood treating, other	%	<input type="checkbox"/>	<input type="checkbox"/>	90%	50%	100%
debris - plastic, ppe, drum shards, metal, concrete, wood	%	<input type="checkbox"/>	<input type="checkbox"/>	10%	0%	50%
RCRA codes do not apply since CAMU approved by WDOE/IDEQ		<input type="checkbox"/>	<input type="checkbox"/>			
D004-D043 codes not needing treatment under CAMU.		<input type="checkbox"/>	<input type="checkbox"/>			
Various VOCs, SVOCs, Metals, Pesticides, Herbicides, and PCBs		<input type="checkbox"/>	<input type="checkbox"/>			
data from historical records and existing analytical		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
No liquids, transformers, or items		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
waste is confirmed NOT Ignitable, Corrosive or Reactive		<input type="checkbox"/>	<input type="checkbox"/>			
Estimated ranges of contaminants will be included		<input type="checkbox"/>	<input type="checkbox"/>			
E. CHARACTERISTICS						
1. Oxidizer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Reactive sulfides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
2. Explosive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Reactive cyanides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3. Organic peroxide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Water/air reactive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
4. Shock sensitive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Thermally unstable	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
5. Tires	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. TSCA regulated PCB waste <i>(control sheet required with shipment)</i>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
6. Pyrophoric	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Medical/infectious waste	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
7. Compressed gas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Radioactive <i>(If yes, complete Profile Supplement for Radioactive Waste)</i>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
8. Halogenated organics	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Hazardous Secondary Material (HSM)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
17. Possibility of incidental liquids from transportation?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
18. Is waste/material a solid using the paint filter test?		<input checked="" type="checkbox"/> Yes (solid)	<input type="checkbox"/> No (not solid)			
19. pH: <i>(If solid, what is pH if mixed with water?)</i>		Range _____ to _____	Typical _____	<input type="checkbox"/> ≤ 2	<input checked="" type="checkbox"/> 2 < 12.5	<input type="checkbox"/> ≥ 12.5
20. Flash Point:		<input checked="" type="checkbox"/> >140F ° F	<input type="checkbox"/> < 140 ° F			
20. Is the waste/material oil bearing from Petroleum Refining, Production or Transportation practices?				<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
F. GENERATOR'S CERTIFICATION						
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	I certify this waste/material may be disposed without further treatment.				
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A	I certify this waste/material meets all requirements of legitimate recycling of hazardous secondary materials under 40 CFR 260.43 and/or I am complying with the conditions for generators using the verified recycler exclusion.				
<p>I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.</p>						
Print Name		Signature		Title		Date



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PROFILE # _____

WASTE/MATERIAL PROFILE FORM

A. GENERATOR INFORMATION			
1. Generator: Pasco Landfill NPL Site		<input type="checkbox"/> Billing information is same	<input type="checkbox"/> P.O. required for payment
2. Facility Address: Kahlotus Road and Hwy12		12. Billing Company: IWAG	
3. Mailing Address:		13. Billing Address:	
4. City/State/Zip: Pasco WA 99301		14. City/State/Zip:	
5. Technical Contact:		15. Billing Contact:	
6. Phone:	7. Fax:	16. Phone:	17. Fax:
8. Generator Status: <input type="checkbox"/> CESQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> LQG			
9. EPA ID #: WAD991281874		10. State ID #:	
11. NAICS CODES:			
B. SHIPPING INFORMATION			
1. US DOT Shipping name: RQ, UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S, 9, PG III			
2. Hazard Class: 9	3. UN/NA #: ??	4. Packaging Group: III	5. RQ: ???
6. Container Type: <input checked="" type="checkbox"/> Bulk <input type="checkbox"/> Totes <input type="checkbox"/> Pallet <input type="checkbox"/> Boxes <input type="checkbox"/> Drums <input type="checkbox"/> Other, Describe: Bulk, Drums or Overpacks			
7. Frequency: <input checked="" type="checkbox"/> Year <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> 1 time <input type="checkbox"/> Other, Describe:			
8. Shipment: Size: 55 to 85 gal Quantity: 20,000 drums		9. Waste Import: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Waste Import Supplement)	
C. GENERAL MATERIAL & REGULATORY INFORMATION			
1. Common name: CAMU approved paint liquids and debris			
2. Process generating: Material is being exhumed from Pasco Landfill, Zone A remediation. Paint waste disposed in drums. Drums/Bulk are separated by physical properties, then hazCat in the field and separated by chemical properties.			
3. Describe physical appearance: Liquid paint waste in intact drums, or with drum shards, and associated plastic, PPE and debris			
4. Odor: <input checked="" type="checkbox"/> None <input type="checkbox"/> Slight <input type="checkbox"/> Strong		5. Physical State: <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Sludge/Slurry <input type="checkbox"/> Solid	
6. Describe Color: Colored paint solids with debris		7. Liquid phases: <input checked="" type="checkbox"/> Single <input type="checkbox"/> Double Layer <input type="checkbox"/> Multi-layer	
8. Knowledge is from: <input checked="" type="checkbox"/> Lab analysis <input checked="" type="checkbox"/> MSDS <input checked="" type="checkbox"/> Process/generator knowledge			
9. Waste/Material Type (US Ecology Texas customers only): <input type="checkbox"/> N/A <input type="checkbox"/> Industrial <input type="checkbox"/> Non-Industrial			
10. Restricted under EPA Land Disposal Restrictions (§268)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
11. If LDR "Yes": <input type="checkbox"/> Wastewater <input checked="" type="checkbox"/> Non-wastewater <input type="checkbox"/> Debris (§268.2)		12. Alt. Standards for soil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. Is the material RCRA hazardous waste containing benzene and originating at a Petroleum Refinery (SIC 2911), Chemical Manufacturing Plant (SIC 2800 thru 2899) or Coke by-Product Recovery Plant (SIC 3312)? (If yes, complete Benzene Waste/Material Operations Supplement Form and Thermal Supplement Form): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
14. VO Conc.(§264.1083): <input checked="" type="checkbox"/> <500 ppmw <input type="checkbox"/> ≥500ppmw		15. Has it been treated after point of generation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16. CERCLA Regulated (Superfund) Waste: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		17. Butadiene waste regulated by §63 Subpart XX: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
18. Waste contains UHC constituent(s) (§268.48), above a treatment standard, other than those for which the waste exhibits a characteristic. (If yes, list all UHC's in Section D): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
19. Waste exempt from definition of "solid waste" or "hazardous waste" (If yes, list reference 40CFR _____): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
20. State Waste Codes:		none	
21. RCRA Waste Codes:		none	
22. Source Code: N/A		23. Form Code: N/A	
24. Management Code: H _____ (USE only)			

D. COMPOSITION (use additional form if necessary)						
Constituent	Units	TCLP	Totals	Range total ≥ 100%		
				Typical	Min	Max
Liquid paint waste	%	<input type="checkbox"/>	<input type="checkbox"/>	90%	50%	100%
debris - plastic, ppe, drum shards, metal, concrete, wood	%	<input type="checkbox"/>	<input type="checkbox"/>	10%	0%	50%
RCRA codes do not apply since CAMU approved by WDOE/IDEQ		<input type="checkbox"/>	<input type="checkbox"/>			
D004-D043 codes not needing treatment under CAMU.		<input type="checkbox"/>	<input type="checkbox"/>			
Various VOCs, SVOCs, Metals		<input type="checkbox"/>	<input type="checkbox"/>			
data from historical records and existing analytical		<input type="checkbox"/>	<input type="checkbox"/>			
waste is confirmed NOT Ignitable, Corrosive or Reactive		<input type="checkbox"/>	<input type="checkbox"/>			
Estimated ranges of contaminants will be included		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			

E. CHARACTERISTICS						
1. Oxidizer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Reactive sulfides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
2. Explosive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Reactive cyanides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3. Organic peroxide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Water/air reactive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
4. Shock sensitive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Thermally unstable	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
5. Tires	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. TSCA regulated PCB waste (control sheet required with shipment)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
6. Pyrophoric	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Medical/infectious waste	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
7. Compressed gas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Radioactive (If yes, complete Profile Supplement for Radioactive Waste)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
8. Halogenated organics	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Hazardous Secondary Material (HSM)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
17. Possibility of incidental liquids from transportation?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				
18. Is waste/material a solid using the paint filter test?	<input type="checkbox"/> Yes (solid)	<input checked="" type="checkbox"/> No (not solid)				
19. pH: (If solid, what is pH if mixed with water?)	Range _____ to _____	Typical _____	<input type="checkbox"/> ≤ 2	<input checked="" type="checkbox"/> 2 < 12.5	<input type="checkbox"/> ≥ 12.5	
20. Flash Point:	>140F ° F	<input type="checkbox"/> < 140 ° F				
20. Is the waste/material oil bearing from Petroleum Refining, Production or Transportation practices?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No				

F. GENERATOR'S CERTIFICATION			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	I certify this waste/material may be disposed without further treatment.	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A	I certify this waste/material meets all requirements of legitimate recycling of hazardous secondary materials under 40 CFR 260.43 and/or I am complying with the conditions for generators using the verified recycler exclusion.	
<p>I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.</p>			
Print Name	Signature	Title	Date



US Ecology Nevada (Beatty) 800-239-3943
 US Ecology Idaho (Grand View) 800-274-1516
 US Ecology Texas (Robstown) 800-242-3209
 US Ecology Michigan (Detroit) 800-396-3265

PROFILE # _____

WASTE/MATERIAL PROFILE FORM

A. GENERATOR INFORMATION			
1. Generator: Pasco Landfill NPL Site		<input type="checkbox"/> Billing information is same	<input type="checkbox"/> P.O. required for payment
2. Facility Address: Kahlotus Road and Hwy12		12. Billing Company: IWAG	
3. Mailing Address:		13. Billing Address:	
4. City/State/Zip: Pasco WA 99301		14. City/State/Zip:	
5. Technical Contact:		15. Billing Contact:	
6. Phone:	7. Fax:	16. Phone:	17. Fax:
8. Generator Status: <input type="checkbox"/> CESQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> LQG			
9. EPA ID #: WAD991281874		10. State ID #:	
11. NAICS CODES:			
B. SHIPPING INFORMATION			
1. US DOT Shipping name: RQ, UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S, 9, PG III			
2. Hazard Class: 9	3. UN/NA #: UN3082	4. Packaging Group: III	5. RQ: Yes
6. Container Type: <input checked="" type="checkbox"/> Bulk <input type="checkbox"/> Totes <input type="checkbox"/> Pallet <input type="checkbox"/> Boxes <input type="checkbox"/> Drums <input type="checkbox"/> Other, Describe: Bulk, Drums or Overpacks			
7. Frequency: <input checked="" type="checkbox"/> Year <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> 1 time <input type="checkbox"/> Other, Describe:			
8. Shipment: Size: 55 to 85 gal Quantity: 2,500 drums		9. Waste Import: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Waste Import Supplement)	
C. GENERAL MATERIAL & REGULATORY INFORMATION			
1. Common name: CAMU approved inorganic and organic liquids and debris			
2. Process generating: Material is being exhumed from Pasco Landfill, Zone A remediation. Inorganic and organic liquids disposed in drums. Drums/Bulk are separated by physical properties, then hazCat in the field and separated by chemical properties.			
3. Describe physical appearance: liquid waste in intact drums, or with drum shards, and associated plastic, PPE and debris			
4. Odor: <input checked="" type="checkbox"/> None <input type="checkbox"/> Slight <input type="checkbox"/> Strong		5. Physical State: <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Sludge/Slurry <input type="checkbox"/> Solid	
6. Describe Color: various		7. Liquid phases: <input checked="" type="checkbox"/> Single <input type="checkbox"/> Double Layer <input type="checkbox"/> Multi-layer	
8. Knowledge is from: <input checked="" type="checkbox"/> Lab analysis <input type="checkbox"/> MSDS <input checked="" type="checkbox"/> Process/generator knowledge			
9. Waste/Material Type (US Ecology Texas customers only): <input type="checkbox"/> N/A <input type="checkbox"/> Industrial <input type="checkbox"/> Non-Industrial			
10. Restricted under EPA Land Disposal Restrictions (§268)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
11. If LDR "Yes": <input type="checkbox"/> Wastewater <input checked="" type="checkbox"/> Non-wastewater <input type="checkbox"/> Debris (§268.2)		12. Alt. Standards for soil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. Is the material RCRA hazardous waste containing benzene and originating at a Petroleum Refinery (SIC 2911), Chemical Manufacturing Plant (SIC 2800 thru 2899) or Coke by-Product Recovery Plant (SIC 3312)? (If yes, complete Benzene Waste/Material Operations Supplement Form and Thermal Supplement Form): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
14. VO Conc.(§264.1083): <input checked="" type="checkbox"/> <500 ppmw <input type="checkbox"/> ≥500ppmw		15. Has it been treated after point of generation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16. CERCLA Regulated (Superfund) Waste: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		17. Butadiene waste regulated by §63 Subpart XX: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
18. Waste contains UHC constituent(s) (§268.48), above a treatment standard, other than those for which the waste exhibits a characteristic. (If yes, list all UHC's in Section D): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
19. Waste exempt from definition of "solid waste" or "hazardous waste" (If yes, list reference 40CFR _____): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
20. State Waste Codes:		none	
21. RCRA Waste Codes:		none	
22. Source Code: N/A		23. Form Code: N/A	
24. Management Code: H _____ (USE only)			

D. COMPOSITION (use additional form if necessary)						
Constituent	Units	TCLP	Totals	Range total ≥ 100%		
				Typical	Min	Max
Liquid waste including pesticides, wood treating, other	%	<input type="checkbox"/>	<input type="checkbox"/>	90%	50%	100%
debris - plastic, ppe, drum shards, metal, concrete, wood	%	<input type="checkbox"/>	<input type="checkbox"/>	10%	0%	50%
RCRA codes do not apply since CAMU approved by WDOE/IDEQ		<input type="checkbox"/>	<input type="checkbox"/>			
D004-D043 codes not needing treatment under CAMU.		<input type="checkbox"/>	<input type="checkbox"/>			
Various VOCs, SVOCs, Metals, Pesticides, Herbicides		<input type="checkbox"/>	<input type="checkbox"/>			
PCBs liquids	ppm	<input type="checkbox"/>	<input type="checkbox"/>	<10	0	49
data from historical records and existing analytical		<input type="checkbox"/>	<input type="checkbox"/>			
No transformers, or items		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
waste is confirmed NOT Ignitable, Corrosive or Reactive		<input type="checkbox"/>	<input type="checkbox"/>			
Estimated ranges of contaminants will be included		<input type="checkbox"/>	<input type="checkbox"/>			
E. CHARACTERISTICS						
1. Oxidizer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Reactive sulfides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
2. Explosive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Reactive cyanides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3. Organic peroxide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Water/air reactive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
4. Shock sensitive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Thermally unstable	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
5. Tires	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. TSCA regulated PCB waste (control sheet required with shipment)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
6. Pyrophoric	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Medical/infectious waste	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
7. Compressed gas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Radioactive (If yes, complete Profile Supplement for Radioactive Waste)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
8. Halogenated organics	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Hazardous Secondary Material (HSM)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
17. Possibility of incidental liquids from transportation?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
18. Is waste/material a solid using the paint filter test?		<input type="checkbox"/> Yes (solid)	<input checked="" type="checkbox"/> No (not solid)			
19. pH: (If solid, what is pH if mixed with water?)		Range _____ to _____	Typical _____	<input type="checkbox"/> ≤ 2	<input checked="" type="checkbox"/> 2 < 12.5	<input type="checkbox"/> ≥ 12.5
20. Flash Point:		<input checked="" type="checkbox"/> >140F ° F	<input type="checkbox"/> < 140 ° F			
20. Is the waste/material oil bearing from Petroleum Refining, Production or Transportation practices?				<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
F. GENERATOR'S CERTIFICATION						
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	I certify this waste/material may be disposed without further treatment.				
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A	I certify this waste/material meets all requirements of legitimate recycling of hazardous secondary materials under 40 CFR 260.43 and/or I am complying with the conditions for generators using the verified recycler exclusion.				
<p>I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.</p>						
Print Name		Signature		Title		Date



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PROFILE # _____

WASTE/MATERIAL PROFILE FORM

A. GENERATOR INFORMATION			
1. Generator: Pasco Landfill NPL Site		<input type="checkbox"/> Billing information is same	<input type="checkbox"/> P.O. required for payment
2. Facility Address: Kahlotus Road and Hwy12		12. Billing Company: IWAG	
3. Mailing Address:		13. Billing Address:	
4. City/State/Zip: Pasco WA 99301		14. City/State/Zip:	
5. Technical Contact:		15. Billing Contact:	
6. Phone:	7. Fax:	16. Phone:	17. Fax:
8. Generator Status: <input type="checkbox"/> CESQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> LQG			
9. EPA ID #: WAD991281874		10. State ID #:	
11. NAICS CODES:			
B. SHIPPING INFORMATION			
1. US DOT Shipping name: UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3, PG II			
2. Hazard Class: 3	3. UN/NA #: UN1992	4. Packaging Group: II	5. RQ: No
6. Container Type: <input type="checkbox"/> Bulk <input type="checkbox"/> Totes <input type="checkbox"/> Pallet <input type="checkbox"/> Boxes <input type="checkbox"/> Drums <input checked="" type="checkbox"/> Other, Describe: Totes, Drums or Overpacks			
7. Frequency: <input checked="" type="checkbox"/> Year <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> 1 time <input type="checkbox"/> Other, Describe:			
8. Shipment: Size: 55 to 85 gal Quantity: 2500 drums		9. Waste Import: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Waste Import Supplement)	
C. GENERAL MATERIAL & REGULATORY INFORMATION			
1. Common name: D001 ignitable liquids/sludges			
2. Process generating: Material is being exhumed from Pasco Landfill, Zone A remediation/drum removal. Mixed liquid waste disposed in drums. Drums are separated by physical properties, then haz cat in field and separated by chemical properties. Waste to be tested prior to shipping to verify UHCs or any other RCRA codes.			
3. Describe physical appearance: liquid waste in intact drums, or with drum shards, and associated plastic, PPE and debris			
4. Odor: <input checked="" type="checkbox"/> None <input type="checkbox"/> Slight <input type="checkbox"/> Strong		5. Physical State: <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Sludge/Slurry <input type="checkbox"/> Solid	
6. Describe Color: various		7. Liquid phases: <input checked="" type="checkbox"/> Single <input type="checkbox"/> Double Layer <input type="checkbox"/> Multi-layer	
8. Knowledge is from: <input checked="" type="checkbox"/> Lab analysis <input type="checkbox"/> MSDS <input checked="" type="checkbox"/> Process/generator knowledge			
9. Waste/Material Type (US Ecology Texas customers only): <input type="checkbox"/> N/A <input type="checkbox"/> Industrial <input type="checkbox"/> Non-Industrial			
10. Restricted under EPA Land Disposal Restrictions (§268)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
11. If LDR "Yes": <input type="checkbox"/> Wastewater <input checked="" type="checkbox"/> Non-wastewater <input type="checkbox"/> Debris (§268.2)		12. Alt. Standards for soil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. Is the material RCRA hazardous waste containing benzene and originating at a Petroleum Refinery (SIC 2911), Chemical Manufacturing Plant (SIC 2800 thru 2899) or Coke by-Product Recovery Plant (SIC 3312)? (If yes, complete Benzene Waste/Material Operations Supplement Form and Thermal Supplement Form): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
14. VO Conc.(§264.1083): <input type="checkbox"/> <500 ppmw <input checked="" type="checkbox"/> ≥500ppmw		15. Has it been treated after point of generation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16. CERCLA Regulated (Superfund) Waste: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		17. Butadiene waste regulated by §63 Subpart XX: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
18. Waste contains UHC constituent(s) (§268.48), above a treatment standard, other than those for which the waste exhibits a characteristic. (If yes, list all UHC's in Section D): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
19. Waste exempt from definition of "solid waste" or "hazardous waste" (If yes, list reference 40CFR _____): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
20. State Waste Codes:			
21. RCRA Waste Codes: D001			
22. Source Code: N/A			
23. Form Code: N/A		24. Management Code: H _____ (USE only)	

D. COMPOSITION (use additional form if necessary)						
Constituent	Units	TCLP	Totals	Range total ≥ 100%		
				Typical	Min	Max
Mixed liquid organic and inorganic waste	%	<input type="checkbox"/>	<input type="checkbox"/>	90%	50%	100%
debris - plastic, ppe, drum shards, metal, concrete, wood	%	<input type="checkbox"/>	<input type="checkbox"/>	10%	0%	50%
		<input type="checkbox"/>	<input type="checkbox"/>			
UHCs vary per load, will update LDRs for each load		<input type="checkbox"/>	<input type="checkbox"/>			
Site analytical (to be provided later)		<input type="checkbox"/>	<input type="checkbox"/>			
PCBs liquids	ppm	<input type="checkbox"/>	<input type="checkbox"/>	<10	0	49
various UHCs	ppm	<input type="checkbox"/>	<input type="checkbox"/>		1	200
No transformers, or items		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>			

E. CHARACTERISTICS						
1. Oxidizer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Reactive sulfides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
2. Explosive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Reactive cyanides _____ ppm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3. Organic peroxide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Water/air reactive	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
4. Shock sensitive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Thermally unstable	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
5. Tires	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. TSCA regulated PCB waste (control sheet required with shipment)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
6. Pyrophoric	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Medical/infectious waste	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
7. Compressed gas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Radioactive (If yes, complete Profile Supplement for Radioactive Waste)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
8. Halogenated organics	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Hazardous Secondary Material (HSM)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
17. Possibility of incidental liquids from transportation?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				
18. Is waste/material a solid using the paint filter test?	<input type="checkbox"/> Yes (solid)	<input checked="" type="checkbox"/> No (not solid)				
19. pH: (If solid, what is pH if mixed with water?)	Range <u>3</u> to <u>11</u>	Typical _____	<input type="checkbox"/> ≤ 2	<input checked="" type="checkbox"/> 2 < 12.5	<input type="checkbox"/> ≥ 12.5	
20. Flash Point:	_____ ° F	<input checked="" type="checkbox"/> < 140 ° F				
20. Is the waste/material oil bearing from Petroleum Refining, Production or Transportation practices?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No				

F. GENERATOR'S CERTIFICATION			
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	I certify this waste/material may be disposed without further treatment.	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A	I certify this waste/material meets all requirements of legitimate recycling of hazardous secondary materials under 40 CFR 260.43 and/or I am complying with the conditions for generators using the verified recycler exclusion.	
<p>I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.</p>			
Print Name	Signature	Title	Date



WASTE/MATERIAL PROFILE FORM

Profile #:

Uniform Radioactive Waste Acceptance Supplement

Generator Information

1. Generator Name: IWAG	2. EPA ID #: WAD991281874
3. Site Address: Kahlotus Road and Hwy12, Pasco WA 99301	

Radioactive Material Description & Site Waste Acceptance Capabilities

Radionuclides in the Waste Stream (Please check all that apply)	Waste Concentration (pCi/g)	Site Permit Limits (all values in pCi/g unless otherwise specified)			
		USEI	USEM	USET	USEN
<input checked="" type="checkbox"/> Source Material (any Uranium and/or Thorium) Do you know if the source material is: <input checked="" type="radio"/> Natural Uranium / Thorium ^{1,2} <input type="radio"/> Depleted Uranium ³ , or <input type="radio"/> Refined Uranium ⁴	(Enter U & Th concentrations) U + Th < 0.05% by weight, see attached analytical and MSDS	<0.05% by weight (500 ppm) ⁵	<0.05% by weight (500 ppm) ⁵	<0.05% by weight (500 ppm) ⁵	<0.05% by weight (500 ppm) ⁵
<input type="checkbox"/> Radium-226 (Ra-226)		500/1500 ⁶	50	30 ⁷	5
<input type="checkbox"/> Radium-228 (Ra-228)		500/1500 ⁶	50	30 ⁷	(Note)
<input type="checkbox"/> Lead-210 (Pb-210)		1500	260	150	N/A ⁸
<input type="checkbox"/> Potassium-40 (K-40)		818 ⁹	Not Specified	818 ⁹	818 ⁹
<input type="checkbox"/> Exempt Byproduct Material		Per exemption ¹⁰	Per exemption ¹⁰	Per exemption ¹⁰	Per exemption ¹⁰
<input type="checkbox"/> Special Nuclear Material		3,000 ¹¹	N/A	N/A	N/A
<input type="checkbox"/> Accelerator-Produced Material		<10mR/hr ¹²	Per Approval	Per Approval	N/A
<input type="checkbox"/> Specifically Exempted Waste		3,000 ¹¹	N/A	N/A	N/A

1. Natural Uranium and Thorium means all parent and progeny concentrations are as found in nature and considered to be in equilibrium.
2. Natural Uranium contains U-234, U-235, and U-238. Natural Thorium contains Th-228, Th-230, and Th-232
3. Depleted Uranium contains U-235 at <0.71% by weight.
4. Refined Uranium refers to waste forms that have undergone chemical separation where the equilibrium state between the uranium parent and its decay chain has been disrupted.
5. Unimportant Quantity of Source Material General Exemption in 10CFR40.13(a) is ≤ 500 ppm U + Th. The pCi/g concentrations provided are the 500 ppm equivalents for U-238 and Th-232. A sum of fractions (SOF) must be performed for U and Th with a result ≤ 1.0.
6. USEI limit is for Ra-226+Ra-228 combined. 500 pCi/g is for bulk loads, up to 1500 pCi/g requires a sealed IP-1 package.
7. USET limits is for Ra-226 or Ra-228. See TCEQ regulations for other NORM exemptions.
8. USEN may not accept Pb-210
9. K-40 may not be enriched beyond its natural concentration.
10. Please complete Radioactive Waste Supplement Form for Exempted Products, Devices, or Items.
11. US Ecology Idaho only. Sum of all nuclides. Please complete Supplement Form for USEI.
12. US Ecology Idaho only. Please complete Supplement Form for USEI.

Certification Statement

I certify that the contents of the package(s) being shipped are not licensed or regulated at the point of generation under the Atomic Energy Act of 1954, as amended, by the US Nuclear Regulatory Commission, an Agreement State, or the US Department of Energy.

Print Name: **Signature:**

Title: **Company:**

Date:



<p>Instructions – This supplement form is provided for any product, device, or item containing radioactive material that has a general licensing exemption provided in either Federal or State regulations. Please list all relevant products, devices, or items in the section below. Links to the lists of exemptions are also provided for your reference.</p>	<p>References for Federal and State Exemptions USEI: USEI Waste Acceptance Criteria USEM: USEM Waste Acceptance Criteria USEN: USEN Waste Acceptance Guidelines USET: USET Waste Acceptance Guidelines</p>
--	---

Check if any additional inventory information is attached in lieu of listing inventory below.

Line	Name or Type of Product, Item, or Device <i>(Fill out new line for EACH different type)</i>	Total Number in Shipment	Radionuclide Contained	Activity Per (μCi)	Disposal Site	Cited Regulatory Exemption
1.	<i>Example: Ionization Smoke Detectors</i>	10	Am-241	1.0	USEI	10 CFR 30.15
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						

Notes:
 1. The generator must provide an inventory of for all Products, Items, and Devices including activity, by isotope, for each container.

Particle Accelerator Produced Radioactive Material (NARM) (USEI WAC Table C.3)

1. Was the waste generated in a particle accelerator? Yes No

Estimated inventory of activity, by isotope, for each container

Radionuclide	Concentration (pCi/g)	Radionuclide	Concentration (pCi/g)	Radionuclide	Concentration (pCi/g)

Notes

- Dose rate may not exceed 10 mrem/hr at any point on the package surface.
- Containers must be **at least 90% full**.

Materials Specifically Exempted by the NRC or NRC Agreement State (USEI WAC Tables C.4b or C.4c)

1. Is the material approved for disposal in accordance with 20.2008(b) or equivalent Agreement State regulation? Yes No
(If yes, provide a copy of the exemption)

2. Has the waste been approved by the NRC or an Agreement State for alternative disposal in accordance with 10CFR 20.2002 or an Agreement State equivalent regulation? (If yes, provide a copy of the approval request, NRC exemption, and applicable SER/FONSI) Yes No

3. Was the material approved for alternate disposal via a decommissioning plan or license amendment? Yes No
(If yes, provide a copy of the license or plan.)

4. Is the material acceptable under USEI Table C.4b as not licensed or regulated by the NRC or Agreement State under the Atomic Energy Act? (If yes, provide documentation that the radioactive material is unlicensed) Yes No

5. Has the material been "Released from Radiological Control" from a US Department of Energy Site in accordance with a DOE Order 458.1 Authorized Limit? (If yes, provide a copy of the Authorized Limit package and applicable DOE approval letter) Yes No

6. Has the material been exempted, released, or otherwise authorized for non-licensed disposal by the US Department of Defense under its AEA Section 91(b) authority? (If yes, provide a copy of the DoD approval letter) Yes No

Exempt Material	WAC Limit
Byproduct Material (Exempt per 10CFR30.11, A/S equivalent, US DOE, US DoD)	Sum of all Isotopes <3,000 pCi/g <input type="text"/>
Source Material (Exempt per 10CFR40.14, A/S equivalent regulation, US DOE, or US DoD) Sum of all isotopes < 3,000 pCi/g. If waste contains <u>both uranium and thorium</u> , a sum of fractions (SOF) must be calculated using the limits provided below: <ul style="list-style-type: none"> <u>Natural Uranium (in equil): U-238 Limit = 214 pCi/g</u> (U-238 * 14 decay progeny < 3,000 pCi/g) <u>Depleted Uranium: U-238 Limit = 877 pCi/g</u> (Only contains U-238, Th-234, Pa-234m, U-235, and U-234) <u>Natural Thorium (in equil): Th-232 Limit = 272 pCi/g</u> (Th-232 * 11 decay progeny < 3,000 pCi/g) 	Use Space Below for U + Th SOF Calculations: <div style="border: 1px solid black; height: 150px; width: 100%;"></div>
Special Nuclear Material (Exempt per 10CFR 70.17, A/S equivalent regulation, US DOE, or US DoD)	Sum of all Isotopes <3,000 pCi/g <input type="text"/>

For US Ecology Idaho use only:

Which of the USEI WAC Tables apply to this profile? (Check all that apply)	Waste Type (check only one)
<input type="checkbox"/> (Table C.1) Unimportant Quantities of Source Material Uniformly Dispersed in Soil or other Media <input type="checkbox"/> (Table C.2) NORM other than Uranium and Thorium Uniformly Dispersed in Soil or Other Media <input type="checkbox"/> (Table C.3) Particle Accelerator Produced Radioactive Material (NARM) <input type="checkbox"/> (Table C.4a) NRC Exempted Products, Devices, or Items <input type="checkbox"/> (Table C.4b) Materials Specifically Exempted by the US NRC or an NRC Agreement State <input type="checkbox"/> (Table C.4c) Materials Released by Other Government Agencies	<input type="radio"/> FUSRAP <input type="radio"/> RADIOACTIVE NON-FUSRAP <input type="radio"/> RADIOACTIVE EXEMP ACCEL

Pasco Sanitary Landfill NPL Site

Zone A Removal Action

Engineering Design Report

Appendix C

Waste Handling, Characterization,

and Disposal Plan

Attachment C.2

Drum and Container Assessment

and Sampling Procedures

DRAFT FINAL

Attachment C.2

Drum and Container Assessment and Sampling Procedures

The procedures outlined below represent the Standard Operating Procedures (SOPs) that will be used for assessing, opening, and sampling containers or tanks. Containers may include drums, buckets, boxes, totes, sacks, and roll-off boxes. Each container type discovered may require a different assessment and sampling procedure. Operating procedures may be modified during the course in accordance with the contractor's site-specific Health and Safety Plan (HASP).

ATMOSPHERIC AND VISUAL INSPECTION

Atmospheric Monitoring

Before opening of drums and containers takes place, atmospheric and area monitoring will be performed, consisting of the following steps:

1. **Chemical Hazards:** Chemical hazards will be assessed using personnel monitoring instruments capable of detecting CO, O₂, H₂S, and LEL%. A photoionization detector for detecting volatile organic compounds will be used to detect the presence of organic vapors gases.
2. **Alpha/Beta Radiation Scan:** An alpha/beta radiation scan will be performed on each drum, using a Ludlum Model 3001-2 Survey Meter with pancake probe, or equivalent for human health and protection.
3. **Gamma Radiation Dose Survey:** A dose survey will be performed concurrent with the chemical hazard assessment to detect the presence of gamma radiation dose levels above background levels typical of Pasco, Washington. A Ludlum Model 3001-2 Survey Meter or equivalent will be used for this action.
4. **Thermal Imaging:** A thermal imaging camera will be used to scan the exposed surface of the excavation to detect elevated levels of heat or heat being generated by the buried containers.

Visual Inspection of Drums, Containers, and Tanks

Drums will be visually assessed for indications that the materials inside may be radioactive, explosive, corrosive, toxic, flammable, or lab packed. Visual inspection will seek to identify the following:

1. Symbols, words, or markings
 - A. Hazard warning labels, markings, placards that are affixed, branded, stamped, and embossed on a container or a tank
 - B. Manufacturer advertisement labels and markings that are affixed, branded, stamped, and embossed on a container or a tank
2. Signs of deterioration such as corrosion, rust, or leaks

3. Indications that the container is under pressure, such as swelling or bulging
4. Container types: steel, stainless steel, aluminum, plastic, wood, woven fabric, and composite containers; discovery of a small container overpacked into a larger container; typical contents associated with container types:
 - A. Polyurethane: acids/bases
 - B. Polyvinyl chloride/lined: acids/bases or otherwise hazardous material
 - C. Exotic metals: usually contain dangerous materials
 - D. Lab packs and overpacks: reactive chemicals, samples, incompatibles, radioactive, and corrosives
5. Configuration of drumhead:
 - A. Bunged: designed for liquids
 - B. Flat top removable: designed for solids
6. Information on the generator or owner of the drums
7. Conditions in the immediate vicinity of the container; inspection of conditions including the following:
 - A. Crystalline material on or around the containers that could indicate shock-sensitive material
 - B. Material leaked or spilled from the containers onto the ground that might give a clue as to what may be in the drum.
 - C. Visible colors and stains
 - D. Chemical reactions in progress-bubble/fizzle/heat/ice/gaseous release
 - E. Slosh, clunk, and rattle sounds of materials moving inside of a container/tank
 - F. Visible chemical reactions that occur when the container/tank is uncovered and exposed to air
 - G. Container integrity that is compromised when handled causing a release and chemical reaction

The information will be entered into the DrumTrack database. DrumTrack is a computer application for recording field instrument readings taken during the initial screening; a visual description of the drum, container, or tank and its contents; and a description of any labeling, logos, or warning information on the drum, as well as entering HazCat® data results. The grid location of the drum will additionally be recorded on the field data sheet.

Discovery of Storage Tanks

If a tank is encountered during excavation and removal activities, the tank will be inspected, managed, and sampled in a similar manner as outlined for drums and containers. Before moving

the tank, an inspection will be performed for evidence of the tank having been accepted at the landfill and disposed of waste, or evidence of associated piping or other evidence that it was formerly used on the property and abandoned in place (i.e., indicating possible classification as an abandoned underground storage tank [UST] system).

In the event that the tank appears to be an abandoned UST system, or leaking UST (LUST), the Washington State Department of Ecology (Ecology) will be notified according to required reporting protocol (within 24 hours from discovery) that a UST/LUST has been discovered and that contingency action is being implemented.

If the UST is not leaking, the Project Team may proceed in decommissioning the UST and dispose of it properly according to Ecology protocols.

If the UST is leaking, the Project Team will immediately stop the leak or take appropriate actions to eliminate or reduce fire, explosion, or vapor hazards. The General Contractor (GC) will coordinate with the Resident Engineer (RE) to empty the UST and decommission according to Ecology protocols and file a Site Characterization Report to Ecology.

PRE-SAMPLE CONSIDERATIONS

During the initial inspection, any suspicious-looking drums (e.g., swollen, or customized containers, or drums labeled as containing hazardous materials or explosives) must be clearly marked and segregated for special handling. Drums may be deteriorated to the point that they have holes or are crushed to some degree. Drums that leak must be overpacked, and the surrounding soil containing released drum contents must also be contained.

Extreme care must be exercised in opening intact drums or other sealed containers in which the contents are unknown or known to be dangerous to sampling personnel. Drums must be grounded prior to opening or sampling. An intact drum with unknown contents that has a badly rusted bung or cover bolt must be entered with a non-sparking penetrating device operated remotely or using a similar method. Hand-operated, non-sparking tools may be used to penetrate an intact drum, if the contents of the drum are known and acceptable for such activity.

As intact drums are removed from the excavation, they will be segregated and staged within the temporary structure as appropriate; possible groupings include the following:

- Drums with labeling and/or distinctive markings
- Intact Drums
- Drums suspected of containing liquids
- Zircon casting sand drums
- Drum remnants and empty drums

Opening Drums and Containers

The following general procedures will be conducted in areas where drums or containers are being opened:

1. Currently, the known listing of chemical containers at the site do not include explosive or shock-sensitive substances. In the event that explosive or shock-sensitive substances are encountered, a separate work plan will be developed to properly address and manage any and all such materials.
2. Material handling equipment shall be selected, located, and operated to prevent ignition of vapors released during opening procedures.
3. Employees not directly involved in the opening procedures will be kept at a safe distance.
4. Non-sparking tools and equipment will be used for the project duration within the temporary structure or other identified opening and bulking areas.
5. Drums, containers, and tanks shall be opened to safely relieve excess pressure.
6. Employees shall not stand on or work from drums or containers.

After the initial opening and visual inspection of the drum contents, drums will remain within the temporary structure for preliminary sorting and sampling. The sampling procedures for each class are discussed in the following subsections. As the sampling is being performed, a survey of the open drum will be conducted.

Opening Shock Sensitive, Air-Reactive, or Water-Reactive Drums

Currently, the known listing of chemical containers at the site does not include shock-sensitive or reactive wastes. If these wastes are encountered, the following special precautions should be followed:

1. All nonessential employees shall be removed from the area of transfer.
2. Material handling equipment shall be fitted with explosion containment devices or protective shields to protect operators.
3. An alarm system will be used to signal the beginning and end of the procedure.
4. Continuous communications will be maintained between the employee in charge of the operation and the Health and Safety Officer during the operation.
5. Pressurized drums shall not be moved until the cause of the excessive pressure is determined and appropriate measures are implemented.

SAMPLING PROCEDURES

Waste sampling of drums, containers, and tanks will be conducted by experienced personnel specifically trained for the task. The sampling will be conducted at the drum staging pad or the drum-sampling tray within the temporary structure. The methods and equipment used for sampling vary with the form and consistency of waste to be sampled. Samples for the

determination of the physical and chemical composition of the waste be collected in a similar manner to the sample collection methods described in SW-846 Chapter 9 for sampling containers, or using appropriate ASTM International (ASTM) methods. Generalized procedures are described in the proceeding sections.

Consideration used to determine a representative sample collection for tanks, if encountered, will be similar to those described for drums.

If different phases are present in the drum, container, or tank, each phase will be sampled separately for analysis. A sufficient volume of sample will be collected to perform all required tests. At a minimum, one sample will be collected from each excavated drum, container, or tank for each phase present.

Personal protective equipment, as specified within the site-specific HASP, will be worn or used at all times. Air monitoring will be conducted in accordance with the HASP to identify the need to upgrade or downgrade respiratory protection during sampling.

Sampling Solids

1. Collect a sufficient quantity of a sample that is representative of the waste from the top to bottom of the drum, container, or tank for Hazard Categorization (HazCat) and offsite analytical testing, as applicable.
2. Sample solids with a stainless-steel knife, spoon, trowel, auger, or similar tool. If necessary, sample hardened resins with a hammer and chisel.
3. Transfer the sample material into appropriate bottle or bottles.
4. Covers, bungs, etc. must be replaced upon completion of sampling. Punctures for sampling must be resealed using putty or aluminum foil and duct tape.
5. Change outer gloves used during sampling between each drum, container, or tank.
6. Complete the field sampling data sheet and chain-of-custody form.
7. Transport sample to onsite HazCat laboratory or IWAG-approved analytical laboratory for analysis employing chain-of-custody procedures.

Sampling Liquid or Sludge

1. Collect a sufficient quantity of sample using a sampling thief or alternate device if more applicable for the contents (i.e., composite liquid waste sampler [coliwasa], sludge judge, bomb sampling, dipstick, or bailer) for HazCat and offsite analytical testing.
2. If more than one phase of material is identified, sample each phase separately with sufficient quantity for HazCat, compatibility testing, and laboratory analytical testing. If no phasing is apparent, collect sample from the entire depth of waste.
3. Transfer the sample material into appropriate bottle or bottles.

4. Covers, bungs, etc. must be replaced upon completion of sampling. Punctures for entry must be resealed using putty or aluminum foil and duct tape.
5. Change outer gloves used during sampling between each drum, container, or tank.
6. Complete the field sampling data sheet and chain-of-custody form.
7. Transport sample to onsite HazCat laboratory or IWAG-approved analytical laboratory for analysis employing chain-of-custody procedures.

Sampling Bulked Solid Waste

1. Collect five-point composite sample from roll-off container of bulked solid waste. Composite sample will be determined based upon disposal facility requirements and following approval by the IWAG RE.
2. Transfer the sample material into appropriate bottle or bottles.
3. Covers must be replaced upon completion of sampling.
4. Change outer gloves used during sampling between each drum, container, or tank.
5. Complete the field sampling data sheet and chain-of-custody form.
6. Transport sample to onsite HazCat laboratory or IWAG-approved analytical laboratory for analysis employing chain-of-custody procedures.

Sampling Bulked Liquid

1. Sample liquid storage tanks, wastewater storage tanks, or drummed liquid storage tanks.
2. Collect a sufficient quantity of sample using a sampling thief or alternate device if more applicable for the contents (i.e., composite liquid waste sampler [coliwasa], sludge judge, bomb sampling, dipstick, or bailer) for HazCat® and offsite analytical testing.
3. Transfer the sample material into appropriate bottle or bottles.
4. Covers, sample ports, etc. must be replaced upon completion of sampling.
5. Change outer gloves used during sampling between each drum, container, or tank.
6. Complete the field sampling data sheet and chain-of-custody form.
7. Transport sample to onsite HazCat laboratory or IWAG-approved laboratory for analysis employing chain-of-custody procedures.

Following sample collection, wastes pending analysis will be marked as pending analysis and will remain in the Container Management Area.

ANALYTICAL LABORATORIES

Based on HazCat analysis and offsite disposal facility requirements, any necessary follow up waste analysis testing will be performed by the following Ecology-accredited laboratories:

- Pace Analytical Services, LLC
Minneapolis, MN
Laboratory ID C486
- Eurofins TestAmerica, St Louis
Earth City, MO
Laboratory ID: C592

Washington state laboratory accreditation certificates can be provided upon request. Other laboratories accredited to perform waste analysis testing methods may be used (such as ALS Environmental) as needed.

HAZCAT METHODS

HazCat methods will primarily be performed on site, with follow up testing on a portion of the samples in offsite laboratories. Tests to be performed as described in Table C.1.

ANALYTICAL METHODS

Laboratory analysis will be conducted using USEPA SW-846 test methods and procedures and at the recommended frequencies approved by the treatment, storage, and disposal facility (TSDF) waste characterization protocol. Waste will be assigned to a reference profile following atmospheric, visual, and HazCat analysis. Additional laboratory analysis will be dependent upon the reference profile group the waste is assigned to. Table C.2 describes the laboratory analysis required for waste profiling and disposal by reference profile group.

Laboratory analysis will generally be performed on a standard laboratory turnaround time.

SAMPLE CUSTODY AND DOCUMENT CONTROL

The following documentation procedures will be used during sampling and analysis to provide chain-of-custody control during transfer of samples from collection through storage. Recordkeeping documentation will include use of the following:

1. Field sampling data sheets and a log of samples collected and shipped off site or sent to onsite HazCat laboratory to document sampling activities in the field
2. Labels to identify individual samples
3. Chain-of-custody records to document analyses to be performed on each sample submitted

Drum Identification and Documentation

In the field, the sampler will record information into DrumTrak for each sample collected as described above.

The database for drums or containers that are intact, contain liquids or solids, containing casting residue sands, or have labels and/or markings shall include, as a minimum, the following for each drum:

1. Drum or container identification number
2. Excavation location (i.e., area, row, and grid)
3. Data on alpha/beta/gamma radiation
4. Photographs
5. Visual inspection results for each drum
6. Drum/waste category (e.g., debris or empty, intact containing liquids, casting sands)
7. Date of drum removal from excavation
8. Overpack or container used and type
9. Date of sample collection
10. Date of HazCat
11. HazCat ID if different from Drum ID
12. HazCat results utilizing onsite laboratory
13. Sample name
14. Laboratory analytical methods and results
15. Laboratory work order or batch number associated with the drum's analytical results
16. Waste characterization information
17. Disposal or treatment facility

The database for roll-off containers containing bulked drum waste, debris, and empty drums (and do not contain labels and/or markings) shall include, as a minimum, the following:

1. Date(s) of removal from excavation
2. Excavation location(s) (i.e., area, row, and grid) where material was removed from
3. Drum/waste category (i.e., debris or empty)
4. Description
5. Roll-off container number
6. Number of containers in the roll-off container

7. Sample name(s)
8. Date(s) of sample collection
9. Date of HazCat
10. HazCat ID if different from roll-off container number
11. HazCat results utilizing onsite laboratory
12. Laboratory work order or batch number associated with the roll-off container's analytical results
13. Waste characterization information
14. Disposal or treatment facility

Sample Labeling

A label must be affixed to all sample containers to prevent misidentification, and at a minimum, must include the following:

- Client name and project number
- A unique sample name (alphanumeric code)
- Date and time of collection
- Preservative

A unique alphanumeric code or sample name will be used to identify each collected sample and trip blank. This system provides a tracking number to allow retrieval and cross referencing of sample information.

Field duplicates will not be required for waste classification samples.

Chain-of-Custody Records

Chain-of-custody forms will be completed for all samples collected during the program. Chain-of-custody forms will document the transfer of sample containers.

The chain-of-custody form, completed at the time of sampling, will contain, but not be limited to, the sample medium, sample name, date and time of sample collection, number of containers, analyses to be performed, and the name of the sampler(s). The chain-of-custody document will be signed, timed, and dated by the sampler when transferring the samples. Each sample cooler being shipped to the laboratory will have an associated chain-of-custody form. Custody seals will be placed on each cooler. The cooler will then be sealed with packing tape. All samples should be delivered to the laboratory by same day or overnight delivery.

The chain-of-custody form will be distributed as follows: The GC's field staff (Quality Assurance/Quality Control [QA/QC] Officer) will maintain a copy while another copy will be

enclosed in a waterproof envelope within the cooler with the samples. The laboratory, upon receiving the samples, will sign and date the form and send a copy to the QA/QC Officer. The laboratory will retain a copy for their records. A copy will be included with the data deliverable package. The shipper's copy will be filed in the field project folder located in the project office or will be scanned and stored electronically.

Upon receipt of the cooler at the laboratory, the Sample Custodian will inspect the shipping cooler and the custody seal and will document the internal temperature of the cooler. The Sample Custodian will note the condition of the cooler and the custody seal as part of the sample receiving procedures.

If damage or discrepancies are noticed (including sample temperature exceedances), they will be recorded. Any damage or discrepancies will be recorded and reported to the GC and/or RE sample manager.

Sample Documentation

Project documentation shall be maintained on site and consist of the following:

1. Project related sampling and quality assurance plans
2. Project logbooks
3. Field data records
4. Sampling records including sample identification
5. Chain-of-custody records
6. Photographs, maps, drawings, etc.

Copies of the sample documentation listed above, HazCat and laboratory data, and summary reports documenting sample collection, analysis, and laboratory results will be retained electronically.

Pasco Sanitary Landfill NPL Site

Zone A Removal Action

Engineering Design Report

Appendix C

Waste Handling, Characterization,

and Disposal Plan

Attachment C.3

Potential Waste Transportation Haul Routes

DRAFT FINAL



Imagery ©2019 Landsat / Copernicus, Imagery ©2019 TerraMetrics, Map data ©2019 5 mi

Dietrich Rd

Washington 99301

Get on US-12 E in Pasco from Dietrich Rd

- 4 min (1.8 mi)
- ↑ 1. Head southwest on Dietrich Rd toward N Commercial Ave
- 0.7 mi
- ↶ 2. Turn left onto N Commercial Ave
- 0.2 mi
- ↷ 3. Turn right onto Pasco Kahlotus Rd
- 0.1 mi
- ↑ 4. Continue onto E Lewis St
- 0.3 mi
- ↶ 5. Turn left to merge onto US-12 E
- 0.6 mi

Follow US-12 E, US-730 W and I-84 W/US-30 W to Beech St in Arlington. Take exit 137 from I-84 W/US-30 W

-  6. Merge onto US-12 E 1 h 28 min (85.9 mi)
-
-  7. Slight right (signs for US 730 W/Pendleton) 14.5 mi
-
-  8. Slight right onto US-730 W 0.2 mi
-  [Entering Oregon](#)
-
-  9. Take the Interstate 84 W/US 30 W ramp to Boardman/Portland 41.0 mi
-
-  10. Merge onto I-84 W/US-30 W 0.3 mi
-
-  11. Take exit 137 toward OR-19/Arlington Condon 29.2 mi
-
- 0.6 mi

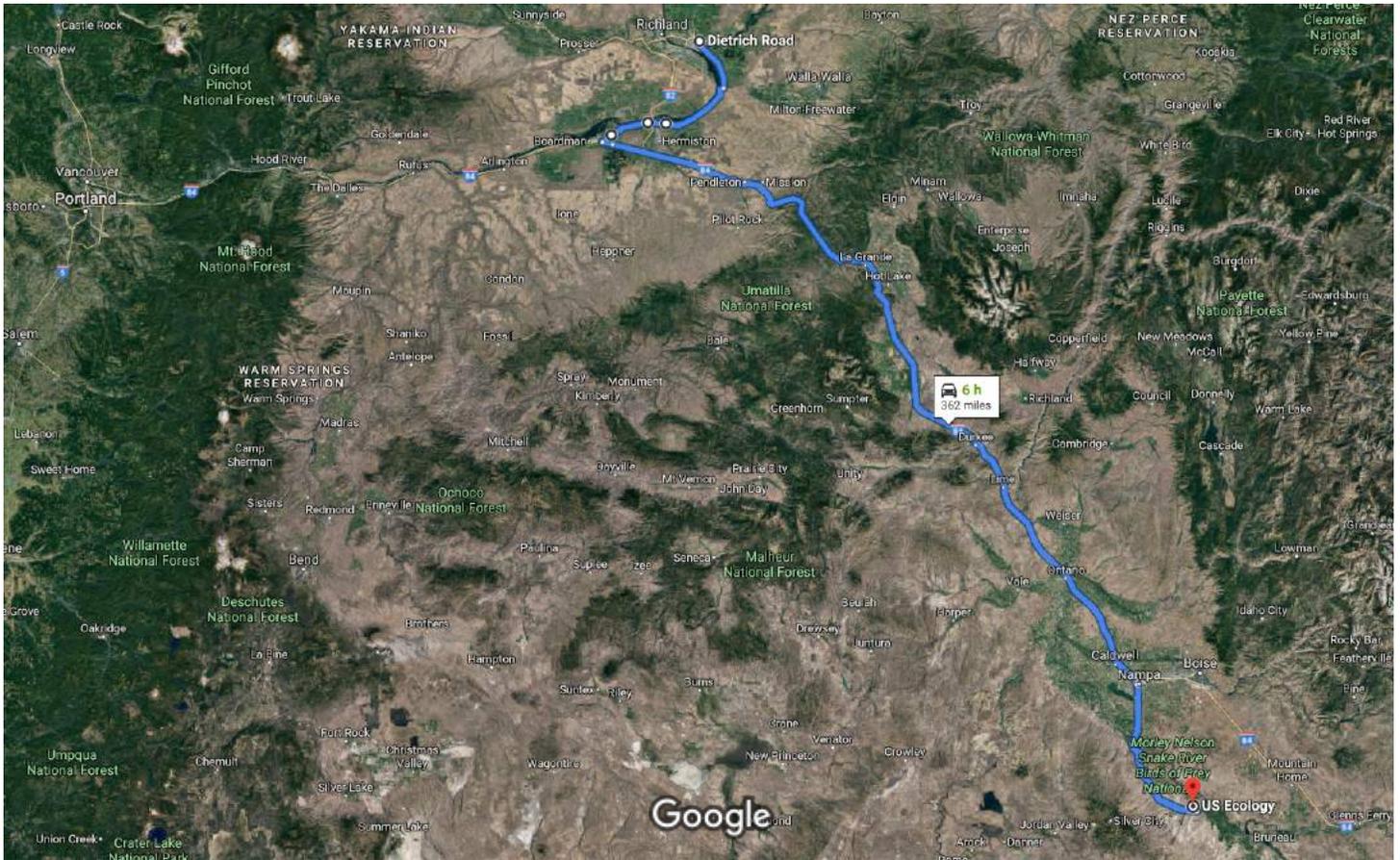
Follow OR-19 S to Cedar Springs Ln

-
- 16 min (12.0 mi)
-  12. Continue onto Beech St 417 ft
-
-  13. Turn left onto Cottonwood St 0.2 mi
-
-  14. Turn left onto OR-19 S/Locust St (signs for Condon/John Day/State Police) 6.8 mi
-  [Continue to follow OR-19 S](#)
-
-  15. Turn right onto Cedar Springs Ln 5.0 mi
-

Waste Management - Chemical Waste Management of the Northwest

17629 Cedar Springs Ln, Arlington, OR 97812

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.



Imagery ©2019 Landsat / Copernicus, Imagery ©2019 TerraMetrics, Map data ©2019 Google 20 mi

Dietrich Rd

Washington 99301

Get on I-84 E/US-30 E in Morrow County from US-12 E and US-730 W

1 h 6 min (57.9 mi)

- ↑ 1. Head southwest on Dietrich Rd toward N Commercial Ave
0.7 mi
- ↶ 2. Turn left onto N Commercial Ave
0.2 mi
- ↷ 3. Turn right onto Pasco Kahlotus Rd
0.1 mi
- ↑ 4. Continue onto E Lewis St
0.3 mi
- ↶ 5. Turn left to merge onto US-12 E
15.1 mi
- ↷ 6. Slight right (signs for US 730 W/Pendleton)
0.2 mi

- ↗ 7. Slight right onto US-730 W
i Entering Oregon
_____ 41.0 mi
- ↶ 8. Keep left
_____ 0.2 mi
- ⤴ 9. Use the right lane to take the Interstate 84 E/US 30 E ramp to Pendleton
_____ 0.2 mi

Follow I-84 E to Northside Blvd in Nampa. Take exit 35 from I-84 E

- _____ 3 h 48 min (252 mi)
- ⤴ 10. Merge onto I-84 E/US-30 E
_____ 3.3 mi
 - ↗ 11. Take exit 171 toward Paterson Ferry Rd
_____ 0.2 mi
 - ↘ 12. Turn right toward Paterson Ferry Rd
_____ 0.1 mi
 - ↑ 13. Continue straight onto Paterson Ferry Rd
_____ 0.3 mi
 - ⤴ 14. Turn left onto the Interstate 84 W/US 30 W ramp to Boardman
_____ 0.3 mi
 - ⤴ 15. Merge onto I-84 W/US-30 W
_____ 2.5 mi
 - ↗ 16. Take exit 168 for US-730 toward Irrigon
_____ 0.3 mi
 - ↶ 17. Turn left onto US-730 W
_____ 197 ft
 - ↶ 18. Keep left
_____ 0.2 mi
 - ⤴ 19. Use the right lane to take the Interstate 84 E/US 30 E ramp to Pendleton
_____ 0.2 mi
 - ⤴ 20. Merge onto I-84 E/US-30 E
i Continue to follow I-84 E
i Entering Idaho
_____ 245 mi
 - ↗ 21. Take exit 35 for Northside Blvd
_____ 0.2 mi

Follow ID-45 S and ID-78 E to Lemly Rd in Owyhee County

_____ 1 h 1 min (52.2 mi)

- 22. Turn right onto Northside Blvd
[Pass by Denny's \(on the right\)](#)

1.0 mi
- ↑ 23. Continue straight onto N Yale St

0.4 mi
- ↑ 24. Continue onto 7th St S

0.5 mi
- 25. Turn right onto ID-45 S/12th Ave S
[Continue to follow ID-45 S](#)
[Pass by Wendy's \(on the left in 0.8 mi\)](#)

17.1 mi
- ↙ 26. Slight left to stay on ID-45 S

0.4 mi
- ↑ 27. Continue onto ID-78 E

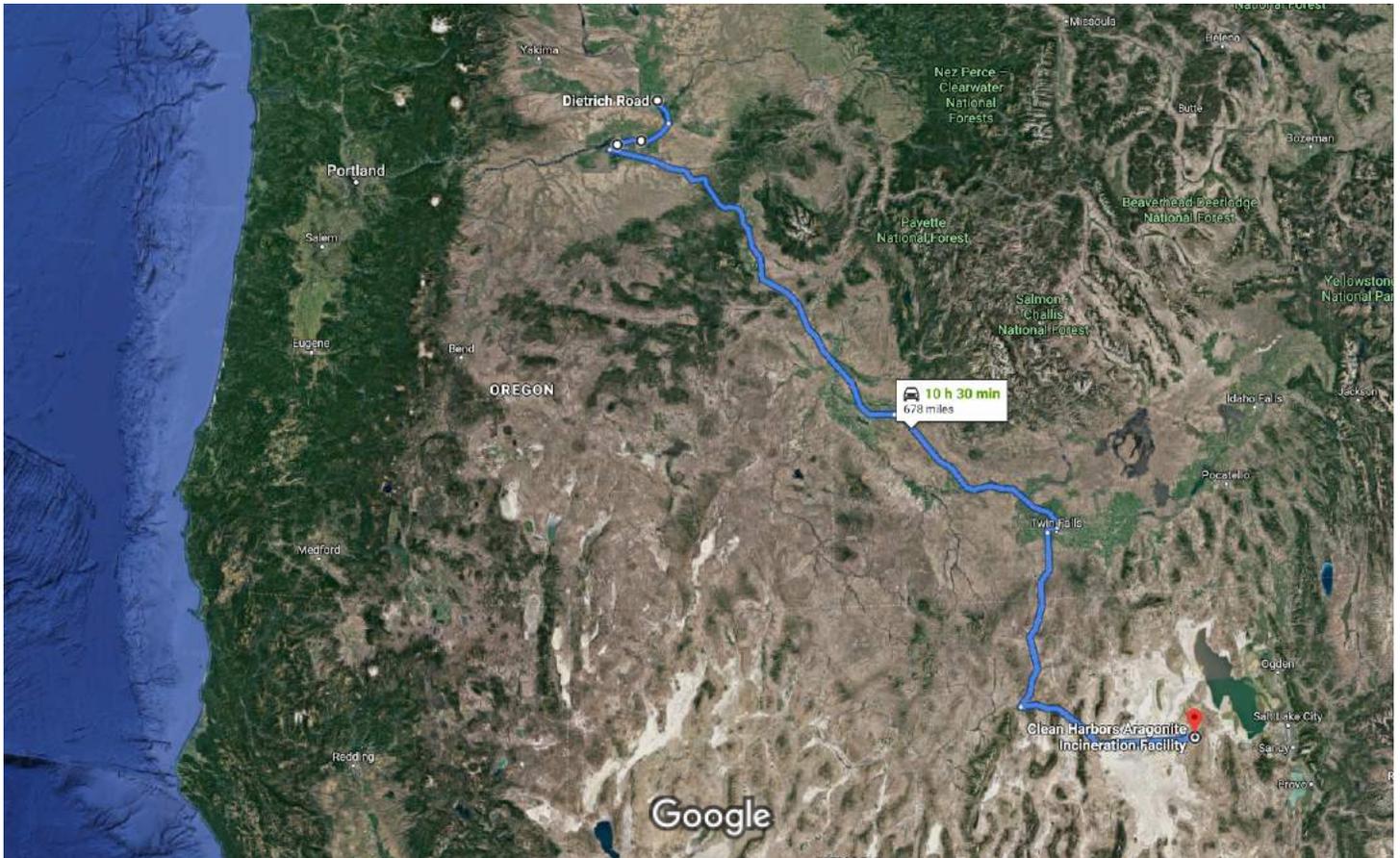
31.1 mi
- ↶ 28. Turn left onto Lemly Rd

1.6 mi

US Ecology

20400 Lemley Rd, Grand View, ID 83624

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.



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50 mi

Dietrich Rd

Washington 99301

Get on I-84 E/US-30 E in Morrow County from US-12 E and US-730 W

1 h 6 min (57.9 mi)

- ↑ 1. Head southwest on Dietrich Rd toward N Commercial Ave
0.7 mi
- ↶ 2. Turn left onto N Commercial Ave
0.2 mi
- ↷ 3. Turn right onto Pasco Kahlotus Rd
0.1 mi
- ↑ 4. Continue onto E Lewis St
0.3 mi
- ↶ 5. Turn left to merge onto US-12 E
15.1 mi

-  6. Slight right (signs for US 730 W/Pendleton)
----- 0.2 mi
-  7. Slight right onto US-730 W
 [Entering Oregon](#)
----- 41.0 mi
-  8. Keep left
----- 0.2 mi
-  9. Use the right lane to take the Interstate 84 E/US 30 E ramp to Pendleton
----- 0.2 mi

Follow I-84 E to US-93 S in Jerome County. Exit from I-84 E

----- 5 h 35 min (383 mi)

-  10. Merge onto I-84 E/US-30 E
 [Continue to follow I-84 E](#)
 [Entering Idaho](#)
----- 259 mi
-  11. Keep right to stay on I-84 E
----- 123 mi
-  12. Take the exit toward US-93 S
----- 0.8 mi
-  13. Keep right at the fork and merge onto US-93 S
----- 0.7 mi

Get on I-80 E in Wells from US-93 S

----- 1 h 57 min (120 mi)

-  14. Merge onto US-93 S
 [Pass by Chili's Grill & Bar \(on the left in 2.3 mi\)](#)
----- 2.6 mi
-  15. Turn right onto US-93 S/4100 N
----- 8.1 mi
-  16. US-93 S turns slightly right and becomes US-93 S
 [Entering Nevada](#)
----- 109 mi
-  17. Turn left to merge onto I-80 E toward Salt Lake
----- 0.3 mi

Follow I-80 E to your destination in Tooele County. Take exit 56 from I-80 E

----- 1 h 36 min (115 mi)

-  18. Merge onto I-80 E
 [Entering Utah](#)
----- 114 mi
-  19. Take exit 56 toward Aragonite
----- 0.3 mi

-  20. Turn right onto Aragonite Rd
 Destination will be on the left

4 min (2.4 mi)

Clean Harbors Aragonite Incineration Facility

11600 North Aptus Road, Grantsville, UT 84029

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