DUGWAY PERMIT

MODULE VII

ATTACHMENT 18

SWMU 194
POST-CLOSURE PLAN

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LIST OF ACRONYMS, ABBREVIATIONS, AND SYMBOLS

CFR	Code of Federal Regulations
CMI	Corrective Measures Implementation
CMIR	Corrective Measures Implementation Report
CWM	Chemical Warfare Material
DPG	Dugway Proving Ground
DSHW	Divisions of Solid and Hazardous Waste
DWQ	Division of Water Quality
ft	feet
GCL	Geosynthetic Clay Liner
HWMU	Hazardous Waste Management Unit
msl	mean sea level
OE	Ordnance and Explosive
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
Shaw	Shaw Environmental, Inc.
SWMU	Solid Waste Management Unit
UAC	Utah Administrative Code
UDEQ	Utah Department of Environmental Quality
USGS	United States Geological Survey
UXO	Unexploded Ordnance

1.0 INTRODUCTION

The objectives of this Post-Closure Plan is to ensure that Dugway Proving Ground (DPG or Dugway) complies with the Post-Closure Permit issued by the State of Utah in accordance with Title 40 Code of Federal Regulations (CFR) §264.117, with respect to post-closure inspection requirements, ensure the landfill covers at these sites are maintained and ensure proper land use. To meet these objectives, this Post-Closure Plan provides detailed information regarding the location, regulatory criteria, and post-closure inspections at Solid Waste Management Units (SWMUs) 194A, 194B and 194C, herein referred to as DPG-194A, DPG-194B and DPG-194C, and collectively referred to as DPG-194. Post-closure requirements will continue for a minimum of 30 years after closure of DPG-194. The post-closure care period may be extended or shortened, as deemed necessary (40 CFR §264.117(a)(2)).

In accordance with 40 CFR §270.28 and Utah Administrative Code (UAC) R315-3-2.19, the Post-Closure Plan is required to include specific information for a closed facility. As applicable to DPG-194, the information requirements include:

- General description of the facility;
- Description of security procedures;
- General inspection schedule;
- Preparedness and Prevention Plan;
- Facility location information (including seismic and flood plain considerations);
- Closure Plan or Closure Proposal;
- Certificate of Closure;
- Topographic map, with specific scale;
- Summary of groundwater monitoring data; and
- Identification of uppermost aquifer and interconnected aquifers.

Table 1 provides the regulatory citations for the general information requirements and the specific locations in this Post-Closure Plan where the specific information is presented.

Table 1: Summary of DPG-194 Post-Closure Information Requirements Under 40 CFR §270.14, UAC R315-3-2.19, and UAC R315-3-2.5

Regulation Citation	Requirement Description	Location Requirement is Addressed
40 CFR §270.14(b)(1) UAC R315-3-2.5(b)(1)	General Description of the Facility	Section 2.0
40 CFR §270.14(b)(4) UAC R315-3-2.5(b)(4)	Description of Security Procedures	Section 3.0
40 CFR §270.14(b)(5) UAC R315-3-2.5(b)(5)	General Inspection Schedule	Section 6.0, Module VII Table VII-3, and Module VII Form B
40 CFR §270.14(b)(6) UAC R315-3-2.5(b)(6)	Preparedness and Prevention	Section 3.0

Table 1 (Continued): Summary of DPG-194 Post-Closure Information Requirements Under 40 CFR §270.14, UAC R315-3-2.19, and UAC R315-3-2.5

Regulation Citation	Requirement Description	Location Requirement is Addressed
40 CFR §§270.14(b)(11)(i-ii, v) UAC R315-3-2.5(b)(11) (i-ii, v)	Facility Location Information Applicable seismic standard	Section 4.3.1
40 CFR §§270.14(b)(11) (iii-v) UAC R315-3-2.5(b)(11) (iii-v)	Facility Location Information 100-year floodplain	Section 4.3.2
40CFR §270.14(b)(13) UAC R315-3-2.5(b)(13)	Copy of the Closure Proposal	Phase II RCRA Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) was approved on 09/30/2004. No public comments were received.
40 CFR §270.14(b)(14) UAC R315-3-2.5(b)(14)	Closure Certification and Notification	Section 2.7 and Appendix A.
40 CFR §270.14(b)(16) UAC R315-3-2.5(b)(16)	Post-Closure Cost Estimate	Federal Facilities are exempt from this requirement.
40 CFR §270.14(b)(18) UAC R315-3-2.5(b)(18)	Proof of Financial Coverage	Federal Facilities are exempt from this requirement.
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (i)	Topographic Map Map Scale and Date	Figure 2 (1 inch = 1000 feet [ft]).
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (ii)	Topographic Map 100-year floodplain area	Section 4.3; DPG-194 is not located within a verified 100-year floodplain area.
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (iii)	Topographic Map Surface waters including intermittent streams	Figure 2
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (iv)	Topographic Map Surrounding land uses	DPG-194 is located within a military base. There are no nearby operations in the vicinity of DPG-194.
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (v)	Topographic Map A wind rose (i.e., prevailing windspeed and direction)	There are no residential populations abutting DPG-194. The closest residential area is English Village (approximately 6.4 miles away). A wind rose is not deemed necessary for DPG-194.
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (vi)	Topographic Map Orientation of Map, North Arrow	Figure 2
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (vii)	Topographic Map Legal boundaries of the hazardous waste management facility	Figure 2
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (viii)	Topographic Map Access control, fence, gates	Figure 2. The site is not enclosed by a fence.
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (ix)	Topographic Map Injection and withdrawal wells	Figure 2

Table 1 (Continued): Summary of DPG-194 Post-Closure Information Requirements Under 40 CFR §270.14, UAC R315-3-2.19, and UAC R315-3-2.5

Regulation Citation	Requirement Description	Location Requirement is Addressed
40 CFR §270.14(b)(19) UAC R315-3-2.5(b)(19) (xi)	Topographic Map Barriers for drainage or flood control	Figures 3A, 3B, and 3C. DPG-194 is graded to drain surface water away from the engineered covers. There are no barriers to drainage or flood control.
40 CFR §270.14(c) UAC R315-3-2.5(c)(1)	Groundwater Monitoring Information Summary of Groundwater Data	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(2)	Groundwater Monitoring Information Identification of uppermost aquifer	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(3)	Groundwater Monitoring Information Delineation of the Waste Management Area	Figure 2
40 CFR §270.14(c) UAC R315-3-2.5(c)(4)	Groundwater Monitoring Information Extent of Plume	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(5)	Groundwater Monitoring Information Detailed Plans/Engineering Report for Proposed Groundwater Program	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(6)(i)	Groundwater Monitoring Information Proposed List of Parameters	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(6)(ii)	Groundwater Monitoring Information Proposed Groundwater Monitoring System	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(6)(iii)	Groundwater Monitoring Information Background Values	Post-closure groundwater monitoring at DPG-194 is not required.
40 CFR §270.14(c) UAC R315-3-2.5(c)(6)(iv)	Groundwater Monitoring Information A description of the Proposed Sampling	Post-closure groundwater monitoring at DPG-194 is not required.

2.0 FACILITY DESCRIPTION

The following provides a general description of DPG-194, located east of the Carr Facility, as required by UAC R315-3-2.5(b)(1) (Figures 1 and 2).

2.1 DPG-194 LOCATION AND HISTORY

DPG-194 consists of three subsites (DPG-194A, DPG-194B and DPG-194C), located east of the Carr Facility along the Old Lincoln Highway. DPG-194A, the western most subsite, consisted of one backfilled trench and one area of stained soil. DPG-194B, the middle subsite, consisted of three backfilled trenches (the two largest were covered by soil mounds) and four small soil mounds. DPG-194c, the eastern most subsite, consisted of a single backfilled trench. The locations of each subsite are shown in Figure 2. A detailed description of each subsite follows.

DPG-194A

DPG-194A occupied approximately 0.6 acres located 0.9 miles east of the Carr Facility along the Old Lincoln Highway (Figures 1 and 2). The site was relatively flat with an average elevation of approximately 4,367 ft mean sea level (msl). The site features included one backfilled trench and an area of stained soil that together covered an affected area of approximately 0.2 acres.

DPG-194B

DPG-194B occupied approximately 4.8 acres located 1.2 miles east of the Carr Facility along the Old Lincoln Highway (Figures 1 and 2). The site was relatively flat with an average elevation of approximately 4,375 ft msl. The site features included three backfilled trenches (the two largest were covered with mounds) and four small soil mounds that covered an affected area of approximately 1.2 acres.

DPG-194C

DPG-194C occupied approximately 0.7 acres located 1.5 miles east of the Carr Facility along the Old Lincoln Highway (Figured 1 and 2). The site is relatively flat with an average elevation of approximately 4,375 ft msl. The site features included one trench.

2.2 PAST OPERATIONS

DPG-194A

DPG-194A was reportedly used for disposal of range materials during the 1950s (Parsons, 2004a). Air photos indicate that the site was originally a large surface waste pile formed sometime between November 1950 and August 1953. Surface ordnance and explosive (OE) debris and metal scrap were removed from the site by base contractors. Site photographs indicate that this removal action occurred sometime between January 1994 and January 1999. Additional site history is unknown, including details regarding disposal dates and activities.

DPG-194B

DPG-194B was reportedly used for disposal of chemical munitions during the 1940s (Parsons, 2004b). Additional site history is unknown, including details regarding disposal activities.

DPG-194C

DPG-194C was reportedly used for disposal of chemical munitions during the 1940s (Parsons, 2003). Additional site history is unknown, including details regarding disposal activities.

2.3 PREVIOUS INVESTIGATIONS DOCUMENTATION

The detailed results of previous soil and groundwater sampling and closure information including the risk assessment are available for DPG-194 in the Division of Solid and Hazardous Waste (DSHW) public documents listed below in Table 2 (UAC R315-3-2.5(b)(13)).

Table 2: DSHW Library Documents Detailing DPG-194 Investigations

Document Title	Received Date	DSHW Library No.
Parsons Engineering, Science, Inc. (Parsons), 1999. *Final Phase I RCRA Facility Investigation Report, Revision 1*. September.	09/99	
Parsons, 2002. *Final Phase II RCRA Facility Investigation Risk Assumptions Document, Dugway Proving Ground, Dugway, Utah, Revision 2, Parsons Engineering Science, Denver, Colorado.* May.	05/02	
Parsons, 2003. *Final Phase II RCRA Facility Investigation Report, DPG-194C Addendum*. August.	08/03	
Parsons, 2004a. *Final Phase II RCRA Facility Investigation Report, DPG-194A Addendum*. April.	04/04	
Parsons, 2004b. *Final Phase II RCRA Facility Investigation Report, DPG-194B Addendum*. March.	03/04	
Shaw Environmental, Inc. (Shaw), 2006a. *Corrective Measures Study (CMS) Report, Firm Fixed-Price Remediation at Landfill Sites, Dugway Proving Ground, Dugway, Utah.* July.	07/06	
Shaw, 2006b. *Corrective Measures Implementation (CMI) Plan, Firm Fixed-Price Remediation at Landfill Sites, Dugway Proving Ground, Dugway, Utah.* November.	11/06	
Shaw, 2007. *Final Corrective Measures Implementation Report for DPG-194, Dugway Proving Ground, Dugway, Utah*. March.	03/07	

2.4 CLOSURE ACTIVITIES

In accordance with UAC R315-7-21 and the Corrective Measures Implementation (CMI) Plan (Shaw, 2006b), closure at DPG-194 has been completed with the construction of an engineered cover system consisting of a geomembrane-supported geosynthetic clay liner (GCL) placed over the identified waste trenches. The closure activities are described in the Final Corrective Measures Implementation Report (CMIR) (Shaw, 2007). Appendix A includes a copy of the DPG-194 Closure Certification.

The final cover system as designed and constructed satisfies the requirements of UAC R315-7-14 and R315-7-21 (by reference 40 CFR §264, Subpart N, 264.310) for the closure and post-closure of DPG-194, namely:

- Provide long-term minimization of migration of liquids through the closed landfill;

- Function with minimum maintenance;
- Promote drainage and minimize erosion or abrasion of the cover;
- Accommodate settling and subsidence so that the integrity of the cover is maintained; and
- Achieve a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present.

In meeting the above performance standards, the major closure activities completed at DPG-194 included:

- Installation of the final engineered cover system; and
- Final grading of the site, including enhancement of drainage features, to help control erosion and minimize long-term maintenance requirements.

These measures will prevent human contact with the waste and provide for protection of groundwater. A general post-closure inspection checklist for landfill sites (Form B) designed to ensure that these objectives are maintained is presented in Module VII.

2.5 HUMAN HEALTH AND ECOLOGICAL RISK ASSESSMENT

Human health and ecological risk assessments conducted in accordance with the Risk Assumptions Document (Parsons, 2002) indicated that no subsurface contamination was detected in soil (outside of the trenches, mounds, and the stained area). Groundwater at DPG-194 is not impacted and does not pose an unacceptable risk as defined in UAC R315-101. The risk assessment focused on areas outside the constructed cover, but did take into consideration airborne particulates emanating from the landfill surface prior to remediation. Direct sampling of the mound contents at 194A, the trench contents at 194B, and 194C could not be conducted due to the potential presence of Unexploded Ordnance (UXO), Chemical Warfare Materiel (CWM), and/or other ordnance and explosive (OE) debris. Despite the absence of direct sampling results, risks to intrusive site workers and burrowing ecological receptors associated with uncharacterized buried wastes are assumed to be unacceptable based on the types of materials potentially present. The industrial cancer risks are less than 1E-06 and the Hazard Indices are less than 1.0 for areas outside the trenches. Ecological risks are expected to be minimal. Due to the risks associated with direct exposure to the waste, intrusive activities into the buried wastes must be avoided. The human and ecological risk assessments as presented in the following documents: Final Phase II RCRA Facility Investigation Report, DPG-194A Addendum (Parsons, 2004a); Final Phase II RCRA Facility Investigation Report, DPG-194B Addendum (Parsons, 2004b); Final Phase II RCRA Facility Investigation Report, DPG-194C Addendum (Parsons, 2003). All three documents are included in Appendix B of the DPG-194 CMIR (Shaw, 2007).

2.6 SURFACE WATER AND GROUNDWATER

There are no defined surface water features within or near DPG-194. No defined drainage patterns are evident due to the low precipitation, and no surface water has been observed in any of the features at this site. Surface water drainage is generally to the southwest, as the surface topography slopes gently in this direction towards the axis of the Government Creek Basin.

Groundwater monitoring is addressed in the Carr GMA.

2.7 CLOSURE NOTIFICATIONS

The Certification of Closure (Appendix A) was received and verified by the Executive Secretary of the Utah Solid and Hazardous Waste Control Board.

Federal facilities are exempt from submitting notifications to the local zoning authority as required by 40 CFR §§264.116 and 264.119, which are incorporated by reference in UAC R315-8-7.

3.0 SECURITY REQUIREMENTS

The following security conditions are applicable to DPG-194:

1. DPG-194 is located within a federal, military installation (DPG). As such, the installation is restricted for the common population.

2. At DPG-194, signs are present warning against unauthorized entry.

3. Security facilities are to be maintained and inspected throughout the post-closure care period. The security facilities (i.e., posted signs) will be inspected and the frequency of inspections listed on the Post Closure Inspection Schedule. Dugway shall report to the DSHW any decrease of Dugway's Base Security, which could affect the security conditions as applicable to DPG-194.

4. Damaged or missing security facilities shall be noted in the general post-closure site inspection checklist for landfill sites (Form B) which is included in Module VII. Repairs shall be completed as soon as practicable after the problem is discovered, in compliance with R3l5-8-2.6(c).

4.0 POST-CLOSURE OPERATIONS AND INSPECTIONS

4.1 INTRODUCTION

DPG-194 has been closed under the DPG RCRA part B Permit requirements and specifications of the CMI Plan (Shaw, 2006b). Disturbance of the waste will not be allowed. To ensure that the area is not reused or developed, annual site inspections and a biennial Post-Closure Report shall be required.

4.2 ROUTINE SITE INSPECTIONS

During its post-closure period general inspections of the former DPG-194 site shall be conducted annually by November 1st to ensure that the integrity of the engineered cap is maintained and to verify the Dugway Dig Permit process as described in Module VII.I has been followed. Any modifications to the frequency of inspections will be in accordance with amendments submitted in the form of proposed permit modifications.

Site inspections will consist of a complete walkthrough and visual inspection of the covered areas as well as surface water drainage features. Module VII includes a general post-closure site inspection checklist for landfill sites (Form B). Completed inspection forms shall be filed with the Dugway Environmental Office.

4.2.1 Protective Soil Layer Inspections

Maintenance of the protective soil layer is an essential step in ensuring that the integrity of the final cover system is preserved. During each site visit, observations will be made to ensure that the protective soil layer is functioning as designed (i.e., protecting the underlying GCL). Repairs to the protective soil layer may include removal of vegetation species having tap roots greater than 12 inches, regrading through the

placement of fill in areas where a potential for ponding water on the cover exists due to settlement, or repair and stabilization of areas that have been eroded.

If signs of soil erosion are excessive (for example, cracks or rills greater than two-inches wide) or continual (recurring in the same area), corrective action may be necessary. Significant cracks or rills that have the potential to impact the functionality of the cover system will be documented on the inspection forms. Corrective action may include filling in the eroded or cracked area, regrading slopes, establishing vegetation (if soil salinity is favorable) or adding mulch to the soil surface. Soil samples will be collected in accordance with Field Work Variance 119350-02-006 (August 6, 2007) and analyzed for salinity as a contingency in case additional erosion control measures are necessary in the future.

For most routine repairs, corrective action should be initiated as soon as possible after identifying the problem or as directed by DPG. If the corrective action requires substantial effort and/or a technical plan, a brief plan will be prepared to summarize the problem, the potential impacts, and the time-frame in which corrective action will be implemented and the planning involved.

4.2.2 Survey Monument Inspections

During each visit, the survey monuments installed during closure (Figures 3A, 3B and 3C) will be inspected to determine if any damage has made its use questionable as a reference point. If missing or badly damaged, it will be replaced as soon as possible after discovery of the problem.

As part of the routine inspection, the survey monument locations (denoted SM-194A, SM-194B, SM-194C, in Tables 3A through 3C respectively) and elevations will be surveyed at least once per year for the first two years after construction. Once a settlement of 0.1 ft or less has been measured for two consecutive years, surveys can be scaled back to once every five years. The baseline northing, easting, and elevation of the DPG-194 survey monuments (SM-194A, SM-194B and SM-194C) have been summarized in Tables 3A, 3B and3C. In addition, the survey coordinates for locations around the perimeter of the cover system, shown on Figures 3A, 3B and 3C, are presented for future reference.

Table 3A: DPG-194A Survey Coordinates

Description / Pt. Location	Northing (ft)	Easting (ft)	Elevation[a] (ft above msl)
Survey Monument (SM-194A)	7,233,145	1,256,051	4,374.8
7000	7,233,132	1,256,125	4,374.1
7001	7,233,171	1,256,118	4,374.5
7002	7,233,153	1,256,008	4,373.4
7003	7,233,113	1,256,013	4,374.0

[a] *The locations and elevations represent design coordinates. The final elevations are provided in the 2008 Biennial report.*
ft = feet
msl = mean seal level

Table 3B: DPG-194B Survey Coordinates

Description / Pt. Location	Northing (ft)	Easting (ft)	Elevation[a] (ft above msl)
Survey Monument (SM-194B)	7,233,837	1,260,028	4,373.0
7000	7,233,817	1,259,932	4,371.4
7001	7,233,789	1,259,939	4,371.0
7002	7,233,798	1,259,993	4,371.7
7003	7,233,758	1,259,994	4,371.3
7004	7,233,758	1,260,044	4,371.9
7005	7,233,857	1,260,073	4,371.7
7006	7,233,935	1,260,076	4,372.0
7013	7,233,967	1,260,268	4,372.3
7014	7,233,923	1,260,276	4,372.0
7015	7,233,929	1,260,317	4,372.6
7016	7,233,972	1,260,347	4,372.3
7017	7,234,011	1,260,299	4,372.3

[a] *The locations and elevations represent design coordinates. The final elevations are provided in the 2008 Biennial report.*
ft = feet
msl = mean seal level

Table 3C: DPG-194C Survey Coordinates

Description / Pt. Location	Northing (ft)	Easting (ft)	Elevation[a] (ft above msl)
Survey Monument (SM-194C)	7,233,951	1,261,009	4374.5
7000	7,233,925	1,260,959	4374.0
7001	7,233,962	1,260,951	4373.9
7002	7,233,979	1,261,051	4374.1
7003	7,233,946	1,261,053	4373.9

[a] *The locations and elevations represent design coordinates. The final elevations are provided in the 2008 Biennial report.*
ft = feet
msl = mean seal level

Table 4 summarizes the Post-Closure Inspection Schedule for DPG-194, and lists the items to be inspected. Inspection personnel shall note any problems found and shall inform appropriate Dugway representatives.

Table 4: DPG- 194 Post-Closure Inspection Schedule

Inspection/ Monitoring Item	Method of Documentation	Frequency of Inspection
Landfill Caps	General Post-Closure Site Inspection Checklist for Landfill Sites (Module VII, Form B)	Annual
Salinity Testing	General Post-Closure Site Inspection Checklist for Landfill Sites (Module VII, Form B)	In accordance with Field Work Variance 119350-02-006
Settlement Markers	General Post-Closure Site Inspection Checklist for Landfill Sites (Module VII, Form B)	Annual / five year intervals
Signs	General Post-Closure Site Inspection Checklist for Landfill Sites (Module VII, Form B)	Annual
Drainage	General Post-Closure Site Inspection Checklist for Landfill Sites (Module VII, Form B)	Annual

4.3 CONTINGENCY INSPECTIONS

This section provides information about emergency response inspection procedures to be implemented in the event of any natural disaster in the DPG area that may affect the final engineered cover at DPG-194. Module VII provides a general post-closure site inspection checklist for landfill sites (Form B).

The Dugway Emergency Response and Contingency Plan (Part B Permit), where applicable to this site, shall be used to announce and respond to emergency conditions. At a minimum, the site inspector should have a radio or phone and a First Aid kit available during inspections.

4.3.1 Earthquakes

DPG is located in Seismic Zone 2 with a maximum acceleration of 0.2 gravity force (Hunt, 1984). DPG-194 is not located within 200 ft of any active faults. Although Utah is tectonically active, most of the earthquake activity occurs about 65 miles to the east along the Wasatch Range Foothills.

A geologic map completed in a 1988 study by the United States Geological Survey (USGS) (Barnhard and Dodge, 1988), was used to determine the distribution, relative age, and amount and extent of surface rupture on Quaternary fault scarps, in the area of DPG-194.

The USGS study (Barnhard and Dodge, 1988) concluded that morphologic and geologic data collected along the fault scarps in the area indicate that all were formed during the later Pleistocene era and there is not any clear evidence of Holocene surface rupture. Several faults inferred on geophysical evidence are located at DPG; however, there is no evidence of displacement during Holocene time.

In the event of a 6.5 magnitude or higher earthquake centered within 50 miles of the site, qualified personnel will visually inspect the landfill cap for signs of damage as soon as it is safe and practical to do so. Any damage to the landfill cap will be repaired to ensure the integrity of the cap. If the landfill cap has sustained extensive damage, Dugway will implement corrective actions to ensure that contaminants are contained and human health is protected. Post-earthquake site inspection records will be submitted to the Dugway Environmental Department.

Following an earthquake, the landfill and landfill cap will also be inspected for lateral shifting of debris. The survey monument will be surveyed to determine any horizontal or vertical movement of the cap.

4.3.2 Floods or Major Storms

DPG-194 is not located within a 100-year verified floodplain. The National Flood Insurance Rate Map, identifying the boundary of the 100-year flood, does not include DPG. There are no permanent streams or other surface water bodies on DPG.

During the capping of DPG-194, the site was graded so that surface water from precipitation flows away from the capped areas and to the northwest in the direction of the natural drainage flow. Most of the surface water evaporates rather than percolates into the ground. Like other arid regions, DPG is subject to flash flooding following high-precipitation events. Flash floods have occurred only four times in the history of the installation, in 1944, 1952, 1973, and 1983. The major area affected during flash floods has been the Government Creek drainage channel, which has overflowed and caused minor inundation of roads at the Ditto Technical Center.

In the event of a flood or major storm, Dugway will inspect the landfill cap to ensure its integrity within 72 business hours of the event. A general post-closure site inspection checklist for landfill sites (Form B) is included in Module VII. A major storm is defined in this plan as a storm with one inch of precipitation or more over a 24-hour period. Any damage to the landfill cap will be repaired as soon as possible to ensure the integrity of the cap.

4.3.3 Fires

In the event of a surface fire near the landfill cap, the Dugway fire department will be notified and the Dugway integrated contingency plan will be implemented. In the event of a landfill fire, if the cap is observed to have been breached, firefighting methods such as using foam or smothering with soil will be

considered and used, as appropriate. Following the incident, Dugway will perform a thorough inspection of the landfill cap using the general post-closure site inspection checklist for landfill sites (Form B) included in Module VII, to ensure that the integrity of the soil cover has not been compromised and waste has not been exposed. If there is fire damage, Dugway will implement corrective actions to ensure that contaminants are contained and human health is protected.

4.4 INSPECTION FOLLOW-UP

Copies of completed general post-closure site inspection checklists for landfill sites (Module VII, Form B) shall be forwarded to the Dugway Environmental Office. The Point-of-Contact for the Dugway Environmental Office is as follows:

Environmental Programs Compliance Representative
Dugway Proving Ground Environmental Program Office
Dugway Proving Ground, UT 84022
Telephone: (435) 831-3560

The Dugway Environmental Office shall notify the appropriate personnel to implement corrective action as needed.

Corrective action shall be initiated as soon as practical after identifying the problem, or as directed by Dugway. If the corrective action requires substantial effort, a technical plan shall be prepared to summarize the problem, the potential impacts, the proposed plan for action, and the time-frame in which corrective action will be implemented as required under this Permit. This plan shall be approved by the Executive Secretary prior to implementing corrective action.

5.0 SUBMITTALS/REPORTING

Based on the evaluation presented in the Final CMIR for DPG-194 (Shaw, 2007), post-closure inspection is required. Groundwater monitoring is not required for DPG-194.

5.1 NON-COMPLIANCE REPORTING

The conditions at DPG-194 are such that the impact to human health and the environment is very unlikely. Hazardous wastes are no longer managed at the site. Nonetheless, if there is any type of non-compliance with any condition of this Permit, notifications shall be submitted per permit condition VII.C.5.

5.2 BIENNIAL POST-CLOSURE REPORT

In accordance with UAC R315-3-3.1(l)(9), a Biennial Post-Closure Report shall be prepared for all Dugway closed Hazardous Waste Management Units (HWMUs) and SWMUs undergoing post-closure care by March 1, of the reporting year. The first Post-Closure Report for DPG-194 shall be due no later than March 1, 2008. Specifically for DPG-194, the Biennial Post-Closure Report shall include, at a minimum, the following:

- General site description and conditions;
- Areas of cap repair; and
- Inspection records.

5.3 REQUIRED SUBMITTALS

Table 5 summarizes the requirements for the Biennial Post-Closure Report for DPG-194 and reporting for any non-compliance.

Table 5: Summary Table of Required Submittals

Required Submittals	Frequency and Submittal Date
Biennial Post-Closure Report	Post-Closure Reports shall be submitted to the DSHW no later than March, of the year the report is due. Reporting years are even numbered years beginning with March 2008, for the duration of the Post-Closure Monitoring Period.
Non-Compliance Reporting Anticipated Non-Compliance 24-hour Notification for information concerning the non-compliance, which may endanger public drinking water supplies or human health or the environment.	 30 days advance notice of any change which may result in noncompliance Orally within 24 hours of discovery

Table 5 (Continued): Summary Table of Required Submittals

Required Submittals	Frequency and Submittal Date
Five-day written notification for information concerning the non-compliance, which may endanger public drinking water supplies or human health or the environment including evidence of groundwater contamination, significant data quality issues, or a request for reduced monitoring frequency. The Executive Secretary may waive the 5-day notice, in favor of a 15-day notice. Written notification for information concerning the non-compliance, which does not endanger human health or the environment.	Within 5 days of discovery Submitted when the Biennial Post Closure Reports are submitted.

6.0 POST-CLOSURE CERTIFICATION

No later than 60 days after post-closure activities are completed and approved by the Executive Secretary, Dugway representatives shall submit a certification to the Board, signed by Dugway and an independent professional engineer registered in the State of Utah, stating why post-closure care is no longer needed.

7.0 REFERENCES

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APPENDIX A

COPY OF
CERTIFICATION OF CLOSURE

CERTIFICATION OF CLOSURE

The Closure Certification Report for DPG-194 at Dugway Proving Ground, Utah has been prepared by Shaw Environmental in accordance with the closure requirements specified under the DPG Part B RCRA Permit and the CMI Plan. The requirements of UAC R315-101 form the basis for the risk-based criteria in the closure of DPG-194. The site has been managed in accordance with the specifications in the approved CMI Plan, except for re-vegetation (Section 2.4.5).

In accordance with the DPG Part B RCRA Permit, the signature and seal certify that a licensed professional has reviewed the Corrective Measures Implementation Report in accordance with the above referenced regulatory requirements.
Respectfully submitted,

_____
Scott Reed
Directorate of Environmental Programs
Dugway Proving Ground

_____
Sunil Kishnani, P.E.
Utah Registered Civil Engineer No. 6027103
Shaw Environmental, Inc.