

ATTACHMENT 1

SECURITY AND MAINTENANCE PLAN

POST- CLOSURE SECURITY AND MAINTENANCE PLAN

I.A. Purpose and Scope

The M-136 LTTAs, and Photographic Waste Discharge Sites at M-508 and M-636 are all Hazardous Waste Management Units (HWMUs) that have been closed with waste in-place. Post-closure security and maintenance requirements apply to these sites in accordance with R315-8-2.5 and R315-8-7 (which incorporates by reference 40 CFR 264.110 – 264.120). The security and maintenance requirements of this plan apply to the closed LTTAs and Photographic Waste Discharge Sites as outlined below.

I.B. Security

The work performed at the ATK Launch Systems, Promontory facility primarily involves Department of Defense and NASA contracts; therefore, comprehensive security agreement measures have been instituted. These security measures include both a twenty-four hour surveillance system and an artificial barrier around the facility to minimize the possibility of unknown entry of livestock or personnel.

I.B.1. Surveillance System

Entry onto the facility is controlled at gates that are maintained by a trained security force. The security force also provides patrol, escort, and other activities within the facility. All plant entrances are manned by a minimum of one security officer twenty-four hours per day, every day. All other gates are locked and only used when authorized by attending Security. All employees entering the facility must show identification badges at the gate and wear them in plain sight throughout the day. All visitors and vendors are required to wear special identification badges.

I.B.2. Artificial Barrier

There are artificial or natural barriers surrounding the entire plant. The primary barrier consists of a chain link and barbed wire fence. The chain link fence runs along Highway 83 until it runs into the gully formed by Blue Creek just west of building M-46. A natural barrier is provided by the Blue Creek gully which is approximately 15 feet deep with near vertical sides. This barrier extends for approximately 8,000 feet to a five-foot, four-strand barbed wire fence. This fence extends to the north, changes to chain link, and runs around the north end of the Plant. The chain link fences are seven feet high and topped with barbed wire. This

fence is continued by a five-foot, four-strand barbed wire fence, which completes the primary barrier by encircling North Plant, Test, and Space Operations. Plant III is encircled by a five-foot, four-strand barbed wire fence and also has controlled access at the main entrance. Each hazardous waste management area also has an artificial barrier as described in the facility's Hazardous Waste Storage Permit.

In addition to the barrier described above, a five-foot, four strand barb wire fence surrounds the M-136 LTTAs. Access to the area is controlled by a gate which is locked when no one is present.

I.B.3. Warning Signs

Signs which read "DANGER, UNAUTHORIZED PERSONNEL KEEP OUT" shall be posted at the entrance gates to the LTTA and every 100 feet along the fence surrounding the LTTA and shall be maintained throughout the post-closure care period. The signs must be legible from a distance of at least 25 feet in accordance with R315-8-2.5(c).

Signs which read "HAZARDOUS WASTE MANAGEMENT UNIT – RESTRICTIONS ON LAND USE APPLY" shall be posted at entrances and every 100 feet around the designated area of HWMUs M-508 and M-636.

I.B.4. Activity and Use Limitations

Based on an assessment of the human health risk associated with the contamination remaining at the M-508 and M-636 sites, no soil shall be removed from the surveyed confines of these areas. Use of the property at the M-136 LTTA which will disturb the integrity of the caps, containment system, or groundwater monitoring system is prohibited.

I.B.5. Deed Notices

As required by Condition III.A.2., deed notices shall be recorded with Box Elder County for the M-136 LTTAs and Photographic Waste Discharge Sites M-508 and M-636 in accordance with State Law. The notices shall contain the information as outlined in Section III.A. of this Permit. Upon receipt by the Executive Secretary of copies of the deed notices and the certifications that the notations on the deed have been recorded, the documents shall be incorporated into this Permit.

I.C. Maintenance

This section describes the maintenance requirements for the M-136 LTTAs and Photographic Waste Discharge Sites at M-508 and M-636 during the post-closure care period. These requirements are in accordance with the State of Utah Hazardous Waste Management Rules R315-8-2.5, R315-8-7 and R315-8-11.5.

I.C.1. M-136 LTTAs Post-Closure Maintenance Requirements

In accordance with R315-8-11.5, post-closure maintenance of the M-136 LTTAs consists of the three primary requirements outlined below:

- I.C.1.a. The Permittee shall maintain the integrity and effectiveness of the final cover, or caps, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, or other events.
- I.C.1.b. The Permittee shall maintain and monitor the groundwater monitoring system (as directed by Module IV of this Permit).
- I.C.1.c. The Permittee shall prevent run-on and run-off from eroding or otherwise damaging the final cover, or caps. Run-on and run-off at the M-136 Burning Grounds and LTTA caps are controlled by diversion, collection ditches and trenches. Diversion ditches direct run-on around the M-136 area. Run-off is collected in a ditch on the west end of the area which drains towards Blue Creek. The diversion and collection ditches shall be kept clean of debris and vegetation that may prevent adequate drainage. If debris or vegetation is found in these structures during inspections that may result in inadequate drainage, action shall be initiated within 72 hours to clear the drainage structures. The LTTA caps within the M-136 area are included in the ATK Launch Systems zone of engineering control.

I.C.2. M-508 and M-636 Photographic Waste Discharge Sites Post-Closure Maintenance Requirements

Post-closure maintenance of the M-508 and M-636 sites shall consist of the following primary requirements:

- I.C.2.a. The Permittee shall maintain the warning signs and other security equipment.
- I.C.2.b. The Permittee shall maintain and monitor the groundwater monitoring system (as directed by Module IV of this Permit).
- I.D. Inspection Requirements for the M-136 LTTAs

The Permittee shall inspect, throughout the post-closure care period, the

twelve M-136 LTTA caps, drainage ditches, security equipment and groundwater monitoring system as directed by Modules II and III and Attachment II of this Permit. All records of inspections and remedial actions shall be retained in the Operating Record, as indicated by Permit condition I.G.16. Repairs or corrective action for any deterioration or malfunction discovered by an inspection shall be initiated within 72 hours except for damaged security equipment. As stated in Permit Condition II.B.3., repairs to damaged security equipment shall begin within 24 hours. Repairs to security equipment shall be completed as soon as practicable, but not later than 72 hours after the problem is discovered.