

Attachment A

November 8, 2012 and March 8, 2013 Request Letters from EnergySolutions

Underlined/strikeout copies of Appendices J and K included

## ENERGYSOLUTIONS

November 8, 2012

CD12-0286

Mr Rusty Lundberg  
Co-Director  
Utah Division of Water Quality  
P O Box 144850  
SLC, UT 84114-4850

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DEPARTMENT OF  
ENVIRONMENTAL QUALITY

Re Ground Water Quality Discharge Permit No. UGW 450005 – Request for  
Modification to Appendix J and K

Dear Mr Lundberg

EnergySolutions requests approval of the attached proposed modifications to Appendix J, *BAT Performance Monitoring Plan* and Appendix K, *BAT Contingency Plan* Requested changes are summarized and justified below

- 1 Remove Table 1 from Appendix J This table simply re-states requirements found elsewhere in the Permit and Appendix J, without imposing unique points of compliance This is redundant and provides the potential for text to diverge as future changes are made to the Permit and Appendix J If text were to diverge in future changes, the Permit could become internally inconsistent It is simpler to remove the table
- 2 Revise BAT inspection frequency to weekly, or after precipitation events of greater than 0.1 inches Many years of monitoring at the Clive facility have demonstrated that the majority of BAT failures are directly correlated to storm events Furthermore, the volumes of waste managed at the facility have dramatically declined from their peak in 2005 In order to optimize the efficiency of site operations at the level of current receipts, a number of facilities have been taken out of service Therefore, weekly inspections with additional event-triggered inspections provide an equivalent level of assurance that BAT will be maintained The action level of 0.1 inches of precipitation was selected based on operational history at the site – at precipitation levels below this, stormwater accumulation is typically negligible There is regulatory precedent for weekly BAT inspections in DRC's approval of Ground Water Quality Discharge Permit No. UGW 370004 for the Energy Fuels Resources White Mesa Mill
- 3 Organizational titles and responsibilities are updated to reflect the revised facility organization submitted to DRC on October 24, 2012

- 4 Minor edits are made throughout to improve clarity and reduce redundancy. These edits are not intended to change the point of compliance
- 5 Appendix J, Section 4 20 9 is revised to remove the requirement that a Professional Engineer perform the annual pressure test of pipe-in-pipe systems. The testing will continue to be performed and documented in accordance with ASTM methodology, with notification to DRC for an opportunity to observe.
- 6 Quality assurance requirements are reduced. While quality assurance reviews will still be performed, these are internal controls to ensure that regulatory points of compliance are met. Quality assurance reviews should not be points of compliance in and of themselves.
- 7 Attachments 1 through 4 of Appendix J are revised to reflect the above changes. Attachments 5 and 6 are rendered obsolete with the change to weekly inspection and are removed. Attachment 7 inspection of the DU Storage Building is incorporated into Attachment 1, and Attachment 7 is removed.
- 8 Appendix K, Section 4 23 4, "Failure to Construct as per Approval Designated in I E 3" is removed. Failure to meet CQA/QC specifications in embankment construction is addressed within the LLRW and 11e (2) CQA/QC Manual, specification "Test Failure Protocol". The CQA/QC Manual is incorporated into the Permit with each cell description and provides more detailed guidance for various CQA/QC failures. Therefore, the general text in section 4 23 4 is redundant with requirements stated more completely elsewhere.

The requested revisions also impact the following items in the Permit:

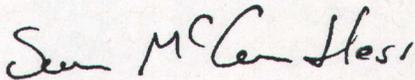
- 1 Part I E 3 should be reserved. As discussed above, this Part is redundant with the LLRW and 11e (2) CQA/QC Manual. Furthermore, there is no similar such text in Ground Water Quality Discharge Permit No. UGW 370004 for the Energy Fuels Resources White Mesa Mill.
- 2 Part I E 10 a 9 should have the word "daily" deleted.
- 3 Part I E 14 a 2 should be edited to delete the word "daily" as follows: " the Permittee shall measure the ~~daily~~ volume of all fluids pumped from the respective leak detection systems of the 1995, 1997, 2000, Mixed Waste, and Northwest Corner evaporation ponds. Under no circumstance shall the ~~daily~~ leak detection system flow volume. "
- 4 Part I E 17 should have the word "daily" deleted.

- 5 Part I F 2 m should have the text “ by a qualified independent Professional Engineer registered in the State of Utah” replaced with “. in accordance with the BAT Performance Monitoring Plan in Appendix J of this Permit ”
- 6 Part I F 12 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 12, Part I F 12 could in fact be reserved as redundant
- 7 Part I F 13 a should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 13 a, Part I F 13 a could in fact be reserved as redundant
- 8 Part I F 16 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 16, Part I F 16 could in fact be reserved as redundant
- 9 Part I F 17 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 17, Part I.F 17 could in fact be reserved as redundant
- 10 Part I F 18 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 18, Part I F 18 could in fact be reserved as redundant
- 11 Part I F 19 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 19, Part I F 19 could in fact be reserved as redundant
- 12 Part I F 24 should have the word “daily” deleted
- 13 Part I F 25 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 25, Part I F 25 could in fact be reserved as redundant
- 14 Part I F 26 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 26, Part I F 26 could in fact be reserved as redundant
- 15 Part I F 27 should have the word “daily” deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 27, Part I F 27 could in fact be reserved as redundant

- 16 Part I F 28 should have the word "daily" deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part L F 28, Part I F 28 could in fact be reserved as redundant
- 17 Part I F 29 should have the word "daily" deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I F 29, Part I F 29 could in fact be reserved as redundant
- 18 Part I G 4 c should have the word "daily" deleted
- 19 Part I H 12 b should have the word "daily" deleted
- 20 Part I H 19 should have the word "daily" deleted Because the BAT Performance Monitoring Plan is already incorporated at Part I F 22 and no unique points of compliance are presented in Part I H 19, Part I H 19 could in fact be reserved as redundant
- 21 Part I H 20 should have the word "daily" deleted

Please contact me at 801-649-2000 with any questions regarding this issue

Sincerely,



Sean McCandless  
Manager, Compliance and Permitting

cc John Hultquist, DRC  
Phil Goble, DRC

Permit No UGW450005

APPENDIX J

Groundwater Quality Discharge  
Permit BAT Performance Monitoring  
Plan

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## 1 INTRODUCTION

EnergySolutions, LLC (EnergySolutions) has been granted a Groundwater Quality Discharge Permit, (GWQDP) Permit No. UGW450005 hereinafter called the Permit, by the State of Utah. The Permit specifies the construction, operation, and monitoring requirements for all EnergySolutions facilities that have a potential of discharging pollutants that may move directly or indirectly into groundwater. To cause the maximum reduction of pollutants achievable, the Permit specifies that "Best Available Technology" (BAT) be used in the construction of all facilities and that facilities be operated according to "Best Management Practices"

The Permit lists individual facilities that have BAT criteria associated with them. This BAT monitoring plan addresses the facilities and their BAT description and performance criteria (Table 1).

The Permit requires that EnergySolutions develop and follow a monitoring, inspection and maintenance plan for permitted facilities. BAT inspections are required to be performed once per week and after precipitation events of greater than 0.1 inches a daily basis at the site. ~~On weekends or holidays when operational activities are not occurring, the daily BAT inspections can be postponed until the next regular work day. The BAT inspections are required on weekends or holidays if operational activities are taking place.~~ If failure of BAT occurs at any facility, the BAT Contingency Plan located at Appendix K to the GWQDP shall be implemented.

## 2 DEFINITIONS

### **Access Pipe:**

A pipe placed to provide access for the monitoring of leak detection system BAT performance criteria

### **Allowable leakage rate:**

Volume of fluid allowed to enter into leak detection systems through the upper flexible membrane liner of the evaporation ponds, averaged over a seven-day period. Volumes up to the allowable leakage rate do not constitute a failure of BAT

### **Best Available Technology (BAT):**

The application of design, equipment, work practice, operation standard or combination thereof, at a facility to effect the maximum reduction of a pollutant achievable by available processes and methods taking into account energy, public health, environmental and economic impacts and other costs

### **BAT Compliance Monitoring Points:**

Designated points of inspection, sampling, analysis, and monitoring to confirm compliance with the Permit

**Bor-o-scope:**

Specialized equipment used to perform annual video inspection of the entire length of the drainage pipe of each collection lysimeter and inspection of other BAT piping as needed

**BAT Contingency Plan (Appendix K to the GWQDP):**

Plan for regaining and maintaining compliance with Permit limits and for reestablishing compliance with best available technology. This plan will be implemented if any of the BAT Performance Criteria specified in this plan are not met

**Contact Stormwater:**

Stormwater that has contacted waste, such as storm water within the Disposal Cells, Rail Rollover Facility, Rotary Dump Facility, or Intermodal Unloading Facility

**Daily/Weekly Inspection:**

~~For purposes of this plan, daily inspections are required any day that waste or water management activities occur. The daily inspection is not required on weekends or holidays if water and waste management activities are not being conducted. Waste management activities include shipment receipt, unloading, waste placement, or decontamination facility operation. BAT inspections are required to be performed once per week, whether the facility is in operation or not.~~

**Discrepancy relating to Pad Integrity:**

Either. 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width) or 2) any significant deterioration or damage of the pad surface

**Exposed Pad:**

The surface of pad or concrete surface not covered with containers or process material

**Freeboard:**

The vertical distance between the spillway elevation of fluid containment system and the water elevation

**Free Drainage:**

The drainage of water from one designated area to another, including sloped surfaces and pipelines, in such a manner that water is not blocked or dammed by foreign material including sediment, debris, and other items not approved in the design and construction of a facility. Free drainage includes the movement of water aided by mechanical means such as sumps, pipelines, etc. Free drainage shall be maintained at all facilities as addressed in this plan

**Gravity Flow:**

The free movement of water from a higher elevation to a lower elevation for water transfer to designated areas of the facility.

**Head/pressure transducer:**

An instrument used to detect, measure, and report the water level in a monitoring well or detection sump system

**Leak Detection System:**

An engineered system designed to detect leaks in a low-permeability liner and capable of collecting and removing fluid present in the leak detection sump.

**Leak Detection Sump:**

A sump constructed between an upper and lower low-permeability liner that provides a collection point for detecting, measuring, and removing fluids that have leaked through the upper liner. When fluid is detected in the sump, it is an indication that the upper liner may be leaking.

**Non-contact Stormwater:**

Stormwater that has not contacted waste that is within the restricted area.

**Pad Integrity:**

The physical integrity of a pad structure including but not limited to the presence of cracks, ruptures, damaged or porous areas, areas of subsidence or thinning.

**Pump-back system:**

An automatic system that provides for the removal of liquids from the leak detection system and reconveyance of the liquids to the associated evaporation pond.

**Pump controller:**

An instrument that controls the activation and deactivation of the submersible pump.

**Pump-down test:**

A test that determines the accuracy of the leak detection system.

**Submersible pump:**

A pump specially designed and engineered for being submersed in water.

**Transfer Sump:**

A collection sump that is used to pump water from one point to another at the facility.

**Weir:**

A wall located in a settlement basin designed to control water flow to maximize sediment collection in the basin.

**Weir Notch:**

A notch located on a weir that allows water to flow from the settlement basin to an area in which water is collected for pumping.

### 3 RESPONSIBILITIES

The **Quality Assurance Manager (QAM)** or designee is responsible for performing surveillance and/or audit activities to verify implementation and compliance with the requirements of this plan and review of all designated forms as part of the quality assurance review for accuracy and completeness. The QAM is also responsible for providing required verbal notifications to regulatory agencies and the ~~Director of~~ Manager, Compliance and Permitting

~~The Director of Mixed Waste Operations and Director of LLRW Manager, Waste Disposal Operations~~ (or designees) ~~are is~~ responsible for maintaining assigned facilities in compliance with BAT requirements of the Clive site at all times. The applicable site ~~director Manager, Waste Disposal Operations~~ (or designee) shall immediately notify the QAM when any BAT Failure occurs. At the discretion of the Vice President of Clive, a full-time management position may be designated to act on behalf of both Directors to oversee the daily duties associated with inspecting BAT facilities.

The ~~Director of Health Physics (DHP) Manager, Health Physics and Safety (RSO)~~ or designee is responsible for performing evaluations of any existing threat or potential threat to public health and the environment, ~~as necessary, and determining sampling parameters for free liquid if present in the collection lysimeters in cooperation with the~~ Director of Compliance and Permitting

The **Facility Operator or BAT Inspector** performs the routine daily inspections and provides notification to the ~~Director of LLRW Manager, Waste Disposal Operations and Quality Assurance Manager, or designates~~ of any BAT non-compliance for the LLRW/11e(2) Facility. The Facility Operator or BAT Inspector has the authority to initiate repairs when needed.

~~The Mixed Waste Facility Operator or designee perform the routine daily inspection and provides notification to the Director of Mixed Waste Operations, Quality Assurance Manager, or designates of any BAT non-compliance for the Mixed Waste Facility.~~

The **Site Hydrogeologist** or designee is responsible for performing collection lysimeter measurements and determining compliance.

The ~~Director of~~ Manager, Compliance and Permitting or designee is responsible for determining sampling parameters for free liquid if present in the collection lysimeters, reviewing all groundwater sampling data, and performing review of annual video inspection of the lysimeters. The ~~Director of~~ Manager, Compliance and Permitting is responsible for providing required written notification to the regulatory agencies.

The ~~Director of~~ Manager, Engineering and Maintenance or designee is responsible for scheduling and oversight of pump down testing if required.

The **Maintenance Manager** or designee is responsible, and for performing preventative maintenance on facility equipment in accordance to the manufacturer specifications and

guidelines, and ensuring that spare sump pump and replacement parts (including batteries for portable measuring devices, etc ) are on site at all times for required repairs

#### 4 BAT PERFORMANCE MONITORING

EnergySolutions is responsible for implementing the best available technology, summarized in ~~Table 1 (BAT Monitoring and Performance Criteria Chart)~~ this Plan, to prevent discharge of fluids from the following facilities to subsurface soils or groundwater. Compliance with the performance standard(s) will be evaluated by performing and documenting inspections, performing equipment maintenance and repairs as required, and by implementing corrective actions.

##### 4.1 1995 Evaporation Pond

Freeboard compliance at the 1995 Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e (2) Facility Daily-Inspection Form (Attachment 1).

The 1995 Evaporation Pond is equipped with a pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. ~~The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation.~~ Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

Measurement of ~~daily~~ leak detection system flow volume is read from the flow meter and recorded ~~every day operations are being performed on the inspection form~~. The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2. The maximum allowable daily leakage volume for the 1995 Evaporation Pond is 162 gallons/day. If the calculated leakage rate is above 155 gallons/day a pump down test will be performed. A calculated leakage rate greater than 162 gallons/day is deemed a failure of BAT.

~~The leak detection system sump is inspected daily.~~ An inspection of the leak detection system and preventative maintenance will be performed annually in accordance with CL-EN-PR-023-~~(ENG-2-3)~~, *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 1. The fluid head level is not to exceed a 1-foot level (readout above 1.0) above the lowest point in the lower flexible membrane liner. An exceedance of the 1-foot level is deemed a failure of BAT. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate ~~on the first working day of the week from any measurements taken over the previous seven calendar days~~

#### 4.2 1997 Evaporation Pond

Freeboard compliance at the 1997 Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e (2) Facility Daily-Inspection Form (Attachment 1)

The 1997 Evaporation Pond is equipped with a leak detection pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line ~~The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure~~

Measurement of ~~daily~~ leak detection system flow volume is read from the flow meter and recorded ~~every day operations are being performed on the inspection form~~ The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2 The maximum allowable daily leakage volume for the 1997 Evaporation Pond is 171 gallons/day If the calculated leakage rate is above 160 gallons/day a pump down test will be performed.

~~The leak detection system sump is inspected daily. An inspection of the leak detection system and preventative maintenance will be performed annually in accordance with CL-EN-PR-023 (ENG-2-3), Annual Evaporation Pond Pump Inspection~~ The process controller is read to measure fluid head. The measurement is documented on Attachment 1 The fluid head level is not to exceed a 1-foot level (readout above 1 0) above the lowest point in the lower flexible membrane liner An exceedance of the 1-foot level is deemed a failure of BAT Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate ~~on the first working day of the week from any measurements taken over the previous seven calendar days~~

#### 4.3 Pond Lift Station

The Pond Lift Station is designed and constructed to transfer wastewater from the Intermodal Unloading Facility Lift Station and the Containerized Waste Storage Pad into either the 1995 Evaporation Pond or the 1997 Evaporation Pond

The pond lift station is inspected daily for the activation of the visual alarm. The alarm will activate when the water level within the lift station rises above the lowest level of the inlet pipe. The alarm is inspected during the second week of each month. The inspection results will be recorded on Attachment 1.

#### 4.4 2000 Evaporation Pond

Freeboard compliance at the 2000 Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e (2) Facility Daily-Inspection Form (Attachment 1)

The 2000 Evaporation Pond is equipped with a leak detection pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. ~~The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation.~~ Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

Measurement of daily leak detection system flow volume is read from the flow meter and recorded every day. ~~operations are being performed on the inspection form.~~ The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2. The maximum allowable daily leakage volume for the 2000 Evaporation Pond is 382 gallons/day. If the calculated leakage rate is above 355 gallons/day a pump down test will be performed.

~~The leak detection system sump is inspected daily.~~ An inspection of the leak detection system and preventative maintenance will be performed annually in accordance with CL-EN-PR-023 (ENG-2-3), *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 1. The fluid head level is not to exceed a 1-foot level (readout above 1.0) above the lowest point in the lower flexible membrane liner. An exceedance of the 1-foot level is deemed a failure of BAT. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate ~~on the first working day of the week from any measurements taken over the previous seven calendar days.~~

The Transfer Pad is designed and constructed with a gravity flow system to provide free drainage of water from the transfer pad to the sump collection area. The pad is inspected daily to ensure that free drainage conditions exist to the sump collection area and ensure concrete integrity. The sump collection area is inspected to ensure total containment of water.

#### **4.5 Northwest Corner Evaporation Pond**

Freeboard compliance at the Northwest Corner Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e (2) Facility Daily-Inspection Form (Attachment 1)

The Northwest Corner Evaporation Pond is equipped with a leak detection pump-back system that includes the following Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line ~~The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation—~~Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure

Measurement of ~~daily~~ leak detection system flow volume is read from the flow meter and recorded ~~every day that operations are being performed on the inspection form~~ The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2 The maximum allowable daily leakage volume for the Northwest Pond is 326 gallons/day If the calculated leakage rate is above 300 gallons/day a pump down test will be performed. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate ~~on the first working day of the week from any measurements taken over the previous seven calendar days~~

The Transfer Facility was constructed and designed for trucks to collect and discharge water on a containment surface The concrete pad slopes towards the pond and an HDPE apron/rub sheet attaches to the edge of the concrete pad The rub sheet extends down the slope of the pond providing for water transfer over rub sheets thereby, reducing any negative effects on the pond liner The pad is inspected monthly to ensure concrete integrity and the apron is inspected for any signs of cracks, holes, or tearing

#### **4.6 Mixed Waste Evaporation Pond**

Freeboard compliance at the Mixed Waste Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the Mixed Waste Evaporation Pond Daily-Inspection Form (Attachment 3)

The Mixed Waste Evaporation Pond is equipped with a leak detection pump-back system that includes the following Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line ~~The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation—~~Failure of any pumping or monitoring equipment not repaired and made fully operational within 24

hours of discovery is deemed a BAT failure. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system

Measurement of ~~daily~~ leak detection system flow volume is read from the flow meter and recorded every day operations are being performed on the inspection form. The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate. The weekly calculations are documented on ~~the Mixed Waste Evaporation Pond Leak Detection System Volume Weekly Calculation Form, Attachment 53~~. The maximum allowable daily leakage volume for the Mixed Waste Evaporation Pond is 171 gallons/day. If the calculated leakage rate is above 160 gallons/day a pump down test will be performed

~~The leak detection system sump is inspected daily~~—An inspection of the leak detection system and preventative maintenance will be performed annually in accordance with CL-EN-PR-023 (ENG-2-3), *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 3. The fluid head level is not to exceed a 1-foot level (readout above 1.0) above the lowest point in the lower flexible membrane liner. An exceedance of the 1-foot level is deemed a failure of BAT.

~~The Mixed Waste Facility Operator or BAT Inspector designee is responsible for performing and documenting inspection results, and calculating the average daily leakage rate on the first working day of the week from any measurements taken over the previous seven calendar days~~

#### 4.7 LARW, Class A, and Class A North Cell Collection Lysimeters

The LARW, Class A, and Class A North Cell Collection Lysimeters are monitored in accordance with Appendix C, *Specifications and Operation, Maintenance, and Closure Plans for Collection Lysimeters and Related Approvals* by the Site Hydrogeologist for the presence of liquids. An annual video inspection will be performed by the Site Hydrogeologist or designee using a bor-o-scope

Monitoring will be performed using an electronic water level probe to measure for free liquids in the lysimeter. Free liquid is not allowed in the standpipe to be less than 12 inches below the intersection of the transfer pipe. Liquids less than 12 inches below the intersection are deemed a failure of BAT. Any liquid present will be purged using a peristaltic pump or dedicated PVC bailer. Free liquid measurements obtained and the time and date of the measurements will be recorded on the Monitoring For Free Liquids Form (Attachment 4)

It is anticipated that the volume of free liquids in the standpipe will be limited and that if free liquids are present, the available quantities will restrict the chemical and radiological analyses to only a few select constituents. If and when free liquids appear in a collection lysimeter, the characteristics of the waste disposed in the general area will be evaluated

and chemical and radiological constituents selected by the DHP and Director of Manager, Compliance and Permitting. Selection of analytical parameters will be based on highest mobility and probability of occurrence in the leachate, and the amount of liquid available for sampling.

NOTE *Lysimeters are not required to be sampled if free liquid is not present in the standpipe*

#### 4.8 Rail Rollover Facility

The Rail Rollover Facility is designed and constructed to aid in the unloading of waste from railcars. The BAT operation standard at the Rail Rollover Facility is to prevent stormwater from contacting waste. The Rail Rollover Facility is equipped with a concrete berm directing water flow to a concrete trough, a settling basin, and a collection sump. The berm has been constructed to channel surface flow of stormwater away from the rollover pit to a trough. Water free drains from the trough through the settling basin and into the sump. Water is transferred from the sump via double piping (pipe in pipe) to the manhole at the Rail Wash Facility on Track 2, with further free drainage to the 1995 and 1997 Evaporation Ponds by way of the IUF Lift Station. The piping from the sump to the manhole is sloped so that if a leak should develop in the internal pipe, water will flow back to the sump in the external pipe.

The facility is inspected daily to ensure that ponded water does not exist within the covered area of the facility, the sump pump is operational (water level will be maintained below the grate), and free drainage conditions exist from the berm to the trough to the settling basin and sump. The berms, trough, settling basin, and sump shall be cleaned weekly or when sediment levels restrict free drainage. The results of the daily inspection results are recorded on Attachment 1.

In addition, the Rollover Facility is taken out of service and inspected annually during the second quarter, to ensure integrity of the asphalt ramps and the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.

#### 4.9 Containerized Waste Storage Pad

The Containerized Waste Storage Pad is designed and constructed with a gravity flow system to providing drainage of stormwater to the Pond Lift Station.

A daily inspection is performed by the Facility Operator or BAT Inspector. The facility is inspected to ensure free drainage to the sump, that the sump is operational, ensure that the exposed pad is free from dirt and debris, and to ensure pad integrity. Cracks, ruptures, damaged, or porous areas found in the asphalt surface shall be sealed or repaired, and areas of subsidence will be filled and returned to its original design grade within 10 days.

of discovery All containers are inspected for leakage, proper storage and labeling Leakage of waste shall be remediated by immediate container overpack or by proper disposal in the embankment The inspection results are recorded on Attachment 1

#### **4.10 Intermodal Unloading Facility**

The Intermodal Unloading Facility is designed with a gravity flow system to the IUF Lift Station collection manhole A sump pump is located within the manhole and pumps to a drain line to the Pond Lift Station.

The Intermodal Unloading Facility is inspected daily by the Facility Operator or BAT Inspector to ensure free drainage to the sump, that the sump pump is operational, to ensure that the exposed pad is free from dirt and debris, and to ensure exposed pad integrity and free draining conditions on both the unloading pad and in the stormwater drainage pipeline system Results of the inspection are recorded on Attachment 1

In addition, the The Intermodal Unloading Facility is inspected annually during the second quarter to ensure integrity of the concrete surfaces The inspection may occur one bay at a time If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the affected inspected-bay The results of the bay inspections are documented The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report

#### **4.11 Intermodal Unloading Facility Lift Station**

The Intermodal Unloading Facility Lift Station is designed and constructed to provide for the drainage of wastewater from the Rail Wash Facility on Track No 2, the Intermodal Unloading Facility, the Railcar Digging Facility, and the Rail Rollover Facility to the pond lift station

The Intermodal Unloading Facility Lift Station is inspected daily for the activation of the visual alarm The alarm will activate when the water level within the lift station rises above the lowest level of the inlet pipe The alarm is inspected during the second week of each month The inspection results will be recorded on Attachment 1

#### **4.12 LARW Box-Washing Facility**

The LARW Box-Washing Facility is designed and constructed to provide free drainage of washwater from the wash pad to the floor sumps and through across the wastewater drainage pipeline to the concrete holding tanks

The LARW Box-Washing Facility is inspected daily by the Facility Operator or BAT Inspector to ensure that free drainage conditions exist to the floor sumps through the wastewater drainage pipeline to the concrete holding tanks The sump area is inspected to ensure that the sump pump is operational The concrete surface is inspected to ensure that the exposed pad is free from dirt and debris, and to ensure concrete integrity The holding tanks are inspected to ensure that the water level is maintained at or below three-

quarters full. The cap placed over the outlet from the facility is inspected for integrity. The inspection results will be recorded on Attachment 1.

#### **4.13 Rail Wash Facility on Track No. 4**

The Rail Wash Facility on Track No. 4 is designed and constructed to provide free drainage of washwater from the rail wash floor and concrete trench to the floor sumps and through the piping that discharges to the collection tank(s) of the adjacent equipment/mechanics building.

The Rail Wash Facility on Track No. 4 is inspected daily by the Facility Operator or BAT Inspector to ensure that free drainage conditions exist in the concrete trench and the rail wash pads to the floor sumps for discharging to the collection tank(s) of the adjacent equipment/mechanics building. The sump is inspected to ensure that the sump pump is operational. The collection tank(s) and gray water discharge pump are inspected daily to verify that the system is functioning. The concrete surface is inspected to ensure that the exposed pad is free from dirt and debris, and to ensure concrete integrity. The rail wash pads are inspected to ensure total containment of water and that they do not cause a direct or indirect discharge to subsurface soils or groundwater (overflow). The results of the inspection are recorded on Attachment 1.

#### **4.14 Rail Digging Facility**

The Rail Digging Facility located between Track No. 3 and Track No. 4 is designed and constructed to provide free drainage of stormwater from the asphalt containment pad and ramps to three concrete collection basins. Water from the collection basin drains to a settling basin. Water continues to drain through piping to the digging facility manhole, continuing on to the Intermodal Unloading Facility Lift Station. The Rail Digging Facility is designed for the digging of waste from rail cars and placement of waste within hauling equipment. No waste storage will occur.

The Rail Digging Facility is inspected daily by the Facility Operator or BAT Inspector to ensure that free drainage conditions exist from the asphalt containment pad to the concrete collection basins. The collection basins are inspected to ensure that water levels are not above the level of the grates and the settling basin is inspected to ensure that the water level is not above the elevation of the outlet pipe. The digging facility manhole located on the west side of track 2 directly west of the Rail Digging Facility settling basin will be inspected for any sign of leakage. The concrete area and the asphalt surfaces are inspected to ensure that the exposed pad is free from dirt and debris, and to ensure pad integrity. The results of the inspection are recorded on Attachment 1.

#### **4.15 East Truck Unloading Area**

The East Truck Unloading Area includes the Container Holding Pads, Unloading Dock with Ramp and Unloading Area asphalt surfaces. The facility is designed with a gravity flow system to direct stormwater accumulated on the asphalt surfaces away from the concrete container holding pads. The concrete container holding pads are designed with

a gravity flow system to direct water that accumulates on the concrete surface to collection troughs.

The Container Holding Pads are inspected daily to ensure gravity flow to the collection troughs, ensure that water level in the troughs does not exceed three-quarters full, ensure that exposed surfaces of the container holding pads are free from dirt and debris, and ensure structural integrity of container holding pad, curb, and trough exposed surfaces. Overnight storage is prohibited at the dock and on asphalt surfaces within the facility. Storage and sampling are restricted to the concrete holding pads. Containers may be placed temporarily on the asphalt surface to facilitate transfer. Temporary is defined as the current acceptance date on the Bates Label. Therefore, this prohibits overnight storage.

#### ***4.16 Decontamination Access Control Building***

The Decontamination Access Control Building is designed and constructed to provide personnel access to the Restricted Area. The design provides for free drainage from the facility to the wastewater collection tank buried outside the southwest corner of the building.

The facility is inspected daily to ensure free drainage to the wastewater collection tank from the bootwash, respirator sink, shower, and sink located next to the shower, to ensure that the water remains at a level below the bottom elevation of the inlet pipe, ensure that visual alarm is not currently activated, ensure automatic removal of water from the tank as necessary, and ensure that there is no fluid within the discharge pipe and tank leak detection systems. The visual alarm for water level is inspected during the second week of each month.

#### ***4.17 Intermodal Container Wash Building***

The Intermodal Container Wash Building is used for the decontamination of containers. It was designed with a leak detection system and constructed in order to provide for the free drainage of washwater from the bootwash, and washbays to the sediment basin.

The Intermodal Container Wash Building is inspected daily to ensure the free drainage of water from the bootwashes to the trough, from the wash bays through troughs to a sediment basin, and to ensure that the water level in the sediment basin remains below the weir grate and that the automatic discharge pump system is operational. The leak detection ports are inspected daily for the presence of fluids. The exposed concrete surfaces are inspected daily to ensure surface integrity. The results of the inspection are recorded on Attachment 1.

#### ***4.18 Shredder Facility***

The Shredder Facility is used to size-reduce debris wastes prior to disposal. It is designed to provide free drainage to seven catchbasins, which then drain to the sump in the Rotary Dump Facility before being pumped into the Northwest Corner Evaporation Pond.

An alternate wastewater management system provides for the removal of water from manhole 1 via the use of a submersible pump and pipeline to water storage tanks located on the concrete pad. This system ~~will~~ may be used during the shredding of PCB waste or optionally when the drainage system to the Rotary Dump Facility or Northwest Corner Evaporation Pond is out of service. When in use, the alternate wastewater management system and associated valves will be inspected to ensure that the associated valves are in the proper position, the pipeline is not leaking, and the high water level alarms are not activated.

The facility is inspected daily to ensure free drainage of water from the shredder facility to the catchbasins. ~~In addition the~~ The water level within each catchbasin is inspected to ensure water is below the grate. Because the catchbasins are all located at least 3.5 feet lower in elevation than the top of Manhole 1, inspecting each catchbasin also functions as an inspection for functionality of the submersible pump in Manhole 1. The exposed concrete surfaces are inspected daily to ensure integrity. The results of the inspection are recorded on Attachment 1. When PCB-Containing waste is stored on the Shredder Pad, additional inspection criteria will be followed in accordance with the TSCA Approval for Shredding Polychlorinated Biphenyl (PCB) Wastes. The Facility Operator will inspect the facility prior to the end of shift to ensure that all outfeed material has been removed from the outfeed pad. The results of the inspection are recorded on Attachment 1.

The Shredder Facility is taken out of service and inspected annually during the second quarter, to ensure integrity of the concrete surfaces and to ensure that system valves are operating as designed. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report. Additional reporting may be required in accordance with the TSCA Approval for Shredding Polychlorinated Biphenyl (PCB) Wastes.

#### **4.19 Rotary Dump Facility**

The Rotary Dump Facility is designed and constructed for the thawing, emptying, and washing of railcars. It includes 4 sub-facilities. The Rotary Dump Facility is taken out of service and all areas are inspected annually during the second quarter, to ensure integrity of the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.

##### **4.19.1 Thaw Building**

The railcars enter the Thaw Building where wall and floor heaters provide heat as necessary to thaw the material for dumping. The rail in the thaw building is underlain with a flexible membrane liner covered with a granular surface. If any liquid is generated, the liquid drains into the granular surface, and is captured by the flexible

membrane liner. The liquid then gravity drains via perforated pipe installed above the flexible membrane liner to a collection pipe. The collection pipe located under the granular surface is covered with geotextile material to prevent intrusion from material that may block the pipe. The wastewater free drains via a four-inch PVC pipe that discharges to the West side of the Rotary Building floor. The pipe from the Thaw Building is located one foot off of the Rotary Building floor.

The concrete surface at the east end of the Thaw Building is inspected to ensure concrete integrity. The granular surface area is inspected daily for ponding of water to ensure free drainage to the Rotary Building Floor. The drainage pipe from the Thaw Building is inspected to ensure that no blockage exists. The results of the inspection are recorded on Attachment 1.

#### 4.19.2 Rotary Building

The Rotary Building is designed for the dumping of waste from railcars onto the Rotary Building Floor. While dumping is in process, water cannons may be used to remove excess material from the railcar. ~~It is anticipated that the water used by the water cannons will be absorbed into the dumped material and provide required dust suppression to reduce fugitive emissions.~~ The Rotary Building floor is sloped for free drainage of wastewater to the sediment basin. ~~Daily, upon completion of active waste management activities, an inspection is performed to ensure that no freestanding liquids exist on the building floor. Results of this inspection are recorded on Attachment 7.~~ Wastewater within the sediment basin is pumped via the use of a submersible pump and pipeline to the Northwest Corner Evaporation Pond or wastewater storage tanks at the Alternate Wastewater Management Area.

Routing of wastewater at the facility is controlled by locking valves. When the valve in the pipeline to the pond is in the "Closed" position and the valve in the pipeline to the tanks is in the "Open" position, the wastewater is transferred to the Alternate Wastewater Management Area. Notification to the ~~Executive Secretary~~ Director is required. When the locking valve in the pipeline to the tanks is in the "Closed" position and the valve in the pipeline to the pond is in the "Open" position, the wastewater is pumped to the Northwest Corner Evaporation Pond. The pipeline to the Northwest Corner Evaporation Pond is dual walled from the point where it exits the building to the discharge point in the pond.

~~The rotary building is inspected daily for active waste management. If active waste management is not being performed, the facility floor is inspected for the presence of free-standing liquid that may indicate lack of free drainage to the sediment basin. The leak detection system ports at the sediment basin are inspected for the presence of fluids. The water level within the sediment basin is inspected to ensure that the water level is maintained at or below the grate. The leak detection system, for the dual pipeline to the pond, is located in the southwest corner of the pit and is inspected by opening a valve to determine if water is present in the containment space between the pipes. The valve is closed when the inspection is completed. The results of the inspection are recorded on Attachments 1 and 7.~~

#### 4.19.3 Wash Building

The Wash Building is designed for the decontamination of railcars. Non-contaminated water is provided via four 2,500 gallon water storage tanks. Water used in the decontamination process gravity drains via two trenches to a drain pipe. Water from the drain pipe gravity drains to the sediment tank located on the floor of the rotary dump building. The sediment tank is designed with an overflow that drains from the sediment tank onto the Rotary Building floor surface to the sediment basin. Water within the sediment tank supplies the water cannons within the Rotary Building.

The wash building is inspected daily to ensure that the water free drains to the trenches and that the water level within the trenches remains below the grates. The concrete surface is inspected for integrity including all trenches and curbing at the east end of the building and surface seals around the stairway footing. The results of the inspection are recorded on Attachment 1.

#### 4.19.4 Alternate Wastewater Management Area

The wastewater from the sediment basin is transferred via submersible pump and pipeline to two wastewater storage tanks or to the Northwest Corner Evaporation Pond. A locking valve in the pipeline to the Alternate Wastewater Management Area (tanks) is opened and a locking valve in the pipeline to the pond is closed when the tanks are placed in service. Notification to the ~~Executive Secretary~~ Director is provided when the Alternate Wastewater Management Area is placed in service. Each tank is equipped with a float switch that triggers activation of a visual alarm when the water level reaches two feet from the top of the tank. The pipeline transfers wastewater to both tanks. Reuse of the wastewater from these storage tanks at the wash building is prohibited. The tanks are located on a concrete surface.

The Alternate Wastewater Management Area is inspected daily when in use indicated by the valve in the "Open" position, or marked N/A on the Daily Inspection Form when not in use. The facility is inspected daily when in service to ensure concrete surface integrity and maintenance of free drainage to the rotary building floor. The tanks are inspected for signs of leakage and to ensure that the visual alarms have not been activated. All valves and piping associated with the wastewater storage tanks are maintained to prevent wastewater from escaping the concrete surface. The results of the inspection are recorded on Attachment 1.

The Rotary Dump Facility will be taken out of service and inspected annually during the second quarter to ensure integrity of the ramps and the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs (if required) shall be made prior to resuming the use of the facility. The results of the inspection are documented. The annual inspection findings, any repairs required, and repairs completed will be included in the Semi-annual BAT Monitoring Report.

#### **4.20 East Side Drainage System**

The East Side Drainage System is comprised of two separate drainage systems, one for wastewater from decontamination facilities, and one for stormwater. The two drainage systems are designed to prohibit commingling, until released into the 1997 Pond. A process flow diagram of the system is provided as Figure 1.

The wastewater system is designed as follows: The wastewater is pumped from the Decontamination Access Control Building, the Intermodal Container Wash Building, and the Rail Wash Facility on Track No. 4 within a dual walled pipe system to the 1997 Pond.

The Decontamination Access Control Building Tank, Intermodal Container Wash Building, and the Rail Wash Facility on Track No. 4 are each equipped with shut-off (isolation) valves. These valves when closed will isolate the respective facilities thereby preventing the flow of additional wastewater via the pipelines to the 1997 Pond. This allows for the isolation of facilities and, upon notification to the DRC, manual removal of wastewater for continued operation if a BAT failure or maintenance outage exists at another facility connected to the drainage system or during scheduled maintenance or inspection of the drainage system.

##### **4.20.1 Decontamination Access Control Building Wastewater Flow and Monitoring**

Wastewater from the Decontamination Access Control Building drains to a double-walled collection tank outside of the building. A moisture leak detection sensor is located between the walls (annular) of the tank to detect moisture or leakage from the primary wall of the tank. A strobe alarm is located on the outside of the building adjacent to the tank that is activated by the sensor in the tank annular space. A second leak detection sensor is located within the containment pipe to detect a leak in the carrier pipe, which also activates the strobe alarm mounted on the outside of the building adjacent to the tank. A high water level float alarm set so as to maintain the water level in the tank below the level of the inlet pipe activates strobe alarms located inside the building above the boot wash and the respirator wash sink. An isolation valve (P1-V01) is located at the collection tank of the Decontamination Access Control Building. This isolation valve when closed will prevent additional wastewater from transfer to the Rail Wash Facility on Track No. 4.

##### **4.20.2 Rail Wash Facility on Track No. 4 Wastewater Flow and Monitoring**

Wastewater is pumped from the collection tank at the Decontamination Access Control Building to the Rail Wash Facility on Track No. 4 through a dual wall pipe designated as Pipeline No. 1. The inside pipe of the dual wall system is designated as the carrier pipe and the outer pipe is designated as the containment pipe. Pipeline No. 1 discharges into the wash water collection tank at the Rail Wash Facility on Track No. 4. Wastewater from the Rail Wash Facility on Track No. 4 collection tank is pumped through a dual wall pipe (Pipeline No. 2) to Manhole No. 1. An isolation valve (P2-V01), is located at the collection tank at the Rail Wash Facility on Track No. 4. This isolation valve when closed will prevent additional wastewater transfer via Pipeline No. 2 to Manhole 1.

#### **4.20.3 Intermodal Container Wash Building Wastewater Flow and Monitoring**

Wastewater from the Intermodal Container Wash Building sump is pumped to Manhole No 1 through a dual wall pipeline designated pipeline No 3 where it connects (via manifold) with Pipeline No 4. An isolation valve (P3-V01) is located at the sedimentation sump in the Intermodal Container Wash Building. This isolation valve will prevent additional wastewater from transfer via Pipeline No. 3 to Manhole No 1 when closed.

#### **4.20.4 Manhole No. 1 Wastewater Flow and Monitoring**

Manhole No 1 is a dry manhole (receives no storm or wastewater) that provides access to a manifold system connecting pipelines No 2, 3, and 4. Manhole No 1 is located in close proximity to the Rail Wash Facility on Track No 2 near the SW corner of the building. Within Manhole 1, dual wall pipelines No 2 and No. 3 are joined with a manifold and exit the manhole as dual wall Pipeline No. 4 routed to the 1997 Pond. Check valves prevent water from backflowing into Pipelines No 2 and No 3. Wastewater flows from Manhole No 1 to Manhole No 2 via Pipeline No 4 then to the 1997 Pond via the dual wall pipe designated as Pipeline No 4a. A leak detection sensor and drip leg (2 total) is installed in each containment pipe of Pipelines No 2 and No 3 at Manhole No 1 to detect leakage from the carrier pipes. The sensors activate a strobe alarm mounted to the exterior of the adjacent Rail Wash Building. In addition, a sight canister is installed on each drip leg to collect any water, for visual detection, that may flow from the drip leg.

#### **4.20.5 Manhole No. 2 Wastewater Flow and Monitoring**

Pipeline 4 carries wastewater to Manhole 2 located north of the 1997 Pond. Pipeline 5 carries stormwater from the stormwater collection/transfer sump to Manhole No 2. Pipelines No 4a and No 5a carry wastewater and stormwater from Manhole 2 to the 1997 Pond. The carrier pipelines pass through Manhole 2, keeping Manhole 2 dry and the water streams separate. A leak detection sensor and drip leg (4 total) is installed in each containment pipe of Pipelines No 4, No 4a, No 5 and No 5a at Manhole No 2 to detect leakage from the carrier pipes. The sensors activate a strobe alarm mounted on a post adjacent to Manhole 2. In addition, a sight canister is installed on each drip leg to collect any water, for visual detection, that may flow from the drip leg.

#### **4.20.6 Stormwater Lift Sump Flow and Monitoring**

Stormwater is collected by the catchbasins located south of the Intermodal Container Wash Building, north and south of the Intermodal Unloading Facility, and between Tracks 2 and 3 and routed to the stormwater lift sump. The collected water is pumped from the sump and routed to the 1997 Pond through Pipeline No 5.

A high water level float alarm is installed in the stormwater lift sump to indicate high water conditions within the sump due to system failure. The alarm activates a strobe alarm mounted to a post adjacent to the sump. If the high water level alarm is activated at the stormwater lift sump, ponding will occur at the catchbasins before water will overtop the stormwater lift sump. The alarm is inspected during the second week of each month.

#### 4.20.7 Stormwater Drainage System Daily Inspections

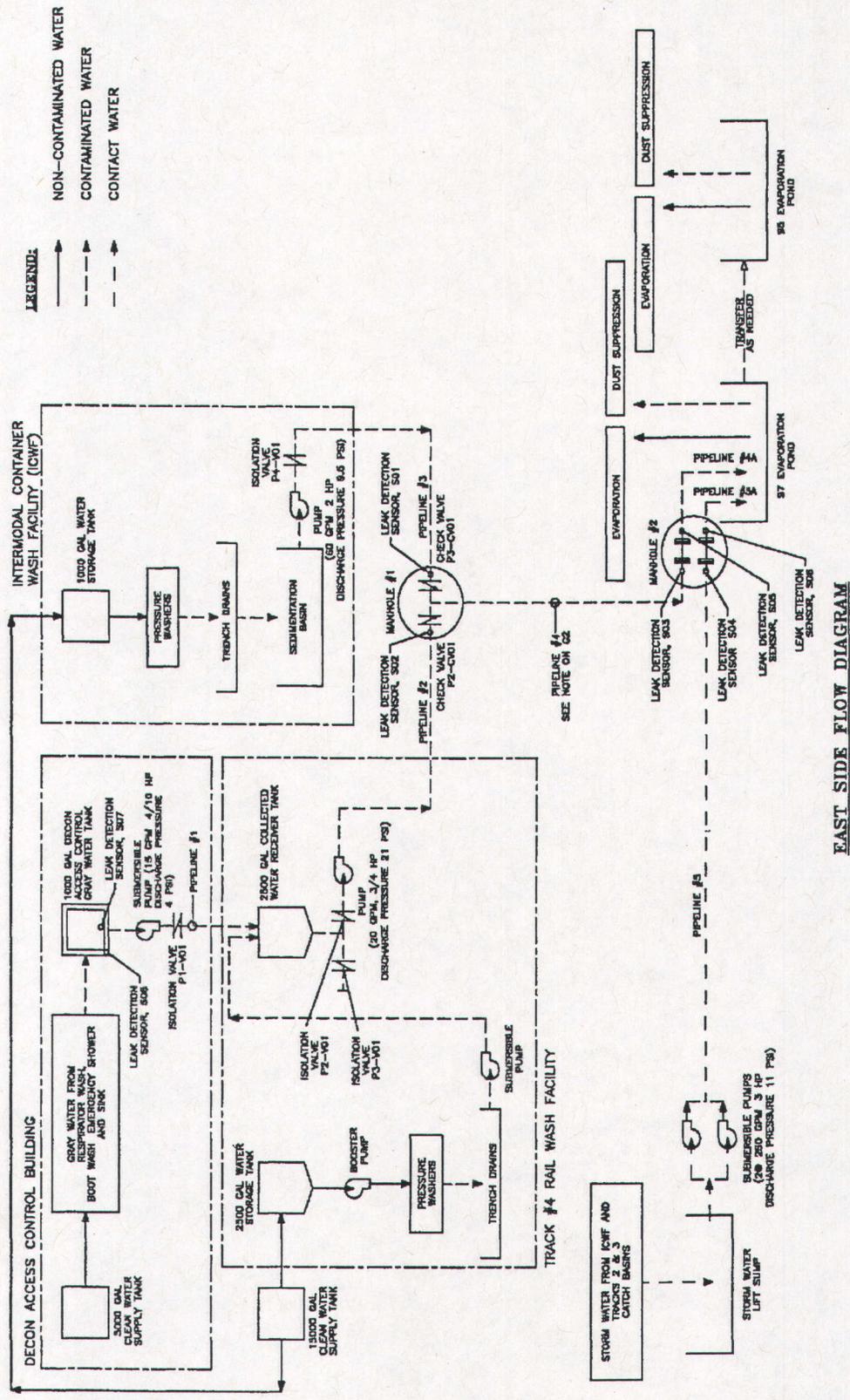
The East Side drainage system is inspected ~~daily~~ to ensure the free drainage of stormwater from the area south of the Intermodal Container Wash Building, the areas north and south of the Intermodal Unloading Facility and the area between Tracks No's 2 and 3 to the stormwater lift sump and the 1997 Pond. In addition, an ~~daily~~ inspection is performed for the activation of strobe alarms for indication of water within the carrier pipe of the dual wall pipelines at Manholes 1 and 2 and the gray water tank at the Decon Access Control Building. An ~~daily~~ inspection is also performed of the high water level alarm at the Lift Station. The results of the inspection are recorded on Attachment 1.

#### 4.20.8 ~~Weekly-Drip Leg Inspections~~

The drip leg collection sight canisters located within Manholes 1 and 2 and the Decon Access Control Building gray water tank will be visually inspected ~~weekly~~ for the presence of water. The results of the inspection are recorded on Attachment 1.

#### 4.20.9 Annual Pipe Pressure Testing

All carrier pipes (Pipelines No 1, No. 2, No 3, No 4, No 4a, No 5 and No 5a) within the East Side Drainage System will be pressure tested annually during the third quarter of the calendar year to ensure integrity. The Time-Pressure Drop method described in ASTM F1417 shall be used to determine the test criteria. In addition, the leak detection probes (8 total) will also be inspected and tested annually at the same time as the pipe pressure testing. ~~The testing shall be conducted under the direction of a certified Professional Engineer qualified to perform pipe integrity testing.~~ Notification of shut down of the system for testing purposes will be provided at least 48 hours prior to the ~~Executive Secretary~~ Director. A written report including ~~certified~~ test results will be submitted as part of the Semi-annual BAT Monitoring Report.



**LEGEND:**

- NON-CONTAMINATED WATER
- - - CONTAMINATED WATER
- - - CONTACT WATER

**FIGURE 1 - EAST SIDE FLOW DIAGRAM**

**EAST SIDE FLOW DIAGRAM**

#### 4.21 South Ditch

The Vitro drainage ditch culvert replacement (hereafter referred to as the South Ditch) was constructed to reduce a potential source of groundwater mounding near well GW-60. Since the ditch does not entirely free drain, the ditch contains a sump to lift remaining water from the ditch to the Southwest Corner Pond. The Southwest Corner Pond is a non-contact water collection and storage pond outside the restricted area and is not subject to the Ground Water Quality Discharge Permit. The pump will be removed from the sump during freezing weather. When the pump is removed, manual water removal will occur within the same working day after water is discovered to be above the sump grate. The South Ditch will be inspected when storm water has accumulated on site. Storm water accumulation is recorded on Attachment 1 as a general inspection item. The strobos, pump, and sump grate will be inspected during the second week of each month. Results will be recorded on Attachment 1.

#### 4.22 LLRW Operations Building

Wastewater from the restricted area of the LLRW Operations Building drains to a 2,500 gallon double-walled collection tank outside of the building. A moisture leak detection sensor is located at the bottom of the tank between the walls (annular space) of the tank to detect moisture or leakage from the primary wall of the tank. A strobe alarm is located adjacent to the tank is activated by the sensor in the tank annular space. A high level float alarm (orange strobe) is set to indicate when the tank is three-quarters full (approximately 625 gallons remaining capacity). A high-high-level float alarm (red strobe) is set just below the maximum capacity of the tank (approximately 125 gallons remaining capacity). The LLRW Operations Building visual alarms will be inspected daily for activation. ~~Weekly inspections of the~~ The bootwash and sample prep room floor drain will be ~~performed~~ inspected to ensure free drainage. These are the lowest elevation floor drains in the building, and therefore will provide the earliest indication if the tank is overfilled. Results will be recorded on Attachment 1. An annual inspection of the alarms (high level, high-high-level, and moisture sensor) will be performed within the third quarter. A written report including test results will be submitted as part of the Semi-annual BAT Monitoring Report.

#### 4.23 SRS DU Storage Building

The SRS DU Storage Building is designed to protect SRS DU waste from the elements. The storage building is a steel building on concrete foundation with an asphalt floor. The building will be inspected weekly to ensure that walls and roof are free from holes. The floor will be inspected for the presence of water. The containers will be inspected for evidence of leaks, corrosion, or deterioration. The results of the inspection are recorded on Attachment 16.

#### ***4.24 Evaporation Pond Ancillary Equipment to Facilitate Evaporation***

Ancillary equipment intended to facilitate evaporation at all Evaporation Ponds is constructed of UV resistant, PVC piping that is set a minimum of 2 feet from the top of berm. The inlet pipe is located over a rub sheet to protect the liner. Water is conveyed to the piping and fed back into the pond. The ancillary equipment is inspected ~~daily~~ to ensure that the system is working as designed, no liner damage is present, and no spillage of water has occurred from within secondary containment.

24 hours prior to use of ancillary equipment at an approved evaporation pond, verbal or email notification will be provided to DRC in order to provide opportunity for inspection.

Any proposed change in a test design or construction of ancillary equipment at an evaporation pond must adhere to the following BAT principles:

- Equipment that conveys contact wastewater (such as pumps, pipe, hoses, etc.) and is not located directly on the pond liner shall be placed inside a watertight secondary containment system that drains into the pond.
- Equipment that is placed onto or over the pond liner shall be placed so that the integrity of the pond liner is protected, i.e., placed on rub sheets or otherwise arranged to minimize the potential for the pond liner to be damaged.
- Spillage of contact wastewater outside of the pond or secondary containment or damage to the pond liner shall be responded to in accordance with the BAT Contingency Plan.

#### ***4.25 Stormwater Management***

The Clive facility is inspected ~~daily~~ weekly and after precipitation events of greater than 0.1 inch for the accumulation of stormwater. Water management personnel collect and transfer stormwater from within the restricted area to the evaporation ponds. Collected stormwater and water contained within the evaporation ponds may also be used for minimal engineering and dust control purposes at the Class A and Class A North embankments and for dust suppression activities at the Shredder Facility. The management of stormwater at the facility shall occur according to the following requirements:

Stormwater runoff at the Class A, Class A North, and 11e (2) Disposal Cells which has contacted the waste (i.e. contact stormwater), shall be contained. The priority schedule listed below shall be followed for removal of stormwater that falls inside the restricted area. This includes runoff from waste disposed in excavated, below grade areas of the Disposal Cells.

Within 24 hours of discovery of any accumulation of contact stormwater, removal of said wastewater shall commence. Wastewater removal shall occur in accordance with the priority list below.

- 1) Contact stormwater inside the footprint of the Class A, Class A North, and 11e (2) Disposal Cells
- 2) Contact stormwater at the Rail Rollover and Rotary Dump Facility
- 3) Contact stormwater at the Intermodal Unloading Facility
- 4) Contact wastewater at any facility (e.g. BAT Failures, facility maintenance, etc.)
- 5) Non-contact stormwater within the restricted area

If water removal equipment is not effective for use at higher priority water accumulation areas, said equipment may be used at the next lower priority location where it will be effective provided that higher priority collection is not interrupted. This is defined as a bypass of priority collection (e.g., if water removal equipment cannot navigate the terrain in the embankments, it can be used to remove water from a priority two location, if necessary, or if a pump is not usable to transfer water at a priority one location and cannot be used at a priority two location, it can be used at the priority three location, or the next lower priority, where it will be effective).

If conditions improve so that water removal equipment can now access or be used at the previous higher priority inaccessible area, the water removal equipment will return to the high priority area immediately.

Within 24 hours the ~~Director of LLRW Operations~~ Manager, Compliance and Permitting or designee shall provide notification and justification to the ~~Executive Secretary~~ Director whenever equipment bypasses a higher priority for use at a lower priority location.

Approval must be obtained from the ~~Executive Secretary~~ Director to interrupt (stop) collection from a higher priority location for the purpose of collecting water from a lower priority location.

If stormwater removal at a lower priority location interrupts listed higher priority collection without required approvals, contingency actions shall be performed in accordance with the BAT Contingency Plan.

## 5 EQUIPMENT MAINTENANCE

Equipment corrective and preventative maintenance is performed, as needed. Spare sump pumps and replacement parts (including batteries for portable measuring devices, etc.) are on site at all times for required repairs.

## 6 QUALITY ASSURANCE/QUALITY CONTROL

The Quality Assurance Manager or designee will conduct surveillance activities to ensure the requirements of the BAT Performance Monitoring Plan have been implemented, as required. Surveillance activities will be performed in accordance with the currently approved Quality Assurance Program Document. ~~The Quality Assurance Manager or designee will also perform reviews of inspection forms for accuracy and completeness.~~

~~The applicable site director or designee will conduct a biweekly (once every two weeks) assessment of the BAT Performance Monitoring Plan to ensure inspection activities are performed in accordance with this plan. Biweekly assessments will be conducted in accordance with currently approved procedures. The applicable site director or designee will also perform reviews of inspection forms for accuracy and completeness.~~



Inspect the following areas for compliance with the Radioactive Material License and Groundwater Quality Discharge Permut. Indicate areas inspected in the section below. BAT inspections are required to be performed once per week and after precipitation events of greater than 0.1 inch.

Inspector \_\_\_\_\_  
 Print \_\_\_\_\_ Sign \_\_\_\_\_ Date \_\_\_\_\_

Summary of findings (include description of BAT failures, adverse weather, etc )


**General Inspection Items**

Inspection Item	Input	Action Required
Shredder Out-feed Pad cleared by end of shift (if not operated previous shift then check "N/A")	Yes <input type="checkbox"/>	If no, notify individuals to resolve (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Stormwater Accumulation within the LLRW/11e (2) Restricted Area Boundary	Yes <input type="checkbox"/>	If yes, perform South Ditch Inspection and complete and attach CL-LD-PR-704-F1, <i>Stormwater Accumulation Inspection and Collection Form</i> to this report
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Will full containers on ground (outside approved storage) expire past the approved 48 hour time limit before the next scheduled daily inspection?	Yes <input type="checkbox"/>	If yes, notify individuals to resolve (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Vitro Ditch line free of dirt, debris, and other obstructions	Yes <input type="checkbox"/>	If no, notify individuals to resolve (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Date of next weekly inspection		If date of next inspection falls on a weekend or company holiday, schedule the inspection to occur on a work day <b>prior to the deadline</b>
Date of next monthly inspection		

Reviewed by \_\_\_\_\_  
 Manager, Waste Disposal Operations \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

# South Ditch

Date: \_\_\_\_\_

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Date last Inspected		
South Ditch Inspected monthly (during the second week of each month)?	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Does the South Ditch require inspection? (If stormwater accumulation or approaching monthly deadline then inspection is required)	Yes <input type="checkbox"/>	If yes, perform appropriate checklist below (Document notifications as required)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
<b>Checklist for Monthly Inspection</b>		
Is the pump operational and do the indicator lights function when the floats are lifted? Check "N/A" if pump is not installed	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Is the grate more than 75% free of debris (inspect for rocks, plant material, or other items that may impede drainage) Check "N/A" if pump is not installed
<b>Checklist for Stormwater Accumulation Inspection</b>		
Is the pump operating (check indicator lights on process controller and check for water flow near the west culvert at the SW Corner Pond)?	<input type="checkbox"/> N/A Water has not collected in the sump	
	<input type="checkbox"/> Yes Everything is fine, no action required	
	<input type="checkbox"/> No The pumps have been removed (Notify Manager, Waste Disposal Operations)	
	<input type="checkbox"/> No The pumps are not working (Notify Manager, Waste Disposal Operations)	
South Ditch Pump System functional (from checklists above)?	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Observations		

# LLRW Operations Building

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
High-level water alarm (orange) activated at the wastewater storage tank?	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
High-High water level alarm (red) activated at the wastewater storage tank?	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Leak Detection Alarm activated at the wastewater storage tank?	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Bootwash and Emergency Shower Drain in the Sample Prep Room inspected for free drainage?	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last inspected		
Observations		

# Evaporation Ponds

<b>Meters and Fluid Head</b>				
Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Inspection Time				
Leak Detection Meter Reading				
Previous Reading				
Difference				
Allowable Difference	155	160	355	300
Process Controller Display Value				
If the leak detection difference is over the allowable limit or the display value is greater than 10, Notify Applicable Site Director or Designee			Notification made (Person, Date, Time)	
<b>Freeboard</b>				
Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Indicate freeboard level for each pond				
Freeboard levels at three foot marking	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
Freeboard levels less than 24"	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
If "Yes" is checked on any item above, notify Manager, Waste Disposal Operations			Notification made (Person, Date, Time)	
<b>Ancillary Equipment Check</b>				
Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Is pond liner integrity maintained during ancillary equipment use (if not in use mark "N/A")	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>
If "No" is checked on any item above, notify Manager, Waste Disposal Operations			Notification made (Person, Date, Time)	
<b>Pumpback Pipeline Check</b>				
Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Date of last pumpback test				
Test completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
Pumpback Pipeline free from leaks (if water was not removed during test, mark "N/A")	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>
If "No" is checked on any item above, notify Manager, Waste Disposal Operations			Notification made (Person, Date, Time)	
Observations				

Date: \_\_\_\_\_

**2000 Pond Transfer Pad**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Free drainage from pad to sump	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Level of water in sump below the grate	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Exposed Concrete Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Observations		

**NWC Pond Transfer Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Concrete pad and HDPE Seam inspected monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last check completed		
Exposed Concrete Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Tears, gaps, or holes in HDPE/concrete seam on the west side of the concrete apron	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Observations		

**Pond Lift Station**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Lift Station Visual Alarm activated	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	Fix <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Observations		

Date: \_\_\_\_\_

**Rail Rollover Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Ponded water present within the covered area	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Sump Pump Operational (Water level below grate)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free Drainage from berm to trough, through settling basin, to sump	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Berm, trough, sumps, and settling basin cleaned weekly	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last cleaned		
Observations		

**East Side Drainage Manhole 1**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Strobe alarm activated (check both lights)	Yes <input type="checkbox"/>	If yes, document which light and notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	Fix <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Water present within any of the Drip Leg sight canisters (use checklist below)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
<b>Drip Leg (sight canister) Inspection Checklist - Manhole 1</b>		
Drip Leg (sight canister) No 1	Yes <input type="checkbox"/>	Drip Leg (sight canister) No 2
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
		Yes <input type="checkbox"/>
		No <input type="checkbox"/>
		N/A <input type="checkbox"/>
Observations		

Date: \_\_\_\_\_

# Stormwater Lift Sump

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Lift Station Alarm activated	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	Fix <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Observations		

# East Side Drainage Manhole 2

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required	
Strobe alarm activated (check both lights)	Yes <input type="checkbox"/>	If yes, document which light and notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
Date last alarm check completed			
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification)	
	Fix <input type="checkbox"/>		
	N/A <input type="checkbox"/>		
Water present within any of the Drip Leg sight canisters (use checklist below)	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification)	
	No <input type="checkbox"/>		
	N/A <input type="checkbox"/>		
<b>Drip Leg (sight canister) Inspection Checklist - Manhole 2</b>			
Drip Leg (sight canister) No 3	Yes <input type="checkbox"/>	Drip Leg (sight canister) No 5	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
	N/A <input type="checkbox"/>		N/A <input type="checkbox"/>
Drip Leg (sight canister) No 4	Yes <input type="checkbox"/>	Drip Leg (sight canister) No 6	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
	N/A <input type="checkbox"/>		N/A <input type="checkbox"/>
Observations			

Date: \_\_\_\_\_

**IUF Lift Station**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Lift Station Visual Alarm activated	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification)
	No <input type="checkbox"/>	
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification)
	Fix <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Observations		

**Containerized Waste Storage Pad**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Pad free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Exposed Pad Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Sump Operational (level in sump below the grate)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free Drainage to sump	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Container Storage less than 365 days	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Containers properly stored (use checklist below)	Yes <input type="checkbox"/>	If no, notify individuals to resolve (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	

**Containerized Waste Storage Pad Storage Checklist**

2' aisle spacing between rows	Yes <input type="checkbox"/>	Drums stacked to a maximum of 2 containers high	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
	N/A <input type="checkbox"/>		N/A <input type="checkbox"/>
Minimum of 2' maintained from edge of pad	Yes <input type="checkbox"/>	Containers show no evidence of leaks, corrosion, or deterioration	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
	N/A <input type="checkbox"/>		N/A <input type="checkbox"/>
Minimum of 20' maintained from railroad track	Yes <input type="checkbox"/>	Container lids are sealed	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
	N/A <input type="checkbox"/>		N/A <input type="checkbox"/>
Containers at or below 10' above pad surface	Yes <input type="checkbox"/>	Containers properly labeled (identified by generator, waste stream, and date arrived)	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
	N/A <input type="checkbox"/>		N/A <input type="checkbox"/>

Observations			

Date: \_\_\_\_\_

**Box Washing Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Sump Operational (Water level below the grate)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free Drainage to sump	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pad free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Exposed Concrete Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Water level of the concrete holding tanks maintained at or below three-quarters full	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pipeline cap from the building intact	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Observations		

**Intermodal Unloading Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Sump Operational (Water level below the grate)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free Drainage to sump	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pad free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Exposed Concrete Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Observations		

Date: \_\_\_\_\_

**East Truck Unloading Area**

Inspection Time: \_\_\_\_\_

Inspection Item	Input		Action Required
Troughs less than three-quarters full	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Free Drainage	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Pad free of soil, debris, etc	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
Exposed Pad Integrity including the container holding pads, troughs, curbing, and dock	OK <input type="checkbox"/>	No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Containers temporarily placed on asphalt surfaces have current date on the Bates Label	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Container Storage less than 365 days	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Containers properly stored (use checklist below)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	If no, notify individuals to resolve (indicate person, date, and time of notification below)
<b>East Truck Unloading Area Storage Checklist</b>			
2' aisle spacing between rows	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Drums stacked to a maximum of 2 containers high
	N/A <input type="checkbox"/>		
Maintained over concrete surfaces	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Containers show no evidence of leaks, corrosion, or deterioration
	N/A <input type="checkbox"/>		
Minimum of 20' maintained from railroad track	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Container lids are sealed
	N/A <input type="checkbox"/>		
Containers at or below 10' above pad surface	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Containers properly labeled (identified by generator, waste stream, and date arrived)
	N/A <input type="checkbox"/>		
Observations			

Date: \_\_\_\_\_

**Decontamination Access Control Building**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required	
Visual Strobe outside building activated for leak detection	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
Drip Leg (sight canister visual inspection (weekly) Water present within the Drip Leg (sight canister) No 7	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
	N/A <input type="checkbox"/>		
Free drainage of waste water drain lines (Use checklist below)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
<b>Waste Water Drain Line Checklist</b>			
Free drainage from boot wash	Yes <input type="checkbox"/>	Free drainage from shower	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
Free drainage from respirator sink	Yes <input type="checkbox"/>	Free drainage from sink next to shower	Yes <input type="checkbox"/>
	No <input type="checkbox"/>		No <input type="checkbox"/>
Visual alarm for water level activated (located inside building above boot wash and above respirator wash sink)	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)	
	No <input type="checkbox"/>		
Date last alarm check completed			
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification)	
	Fix <input type="checkbox"/>		
	N/A <input type="checkbox"/>		
Observations			

**Stormwater Drainage System (between tracks 2 and 3)**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Water level in each catch basin above the top level of the outlet pipe	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Observations		

Date: \_\_\_\_\_

**Rail Digging Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Free Drainage to collection basins	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Water level in collection basins below the grate	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Water level in settling basin below the elevation of the outlet pipe	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Leakage at digging facility manhole	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pad free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Exposed Surface Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Observations		

**Intermodal Container Wash Building**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Leak Detection System Port 1 and Port 2 free of fluid	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free drainage from the wash bay through troughs to sediment basin	Yes <input type="checkbox"/>	If no, place out of service, notify individuals to resolve by end of day, place back in service
	No <input type="checkbox"/>	
Level of water within sediment basin sump below the level of the weir grate	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free drainage from boot washes to troughs	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pad and concrete surfaces free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Exposed concrete surface integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Observations		

Date: \_\_\_\_\_

**Rail Wash Facility on Track No. 4**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Sump Operational (water level below grate)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free Drainage to sump	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pad free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Exposed Concrete Pad and Sump Integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Gray water discharge pump functioning properly (water level at or below pump activation level)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Tank Level Alarm activated	Yes <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification)
	Fix <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Observations		

**Shredder Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Water level below the level of each catch basin grate (use checklist below)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
<b>Shredder Facility Drainage System Checklist</b>		
Catch basin 1	Yes <input type="checkbox"/> No <input type="checkbox"/>	Catch basin 5
Catch basin 2	Yes <input type="checkbox"/> No <input type="checkbox"/>	Catch basin 6
Catch basin 3	Yes <input type="checkbox"/> No <input type="checkbox"/>	Catch basin 7
Catch basin 4	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Exposed Pad and concrete surfaces free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in observations
	No <input type="checkbox"/>	
Exposed concrete surface integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	

Continued on the following page

Shredder Facility Continued: PCB Management Requirements at the Shredder Facility		
Is PCB Waste present on the in feed or out feed pads?	Yes <input type="checkbox"/> No <input type="checkbox"/>	If yes, perform the inspections below If no, mark items "N/A"
Date PCB Waste Initiated		
Is date of inspection greater than 75 days of PCB Waste Management Initiation	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Wastewater valve to the Rotary Dump Facility in the closed position	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Wastewater valve to the water storage tanks in the open position	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Facility labeled as PCB waste or PCB waste segregated from other waste types with ropes or jersey barriers	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Wastewater Storage Tank Inspection		
Is wastewater stored within the storage tanks	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If yes, perform the inspections below If no, mark "N/A" for items below
Is water storage tank labeled as PCB Waste if required	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Pipeline from manhole 1 to water storage tanks free from leakage	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
High Water Level Alarm activated at storage tanks	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/> Fix <input type="checkbox"/> N/A <input type="checkbox"/>	If Fix, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification)
Observations		

Date: \_\_\_\_\_

**Rotary Dump Facility**

Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
<b>Wash Building</b>		
Free drainage from floor to the trenches	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free drainage from the trenches to the sediment tank drain line (Water level at or below the grates)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Pad and concrete surface free of soil, debris, etc	Yes <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
	No <input type="checkbox"/>	
Integrity of concrete curb along east end	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Exposed concrete surface integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Surface Seal Around Stairway Footing	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
<b>Rotary Building</b>		
Drainpipe from Thaw Building on the west wall is free from waste material	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Free drainage from Rotary floor to the sediment basin (No ponding of water) If active waste management at time of inspection mark "N/A"	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
	N/A <input type="checkbox"/>	
Sump pump operational (water level below the grate)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Leak Detection System Port 1 and 2 free of fluid	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Leak detection system for pipeline from facility to NWCP free of fluid (turn valve at SW Corner and return)	Yes <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Exposed concrete surface integrity	OK <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
	No <input type="checkbox"/>	
Locking Valve in pipeline from sediment basin to water storage tanks in the "Open" position	Yes <input type="checkbox"/>	If yes, perform inspection of Alternate Wastewater Management Area below If no, Mark "N/A" for the items below
	No <input type="checkbox"/>	

Continued on the following page

Date: \_\_\_\_\_

Rotary Dump Facility Continued: Alternate Wastewater Management Area		
Pipeline from sediment basin to water storage tanks free from leakage	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
High Water Level Alarm activated at one or both storage tanks	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Alarm check completed monthly (during the second week of each month)	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Date last alarm check completed		
Alarm Check (Visual)	OK <input type="checkbox"/> Fix <input type="checkbox"/> N/A <input type="checkbox"/>	If Fix , notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Free drainage from concrete surface to drainpipe and onto the rotary building floor (No ponding of water)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Pad and concrete surface free of soil, debris, etc	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
Exposed concrete surface integrity	OK <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
<b>Thaw Building</b>		
Free drainage from Thaw Building to Rotary Building floor (no ponding of water on the granular floor surface)	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Concrete surface on East end free of soil, debris, etc	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, have area cleaned for inspection and record completion in Observations
Exposed concrete surface integrity	OK <input type="checkbox"/> No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations(indicate person, date, and time of notification below)
Observations		

# DU Storage Building

Date: \_\_\_\_\_  
 Inspection Time: \_\_\_\_\_

Inspection Item	Input	Action Required
Exposed floor integrity and design grade (check for cracks, heaves, or divots in the surface)	OK <input type="checkbox"/> Fix <input type="checkbox"/>	If fix, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Walls and roof are free of holes and open areas that cannot be closed	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Containers show no evidence of leaks, corrosion, or deterioration	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, notify individuals to resolve (indicate person, date, and time of notification below)
Containers are properly sealed	Yes <input type="checkbox"/> No <input type="checkbox"/>	If no, notify individuals to resolve (indicate person, date, and time of notification below)
Presence of water within the building	Yes <input type="checkbox"/> No <input type="checkbox"/>	If yes, notify Manager, Waste Disposal Operations (indicate person, date, and time of notification below)
Observations		



**Evaporation Pond(s) Leak Detection System Volume  
Weekly Calculation Form**

**Facility Operator** \_\_\_\_\_ **Date** \_\_\_\_\_

Day of Week	Date	1995 Flow Meter Reading	1997 Flow Meter Reading	2000 Flow Meter Reading	NWCP Flow Meter Reading
Previous Day 7					
Day 1					
Day 2					
Day 3					
Day 4					
Day 5					
Day 6					
Day 7					
<b>Total Change</b> (Day 7 - Previous Day 7)					
<b>Average Leak Rate:</b> (Total Change / 7 = Gallons / day)					

<b>1995 Evaporation Pond</b>	If average leak rate is above 155 gallons/day, notify Manager, Waste Disposal Operations for performance of pump test If average rate is above 162 gallons/day, notify Manager, Waste Disposal Operations
	Notification Made (Date, Time, Name)   _____
<b>1997 Evaporation Pond</b>	If average leak rate is above 160 gallons/day, notify Manager, Waste Disposal Operations for performance of pump test If average rate is above 171 gallons/day, notify Manager, Waste Disposal Operations
	Notification Made (Date, Time, Name)   _____
<b>2000 Evaporation Pond</b>	If average leak rate is above 355 gallons/day, notify Manager, Waste Disposal Operations for performance of pump test If average rate is above 382 gallons/day, notify Manager, Waste Disposal Operations
	Notification Made (Date, Time, Name)   _____
<b>NWC Evaporation Pond</b>	If average leak rate is above 300 gallons/day, notify Manager, Waste Disposal Operations for performance of pump test If average rate is above 326 gallons/day, notify Manager, Waste Disposal Operations
	Notification Made (Date, Time, Name)   _____

**Reviewed By** \_\_\_\_\_ **Date:** \_\_\_\_\_  
 Manager, Waste Disposal Operations





Collection Lysimeter Free Liquids Monitoring

Monitoring Personnel \_\_\_\_\_

Collection Lysimeter Identification Number	Date	Time	Free Liquids (y/n)	Depth To Water Measurement (feet)	Collection Lysimeter Total Depth (feet)	Total Water Volume Removed (mls)
CL-1						
CL-2						
CL-3						
CL-4						
CL-5						
CL-6						
CL-W1						
CL-W3						
CL-W4						
CL-W5						
CL-W6						
CL-W7						
CL-W8						
CL-N1						
CL-N2						
CL-N3						
CL-N4						
CL-N5						
CL-N6						
CL-N7						
CL-N8						

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Reviewed By: \_\_\_\_\_ Date \_\_\_\_\_  
 Manager, Compliance and Permitting

Permit No UGW450005

APPENDIX K

Groundwater Quality Discharge  
Permit BAT Contingency Plan

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## 1 INTRODUCTION

EnergySolutions, LLC (EnergySolutions) has been granted a Groundwater Quality Discharge Permit, (GWQDP) Permit No UGW450005 hereinafter called the Permit by the State of Utah. The Permit specifies the construction, operation, and monitoring requirements for all facilities at the Clive site that have a potential of discharging pollutants that may move directly or indirectly into groundwater. To cause the maximum reduction of pollutants achievable, the Permit specifies that "Best Available Technology" (BAT) be used in the construction of all facilities and that facilities be operated according to "Best Management Practices". To demonstrate compliance with BAT requirements and performance standards, EnergySolutions shall implement a BAT Performance Monitoring Plan in accordance with the Permit. In the event of a BAT failure at any facility, the following Contingency Plan will be implemented.

This Contingency Plan provides direction to EnergySolutions personnel as to contingency actions required for maintaining or regaining compliance with the GWQDP BAT requirements. The timely execution of contingency and corrective actions outlined in this Contingency Plan will provide EnergySolutions with the basis to exercise the Affirmative Defense provision in the Permit and thereby avoid noncompliance status and potential enforcement action.

## 2 DEFINITIONS

**Contingency Action:**

Actions performed to eliminate an existing threat or potential threat to human health and/or the environment and regain compliance with BAT as defined in the Permit.

**Corrective Action:**

Actions required for regaining or maintaining compliance with all licenses and permits.

**Discharge:**

The release of a pollutant directly or indirectly into subsurface waters of the state.

**Best Available Technology:**

The application of design, equipment, work practice, operation standard, or combination thereof, at a facility to effect the maximum reduction of a pollutant achievable by available processes and methods taking into account energy, public health, environmental and economic impacts and other costs.

**Contingency Plan:**

A plan for regaining and maintaining compliance with the permit limits and for reestablishing best available technology as defined in the Permit.

**Discrepancy in Pad Integrity:**

Either. 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width) or 2) any significant deterioration or damage of the pad surface

**3 RESPONSIBILITIES**

Responsibilities are provided in the BAT Performance Monitoring Plan

~~The **Director of Mixed Waste Operations and Director of LLRW Operations** (or designees) are responsible for maintaining assigned facilities in compliance with BAT requirements of the Clive site at all times. The applicable site director (or designee) shall immediately notify the QAM when any BAT Failure occurs.~~

~~The **Quality Assurance Manager (QAM)** or designee is responsible for providing verbal notifications required under the GWQDP, and the performance of surveillance and/or audit activities to verify implementation and compliance with the requirements of this plan. The QAM may provide verbal notification to the regulatory agencies, and will also review corrective actions proposed to ensure compliance with all licenses and permits.~~

~~The **Director of Compliance and Permitting** or designee in cooperation with the Corporate Radiation Safety Officer or designee is responsible for the determination of sample analytical priorities from fluid collected at collection lysimeters and providing verbal and written notification of any non-compliance for the Clive Facility.~~

~~The **Director of Health Physics (DHP)** or designee in cooperation with the Director of Compliance and Permitting or designee is responsible for the determination of sample analytical priorities from fluid collected at collection lysimeters.~~

~~The **Document Control Manager** or designee is responsible for filing all associated documentation of this plan in the site operating record.~~

~~The **Director of Engineering** or designee is responsible for conducting the pump down test for the leak detection system of the Evaporation Ponds if necessary and conducting all corrective actions regarding pond systems.~~

~~The **BAT Inspector** or designee is responsible for performing routine daily inspections and providing notification to the Applicable Site Director or designee of any non-compliance.~~

~~The **Facility Operator** is responsible for maintaining BAT compliance at all times and providing notification to the Applicable Site Director or designee of any non-compliance. The responsibilities listed for this position include Facility Operators performing operations at the Mixed Waste Facility.~~

~~The **Maintenance Manager** or designee is responsible for performing preventative maintenance on facility equipment in accordance to the manufacturer specifications and~~

guidelines, and ensuring that spare sump pump and replacement parts (including batteries for portable measuring devices, etc.) are on site at all times for required repairs.

#### 4 CONTINGENCY PLAN

EnergySolutions is responsible for implementing the contingency plan for any identified failure of BAT in accordance with the BAT Performance Monitoring Plan. The contingency actions required for failures of BAT are listed below by facility.

##### 4.1 All Evaporation Ponds:

##### 4.1.1 Evaporation Pond Freeboard Level at Three Feet

- 1 ~~The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately~~~~

##### 4.1.2 Evaporation Pond Freeboard Exceedance

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~.
- 2 The Manager, Waste Disposal Operations will immediately direct the removal of water from the pond via pumping until the minimum freeboard level is obtained, if approved water storage capacity is available. Water from the evaporation pond with a freeboard exceedance may be stored in another approved evaporation pond.
- ~~3~~ The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~
- ~~3~~ 4 ~~The QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification~~
- ~~4~~ 5 ~~The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery~~
- ~~5~~ 6 ~~The Applicable Site Director or designee will immediately authorize and direct the removal of water from the pond via pumping until the minimum freeboard level is obtained. Water from the evaporation pond with a freeboard exceedance may be stored in another approved evaporation pond.~~

##### 4.1.3 Leakage of Pipeline from Leak Detection System to Evaporation Pond

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~
- 3 The pipeline will be repaired

- 4 If the pipeline cannot be repaired or repaired within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 5 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.1.4 Average Leakage Rate at Initial Action Level

The initial action levels for each pond are listed below

Evaporation Pond	Initial Action Level for Average Leakage Rate (in gallons)
1995 Evaporation Pond	155
1997 Evaporation Pond	160
2000 Evaporation Pond	355
Northwest Corner Evaporation Pond	300
Mixed Waste Evaporation Pond	160

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or ~~designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or ~~designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
3. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or ~~designee~~ will notify the ~~Director of~~ Engineering or ~~designee~~ Manager, Engineering and Maintenance
4. Within five days the Manager, Engineering and Maintenance ~~Engineering Department~~ will perform a pump down test to determine the accuracy of the flow meter
  - a The pump down test will entail the collection of water into a container with a known capacity as it is discharged from the Leak Detection System pump pipeline
  - b The water in the container will be measured and compared with the Leak Detection System meter to determine the system accuracy
  - c A report will be prepared by the ~~Director of~~ Engineering or ~~designee~~ and submitted to the DRC presenting the accuracy of the pump system

#### 4.1.5 Average Leakage Rate Exceedance

The allowable average leakage rate for each pond is listed below

Evaporation Pond	Allowable Average Leakage Rate (in gallons)
1995 Evaporation Pond	162
1997 Evaporation Pond	171
2000 Evaporation Pond	382

Northwest Corner Evaporation Pond	326
Mixed Waste Evaporation Pond	171

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~
3. The QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
4. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification and a proposed corrective action plan and schedule to the DRC within seven calendar days of discovery.
- ~~5. EnergySolutions shall secure a corrective action schedule from the Executive Secretary to execute the appropriate contingency actions.~~
- 6.5 A calculation from the monitored leakage rate will be evaluated by the engineering department Manager, Engineering and Maintenance ~~to determine the probable size and location of the leak(s)~~ This calculation will assess if the defect can be identified by performing a visual inspection
  - a. If the defect can be identified by visual inspection, the water level will be reduced to a level designated by the Director of Engineering Manager, Engineering and Maintenance to bring the average leakage volume below the allowable rate. Water may be placed in an approved evaporation pond.
  - b. If the leak(s) are determined too small for visual inspection, a leak location survey will be performed. EnergySolutions will include a Leak Survey Report with the HDPE Liner Repair Report detailing how the survey was conducted and provide the survey results, including the number and location of all leaks.
- ~~7.6 Defects in the liner will be repaired in accordance with the corrective action plan and schedule.~~
- ~~8.7 EnergySolutions shall submit for DRC approval an HDPE Liner Repair Report certified by a Utah Licensed Professional Engineer certifying all liner repair and testing procedures and quality assurance activities and documentation were performed in accordance with the corrective action plan and schedule. The report shall also include an estimate of the total volume of liquids released from the pond to the subsurface.~~

4.1.6 Fluid Head Level Exceedance (1 Foot Level Above the Lowest Point in the Lower Flexible Membrane Liner)

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~

- 3 The QAM or the ~~Director of Manager, Compliance and Permitting~~ or designee will provide verbal notification to the DRC within 24 hours of identification
- 4 The pump and process controller will be checked for proper activation within 24 hours and adjusted or replaced if necessary
- 4.5 The ~~Director of Manager, Compliance and Permitting~~ or designee will provide written notification to the DRC within seven calendar days of discovery
- 5- The pump and process controller will be checked for proper activation and adjusted or replaced within 24 hours if necessary

#### 4.2 1995/1997 Evaporation Pond Lift Station:

##### 4.2.1 Water Level Above the Lowest Level of the Inlet Pipe (Visual Alarm Activated)

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director~~ or designee immediately
- 2 The IUF, Rail Wash Facility on Track No 2, Containerized Waste Storage Pad, Rail Digging Facility, and Rail Rollover Facility will be placed out of service
3. The sump will be inspected to see if functioning properly
- 4 If the sump pump requires repair or replacement it will occur within the same working day
5. An inspection of the drainage system will occur to determine if blockage is present
- 6 If blockage is present it will be removed to restore free drainage
- 7 When free drainage is restored, the facilities may be placed back in service
- 8 If blockage cannot be removed or is not removed within the same working day, the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will provide notification to the ~~Director of Manager, Compliance and Permitting~~ and the QAM or designee
9. The QAM or ~~Director of Manager, Compliance and Permitting~~ or designee will provide verbal notification to the DRC within 24 hours of identification
- 10 The ~~Director of Manager, Compliance and Permitting~~ or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4.3 2000 Evaporation Pond Water Transfer Pad

##### 4.3.1 Lack of Free Drainage

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director~~ or designee immediately.
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and ~~Director of Manager, Compliance and Permitting~~ or designees.
- 3 Water management activities at the transfer pad will cease
4. An inspection of the drainage system will occur to determine if blockage is present

- 5 If blockage is present it will be removed to restore free drainage
- 6 When free drainage is restored, water management activities may resume
- 7 If free drainage is not restored within the same working day, the Manager, Waste Disposal Operations ~~Applicable Site Director~~ will notify the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designees.
8. The ~~Director of~~ Manager, Compliance and Permitting or QAM or designee will provide verbal notification to the DRC within 24 hours of identification
9. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4.3.2 Water Level in Sump Above Grate

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
- 3 Water management activities at the 2000 Evaporation Pond will cease
- 4 Water will be removed from the sump
- 5 When water is removed from the sump, water management activities may resume
6. If water is not removed within the same working day, the Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee
- 7 The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting
- 8 The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
- 9 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4.3.3 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting or designees.
- 3 The Facility Operator or BAT Inspector will cease water management activities at the transfer pad
- 4 The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
- 5 Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director~~ will provide the ~~Director of~~ Manager, Compliance

and Permitting or designee will submit just cause for submittal in writing to the Executive Secretary/Director.

- 6 Upon completion of repairs, water management activities may resume.
- 7 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary/Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8 The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.4 Northwest Corner Evaporation Pond Transfer Facility:

##### 4.4.1 Tear, gap, or hole found between concrete apron and HDPE liner

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations/Applicable Site Director or designee immediately
- 2 The Manager, Waste Disposal Operations/Applicable Site Director or designee will notify the QAM and the Director of Manager, Compliance and Permitting or designees
- 3 The Facility Operator or BAT Inspector will cease water management activities at the transfer facility
- 4 The Manager, Waste Disposal Operations/Applicable Site Director will schedule repairs to the exposed pad within 7 days after receiving notification
- 5 Repairs will be completed within 30 working days of discovery or the Applicable Site Director will provide the Director of Manager, Compliance and Permitting or designee will submit just cause for submittal in writing to the Executive Secretary/Director
- 6 Upon completion of repairs, water management activities may resume
- 7 If repairs are not performed within 30 working days of discovery and just cause has not been provided to the Executive Secretary/Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
8. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

##### 4.4.2 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations/Applicable Site Director or designee immediately
- 2 The Manager, Waste Disposal Operations/Applicable Site Director or designee will notify the QAM and the Director of Manager, Compliance and Permitting or designees

- 3 The Facility Operator or BAT Inspector will cease water management activities at the transfer facility
- 4 The ~~Manager, Waste Disposal Operations~~ Applicable Site Director will schedule repairs to the pad within 7 days after receiving notification
5. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director~~ will provide the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will submit just cause for ~~submittal~~ in writing to the ~~Executive Secretary~~ Director
- 6 Upon completion of repairs, water management activities may resume
7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

#### 4.5 LARW, Class A, and Class A North Cell Collection Lysimeters:

##### 4.5.1 Free Liquid is Greater Than 12 Inches Below the Intersection of the Transfer Pipe

- 1 Free liquid present will be purged for sampling
- 2 Analytical Parameters to be tested will be prioritized by the ~~CRSO, Director of~~ Manager, Compliance and Permitting, and the ~~Staff Hydrogeologist~~ Parameters chosen are dependent on the volume of liquid in the lysimeter taking into account the priority list provided in Appendix C of the GWQDP.
- 3 Analytical results will be reviewed and submitted to the DRC within 14 calendar days of receipt

##### 4.5.2 Free Liquid Less Than 12 Inches Below the Intersection of the Transfer Pipe

- ~~1~~ The ~~Site Hydrogeologist~~ or ~~designee~~ will notify the ~~Director of Compliance and Permitting, Applicable Site Director~~ or ~~designee~~, and QAM
- ~~2~~1 The QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- ~~3~~2 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery
- ~~4~~3 Free liquid will be purged for sampling
- ~~5~~4 Analytical Parameters to be tested will be prioritized by the ~~CRSO, Director of~~ Manager, Compliance and Permitting, and the ~~Staff Hydrogeologist~~ Parameters chosen are dependent on the volume of liquid in the lysimeter taking into account the priority list provided in Appendix C of the GWQDP
- ~~6~~5 Analytical results will be reviewed and submitted to the DRC within 14 calendar days of receipt

#### 4.6 Rail Rollover Facility:

##### 4.6.1 Lack of Free Drainage from the Berm, Through the Trough, to the Settling Basin, and Continuing to the Sump

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
- 3 Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License)
- 4 An inspection of the drainage system (berm, trough, settling basin to sump) will occur to determine if blockage is present
5. If blockage is present it will be removed to restore free drainage
- 6 When free drainage is restored, waste management activities may resume at the facility
- 7 If free drainage is not restored within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

##### 4.6.2 Water Level in Sump Above Grate

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
- 3 Waste management activities will cease (waste may be removed from the facility).
- 4 The sump pump will be inspected to see if functioning properly
- 5 If the sump pump requires repair, replacement, or blockage removal it will occur within the same working day
- 6 When sump pump has been repaired, etc , waste management activities may resume at the facility
- 7 If the sump pump is not repaired, replaced, or blockage removed within the same working day, the ~~Facility Operator or BAT Inspector~~ will notify the ~~Applicable Site Director or designee~~ ~~The~~ QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
- 8 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.6.3 Ponded Water Within the Covered Area of the Facility

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. Waste Management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License)
4. Removal of water shall occur in accordance with priorities as listed in Part I E 7 (c) of the Permit

#### 4.7 Containerized Waste Storage Pad:

##### 4.7.1 Water Above the Sump Grate

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License)
4. An inspection of the drainage system will occur to determine if blockage is present
5. If blockage is present it will be removed to restore free drainage
6. When free drainage is restored, waste management activities may resume at the facility
7. If free drainage is not restored within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designees will provide verbal notification to the DRC within 24 hours of identification
8. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

##### 4.7.2 Discrepancy in Exposed Storage Pad Integrity

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the major discrepancy

- 4 The Facility Operator or BAT Inspector will mark the area with a sign or painted markings
5. No storage will occur in the marked area until repairs are complete
6. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
- 7 Repairs will be completed within 10 working days of discovery or the ~~Director of~~ Manager, Compliance and Permitting will provide just cause in writing to the ~~Executive Secretary~~ Director.
- 8 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 9 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4 7 3 Improper Labeling or Storage of Waste

- 1 The Facility Operator or BAT Inspector will rectify and document within the same working day

#### 4.8 East Truck Unloading Area:

##### 4 8 1 Troughs More Than Three Quarters Full

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
3. Waste Management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Permittee's Radioactive Material License)
- 4 If blockage is present it will be removed to restore drainage
- 5 When free drainage is restored, waste management activities may resume at the facility
- 6 If free drainage is not restored within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 7 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide notification to the DRC within seven calendar days of discovery

##### 4 8 2 Discrepancy in Exposed Surface Integrity

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
2. ~~The~~ Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the discrepancy
4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings
5. No waste management will occur in the marked area until repairs are complete
6. ~~The~~ Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed surface within 48 hours after receiving notification
7. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee~~
8. ~~7~~ The Director of ~~Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the Executive Secretary ~~Director~~
9. ~~8~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary ~~Director~~, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that repairs were not performed
10. ~~9~~ The Director of ~~Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4 8 3 Containers Without Current Date on Bates Label on Asphalt Surfaces

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~
2. ~~The~~ Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Permittee's Radioactive Material License)
4. The container(s) will be removed from the asphalt surface
5. When the container(s) have been removed, waste management activities may resume at the facility
6. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
7. ~~The~~ Director of ~~Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4 8.4 Improper Labeling or Storage of Waste on Concrete Holding Pads

- 1 The Facility Operator or BAT Inspector will rectify and document within the same working day

#### 4.9 Intermodal Unloading Facility:

##### 4 9.1 Water Above the Sump Grate

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~
- 3 Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Permittee's Radioactive Material License)
- 4 An inspection of the drainage system will occur to determine if blockage is present
- 5 If blockage is present it will be removed to restore free drainage
- 6 When free drainage is restored, waste management activities may resume at the facility
- 7 If free drainage is not restored within the same working day, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 8 The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

##### 4 9.2 Discrepancy in Exposed Pad Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designee~~
- 3 The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the major discrepancy
- 4 The Facility Operator or BAT Inspector will mark the area with a sign or painted markings
- 5 No storage will occur in the marked area until repairs are complete
- 6 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
- 7 ~~Repairs will be completed within 10 working days of discovery or the~~ Applicable Site Director or designee ~~designee will provide just cause in writing to the Director of Compliance and Permitting~~

~~8-7~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director

~~9-8~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed

~~10-9~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.9.3 Improper Labeling or Storage of Waste

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

#### 4.10 Intermodal Unloading Facility Lift Station

##### 4.10.1 Water Level Above the Lowest Level of the Inlet Pipe (Visual Alarm Activated)

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~
3. The IUF, Rail Wash Facility on Track No 2, Rail Digging Facility and Rail Rollover Facility will be placed out of service
4. The sump will be inspected to see if functioning properly
5. If the sump pump requires repair or replacement it will occur within the same working day.
6. An inspection of the drainage system will occur to determine if blockage is present
7. If blockage is present it will be removed to restore free drainage
8. When free drainage is restored, the facilities may be placed back in service
9. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
10. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.11 LARW Box Washing Facility:

##### 4.11.1 Lack of Free Drainage to the Sump Continuing to the Concrete Holding Tanks

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The facility will be placed out of service
- 4 The drainage system will be inspected for blockage
- 5 The sump pump will be inspected to see if functioning properly
- 6 If the sump pump requires repair or replacement it will occur within the same working day
- 7 If blockage is present within the drainage system, it will be removed within the same working day
- 8 When drainage is restored via blockage removal or sump pump repair, the facility may be placed back in service
- 9 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 10 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4 11 2 Pipeline Cap from the Building Not Intact

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The facility will be placed out of service
- 4 Water will be removed from the sump
- 5 Evaluate whether there has been a discharge from the facility. If so, implement the Emergency Response Plan
- 6 The cap will be replaced
- 7 When cap is replaced, the facility may be placed back in service
- 8 If cap cannot be replaced within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 9 The ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4 11.3 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately

- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. The ~~Applicable Site Director or designee~~ will schedule repairs within 48 hours after receiving notification
- 4—Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting~~
- 5-4 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director
- 6-5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
- 7-6 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.11 4 Water Level in the Holding Tanks Greater Than Three Quarters (3/4) Full

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
- 3 The facility will be placed out of service
4. The water will be removed
5. Upon completion of water removal, the facility may be placed back in service
- 6 If water cannot be removed, or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
- 7 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

**4.12 Rail Wash Facility on Track No. 4:****4 12 1 Lack of Free Drainage to the Wash Bay Sump Pump Continuing to the Collection Tank(s) Within the Adjacent Equipment/Mechanics Building**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
- 3 The facility will be placed out of service.
- 4 The sump pump will be inspected to see if functioning properly
- 5 If the sump pump requires repair or replacement it will occur within the same working day
- 6 An inspection of the drainage system, including the concrete trench in the rail wash building will occur to determine if blockage is present.
7. If blockage is present it will be removed to restore free drainage
8. When free drainage is restored, the facility may be placed back in service
- 9 If blockage cannot be removed or is not removed within same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 10 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

**4 12 2 Failure of Gray Water Transfer System from the Collection Tank(s) to the 1997 Pond**

- 1 The Facility Operator or BAT inspector will ~~N~~notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Compliance and Permitting ~~or designees~~
- 3 Place the facility out of service
- 4 Inspect the gray water transfer system (pump and piping) to see if it is operating correctly
- 5 Perform repairs or replacement of the pump if necessary within the same working day
- 6 Inspect the piping system, including Manholes 1 and 2 if needed to identify damage or leakage
- 7 If the gray water transfer system cannot be repaired within same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 8 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

**4 12 3 Discrepancy in Exposed Pad Integrity**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
- 4—Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting~~ or ~~designee~~
- 5-4 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director
- 6-5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 7-6 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

#### 4.13 Rail Digging Facility:

##### 4 13 1 Lack of Free Drainage of Water to the Collection Basins to the Sediment Basin

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The facility will be placed out of service
- 4 An inspection of the drainage system will occur to determine if blockage is present
- 5 If blockage is present it will be removed to restore free drainage
- 6 When free drainage is restored, the facility may be placed back in service
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 8 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery

##### 4 13 2 Water Level in the Collection Basins Above the Elevation of the Outlet Pipe Grate

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. The facility will be placed out of service.
4. The outlet pipe will be inspected for blockage
5. If blockage is present it will be removed to restore free flowing condition
6. When free drainage is restored, the facility may be placed back in service
7. If blockage cannot be removed, or is not removed within the same working day, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
8. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

#### 4.13 3 Water Level in the Sediment Basin Above the Elevation of the Outlet Pipe

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designee.
3. The facility will be placed out of service
4. The outlet pipe will be inspected for blockage
5. If blockage is present it will be removed to restore free flowing condition
6. When free drainage is restored, the facility may be placed back in service
7. If blockage cannot be removed, or is not removed within the same working day, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
8. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4 13 4 Leakage of Stormwater Detected at the Digging Facility Manhole.

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees
3. The facility will be placed out of service
4. When repairs are completed, the facility may be placed back in service
5. If repairs cannot be made within the same working day, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification

- 6 The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.13.5 Discrepancy in Exposed Asphalt Pad and Concrete Integrity.

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~
3. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting or designee~~
5. ~~4. The Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the ~~Executive Secretary~~Director
6. ~~5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~Director, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
7. ~~6. The Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.14 Decontamination Access Control Building:

##### 4.14.1 Lack of Free Drainage to the Wastewater Collection Tank

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~
3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service
4. An inspection will occur to determine if blockage is present
5. If blockage is present it will be removed to restore free drainage
6. When free drainage is restored, the bootwash, respirator sink, and sink next to shower may be placed back in service
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification

- 8 The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.14.2 Visual Alarms Located Inside the Building at the Bootwash and Respirator Sink Activated

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Facility Manager to schedule the manual removal of water from the collection tank.~~
2. If water is not removed from the collection tank within the same working day, the bootwash, respirator sink, shower, and sink next to shower will be placed out of service
3. Upon completion of water removal, the out of service designation will be removed from the bootwash, respirator sink, shower, and sink next to shower

#### 4.14.3 Water Level in the Wastewater Collection Tank Not Below the Bottom Elevation of the Inlet Pipe

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting or designees
- 3 The bootwash, respirator sink, shower, and sink next to shower will be placed out of service
4. Water will be removed from the tank
- 5 Upon completion of water removal, the out of service designation will be removed from the bootwash, respirator sink, shower, and sink next to shower
6. If water is not removed, within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
- 7 The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.14.4 Presence of Fluids in Leak Detection System

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately.~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting or designees
- 3 The bootwash, respirator sink, shower, and sink next to shower will be placed out of service
- 4 The QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification

- 5 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery
- 6 Fluid will be collected from the leak detection system
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred
- 8 A written report including remediation plans if necessary will be submitted to the DRC

#### 4.15 Intermodal Container Wash Building:

##### 4 15 1 Water Level in the Sediment Basin Sump At or Above the Weir Grate

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The facility will be placed out of service.
- 4 Water will be removed from the sump
- 5 If water is not removed, within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
6. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery.

##### 4 15 2 Lack of Free Drainage from the Bootwash to the Troughs

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The facility will be placed out of service
- 4 An inspection of the drainage system will occur to determine if blockage is present
- 5 If blockage is present it will be removed to restore free drainage
- 6 When free drainage is restored, the facility may be placed back in service
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 8 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery

##### 4 15 3 Lack of Free Drainage Through the Troughs to the Sediment Basin

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
- 3 The facility will be placed out of service
4. An inspection of the drainage system will occur to determine if blockage is present
- 5 If blockage is present it will be removed to restore free drainage.
- 6 When free drainage is restored, the facility may be placed back in service
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

## 4 15 4 Presence of Fluids in Leak Detection System

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~
- 3 The facility will be taken out of service
- 4 The QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 5 The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery
6. Fluid will be collected from the leak detection system.
- 7 Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred
- 8 A written report including remediation plans if necessary will be submitted to the DRC

## 4 15.5 Discrepancy in Exposed Concrete Integrity

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~
- 3 The affected bay(s) will be placed out of service
- 4 The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
- 5—Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting ~~or designee~~
- 6-5 The Director of Manager, Compliance and Permitting ~~or designee~~ will provide just cause in writing to the Executive Secretary~~Director~~
- 7-6 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~Director~~, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8-7 The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.16 Shredder Facility:

##### 4 16 1 Lack of Free Drainage from Concrete Surface to Catchbasins

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
3. Place the facility out of service
4. Perform an inspection of the drainage system to determine if blockage is present. Water will be removed from the sump
5. If blockage is present, remove blockage
6. Place facility back in service when free drainage is restored
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

##### 4 16 2 Presence of Leakage from Manhole 1 Pipeline to Water Storage Tanks

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
3. Place the facility out of service
4. Inspect the pipeline to determine source of leak
5. Repair the pipeline
6. If repairs cannot be completed within the same work day that the leak was discovered, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
7. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

##### 4 16 3 High Water Level Alarms Activated at the Water Storage Tank(s)

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
3. Place the facility out of service

4. The Manager, Waste Disposal Operations will ~~Facility Operator or BAT Inspector~~ will notify the ~~Facility Manager or designee~~ to schedule the manual removal of water from the storage tank
5. If the water is not removed below the high water level within the same working day that the alarm was activated, the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
6. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
7. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.
8. Upon completion of water removal below the high water level, the facility may be placed back in service

#### 4.16 4 Valve to Alternate Wastewater Management System in Closed Position when Managing PCB Waste

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service
4. Valve to the Rotary Dump Facility will be checked to ensure that it is in the closed position. If this valve is in the "open" position, the actions of 4 16 5, below, will be implemented
5. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~, together with the ~~Director of~~ Manager, Compliance and Permitting, will assess the situation and open the valve to the alternate wastewater management system prior to placing the system back in service

#### 4 16 5 Valve to Rotary Dump Facility in Open Position when Managing PCB Waste

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service
4. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will determine necessary sampling activities.

#### 4.16 6 Facility Not Labeled for PCBs as Required

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately

2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. The facility will be placed out of service
4. The Facility Operator or BAT Inspector will ensure proper labeling of facility
5. The facility will be placed back in service

#### 4 16 7 Water Storage Tank Not Labeled as PCBs as Required.

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. The facility will be placed out of service
4. The Facility Operator or BAT Inspector will ensure the tank is properly labeled
5. The facility will be placed back in service

#### 4 16 8 Discrepancy in Exposed Concrete Integrity.

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will schedule repairs to the exposed pad within 48 hours after receiving notification
3. Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the ~~Director of Compliance and Permitting or designee~~
- 4.3 The ~~Director~~ Manager, of Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director
- 5.4 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 6.5 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4 16.9 Shredded Material Remaining on the Outfeed Pad at End of Shift

1. The Facility Operator will cease operation of the Shredder Facility
2. The Facility Operator will notify the Manager, Waste Disposal Operations Applicable Site Director or designee QAM immediately

3. The ~~Manager, Waste Disposal Operations Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~.
4. The Facility Operator will ensure that the material is no longer susceptible to wind dispersal as follows:
  - a. Containerize shredded material, or
  - b. Cover with a nominal 6" inches of soil or soil-like waste material, or
  - c. Cover with a commercial fixative to prevent wind dispersal and leachate generation, applied in accordance with the manufacturer's instructions
5. The QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that shredded material was not removed by the end of shift
6. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that material was not removed from the outfeed pad by the end of the shift
7. The Shredder Facility may not continue operation until the shredded material is removed

#### 4.17 Rotary Dump Facility

##### 4.17.1 Thaw Building

##### 4.17.1.1 Discrepancy in Exposed Concrete Integrity

1. The Facility Operator or BAT Inspector will notify the ~~Manager, Waste Disposal Operations Applicable Site Director or designee~~ immediately
2. The ~~Manager, Waste Disposal Operations Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~
3. The ~~Manager, Waste Disposal Operations Applicable Site Director~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
4. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee~~
5. ~~The Director of Manager, Compliance and Permitting will provide just cause in writing to the Executive Secretary Director~~
6. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed~~
7. ~~The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed~~

#### 4 17.1.2 Ponding of Water on the Granular Floor Surface of the Thaw Building:

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting
- 3 Place the facility out of service
- 4 Perform an inspection of the drainage system to determine if blockage is present
- 5 If blockage is present, remove blockage
- 6 Place facility back in service when drainage is restored
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 8 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4 17 1 3 Blockage of Pipe from Thaw Building to Rotary Floor

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
- 3 Place the facility out of service.
- 4 Remove blockage
- 5 Place the facility back in service when drainage is restored
- 6 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 7 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4 17 2 Wash Building

##### 4 17 2 1 Discrepancy in Exposed Concrete Integrity of the curbing at the east end of the wash building

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee immediately~~

2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees
3. An absorbent material will be placed along the curbing to deter water flow past the curb
4. The Manager, Waste Disposal Operations Applicable Site Director or designee will schedule repairs to the exposed pad within 48 hours after receiving notification
5. Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting
6. The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary Director
7. 6 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
8. 7 The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.17.2.2 Discrepancy in Exposed Concrete Integrity

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. The Manager, Waste Disposal Operations Applicable Site Director or designee will schedule repairs to the exposed pad within 48 hours after receiving notification
4. Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting
5. 4 The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary Director
6. 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
7. 6 The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

4 17 2 3 Integrity Breach at Surface Seal Around Footing

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Facility Operator or BAT Inspector will place the Wash Building out of service
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
4. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the surface seals within 48 hours after receiving notification
5. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting~~
6. ~~5~~ The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director
7. ~~6~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
8. ~~7~~ The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4 17 2 4 Water Level Above Grates Within the Wash Building

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The facility will be placed out of service
4. Perform an inspection of the drainage system to determine if blockage is present
5. If blockage is present, remove blockage
6. Place facility back in service when drainage is restored
7. If blockage cannot be removed or is not removed within the same working day, the QAM or ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
8. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

4 17 2.5 Lack of Free Drainage from the Floor to the Trench

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The facility will be placed out of service
- 4 Perform an inspection to determine if blockage is present.
5. If blockage is present, remove blockage
- 6 Place facility back in service when drainage is restored.
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
- 8 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4 17 3 Rotary Building

##### 4.17 3 1 Discrepancy in Exposed Concrete Integrity.

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
- 3 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
- 4—Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting~~ or designee
- 5-4 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director
- 6-5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 7-6 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

##### 4 17 3 2 Lack of Free Drainage from Rotary Dump Floor to Sediment Basin (When waste management activities are not occurring)

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. ~~The Manager, Waste Disposal Operations Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage
6. Place facility back in service when free drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
8. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4.17.3 3 Water Level Above the Grate in the Sediment Basin

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. ~~The Manager, Waste Disposal Operations Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. Waste management activities at the facility will cease (waste may be removed from the facility)
4. The submersible pump will be inspected to see if functioning properly
5. If the submersible pump requires repair or replacement, it will occur within the same working day
6. The pipeline from the submersible pump to the northwest corner evaporation pond will be inspected for blockage
7. If blockage is present within the pipeline it will be removed
8. When blockage of pipeline is removed and/or pump repair or replacement has been completed, the facility may be placed back in service
9. If blockage cannot be removed and/or pump repair/replacement cannot be completed, or is not completed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
10. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4 17 3 4 Presence of Fluids in Sediment Basin Leak Detection System

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately

2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
3. The facility will be taken out of service
4. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
5. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery
6. Fluid will be collected from the leak detection system
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred
8. A written report including remediation plans if necessary will be submitted to the DRC.

4 17.3 5 Presence of Fluids in Leak Detection System for the Pipeline from Rotary Building to the Northwest Corner Evaporation Pond

1. The Facility Operator or BAT Inspector will return the observation valve to the closed position.
2. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
4. The facility will be taken out of service
5. The Facility Operator or BAT Inspector will close and lock the valve between the sediment basin and the Northwest Corner Evaporation Pond
6. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will notify ~~provide notification to the Director of~~ Manager, Compliance and Permitting ~~or designee,~~ of the desire to operate the facility using the Alternate Wastewater Management Area
7. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC.
8. Upon completion of DRC notification to use the Alternate Wastewater Management System, the Rotary Dump Facility may be placed in service.
9. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that fluids were present within the leak detection system
10. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.
11. Fluid will be collected from the leak detection system
12. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred
13. A written report including remediation plans if necessary will be submitted to the DRC

#### 4 17 4 Alternate Wastewater Management Area (When Placed in Service and Locking Valve is in the "Open" Position)

##### 4 17 4 1 Presence of Leakage from Sediment Basin Pipeline to Water Storage Tanks

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director of Designee immediately.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees
3. Place the facility out of service
4. Inspect the pipeline to determine origin of leak
5. Repair the pipeline
6. Place facility back in service when repairs are complete
7. If repairs cannot be repaired within the same work day, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
8. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

##### 4 17 4 2 Visual Alarm at One or Both Storage Tanks

1. The Rotary Dump Facility will be placed out of service
2. The Facility Operator or BAT Inspector will notify the Facility Manager to schedule the Perform manual removal of water from the collection tank
3. If the water is not removed within the same working day, the Facility Manager Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee
4. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees
5. The QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
6. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery
7. Upon completion of water removal, the facility may be placed back in service

##### 4 17 4 3 Ponding of Water on the Concrete Surface at the Alternate Wastewater Management Area

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees
3. Place the facility out of service

- 4 Inspect the drainage system to determine if blockage is present
5. If blockage is present, remove blockage
6. Place facility back in service when drainage is restored
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification.
- 8 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4 17.4 4 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification
- 4—Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of~~ Compliance and Permitting or ~~designee~~
- 5-4 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director
- 6-5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 7-6 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.18 East Side Drainage System:

##### 4 18 1 Stormwater Management System

##### 4 18 1 1 Catchbasin Water Level Above Outlet Pipe

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~
- 3 Inspect the drainage system to determine why it is not free-draining

- 4 Complete repairs as needed to restore free drainage within the same working day
5. If free drainage is not restored within the same work day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
- 6 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4 18 1 2 Lift Sump Alarm Activated

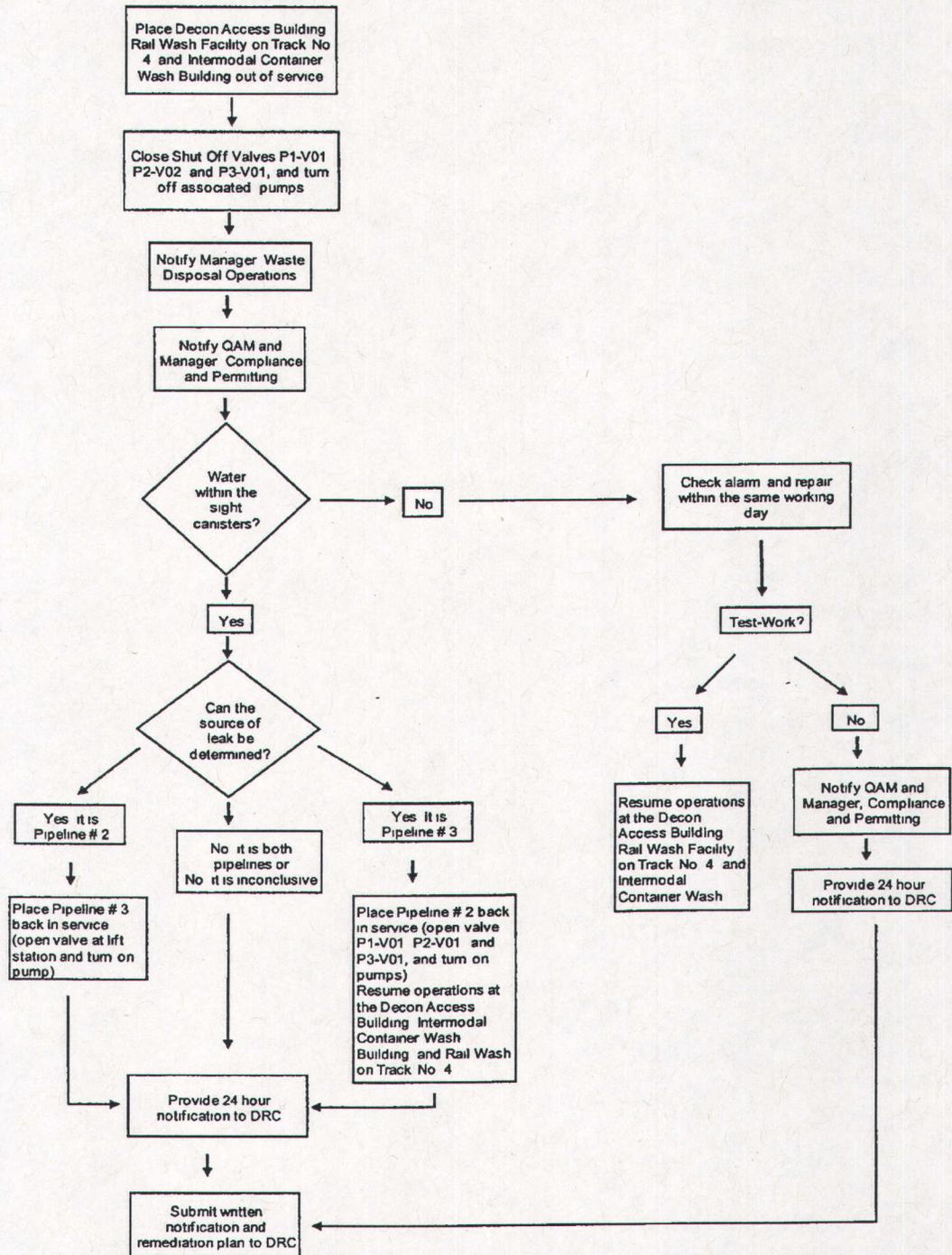
- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. Inspect the alarm system to determine if functioning properly
- 4 Inspect the sump pump(s) to determine if functioning properly
- 5 If the sump pump(s) requires repair or replacement it will occur within the same working day
- 6 If sump pump(s) cannot be repaired or replaced on the same working day of discovery, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification
- 7 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4 18 2 East Side Drainage System Gray Water

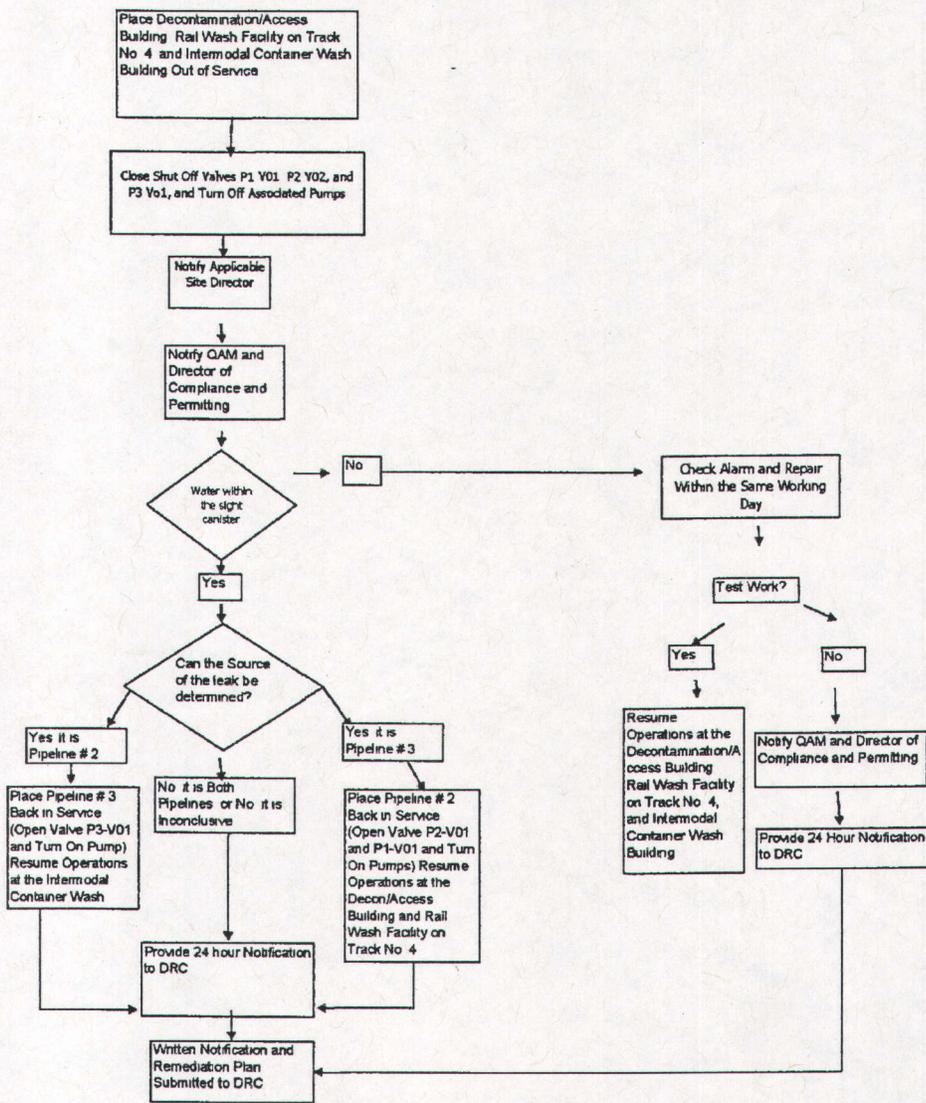
4.18 2 1 Visual Alarm Activated at Manhole 1 (See Figure 1 of inspection form)

1 Perform Contingency Actions in accordance with the following Flow Chart

**Alarm Activated at Manhole 1**



**Alarm Activated at Manhole 1**

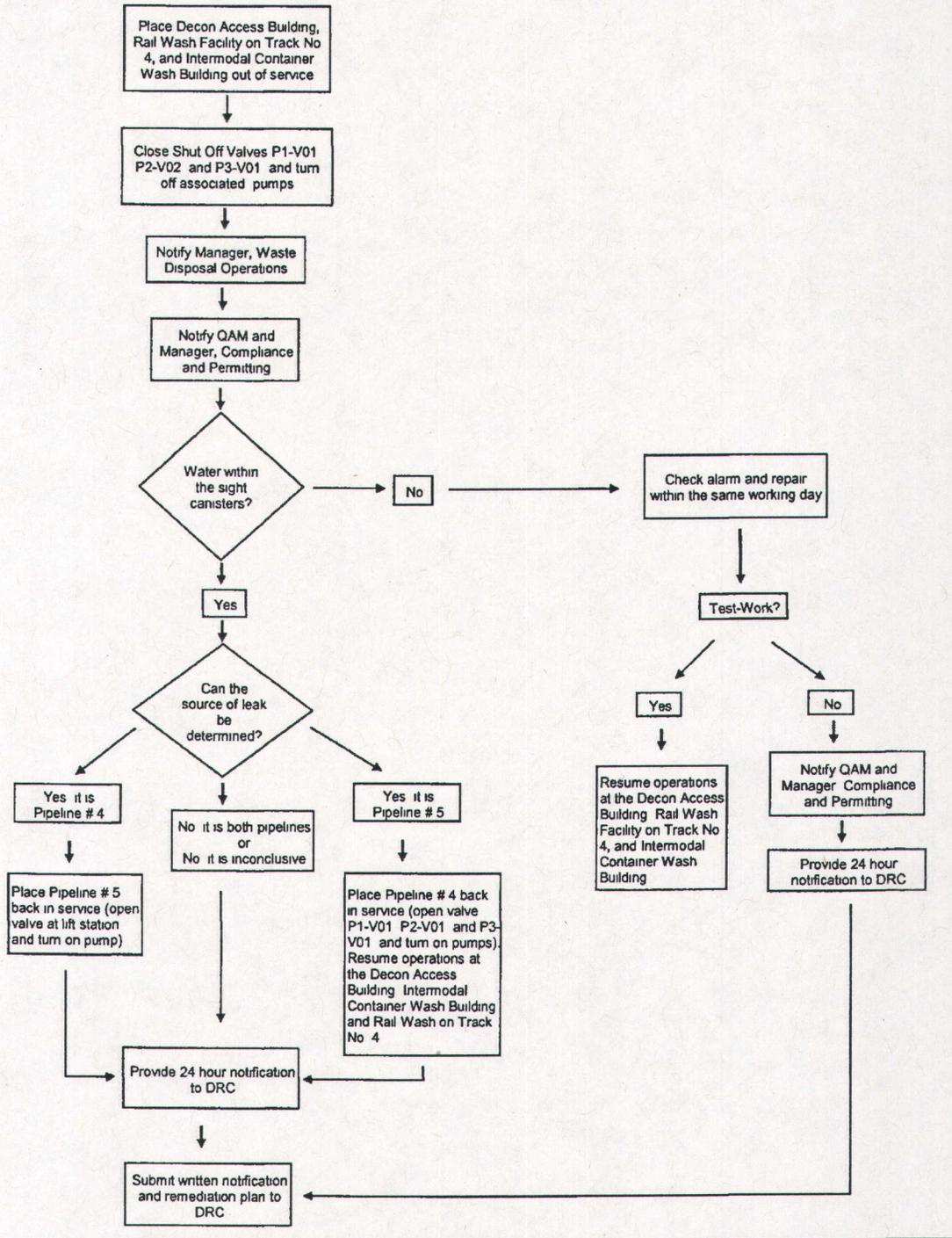


Revised January 21 2008

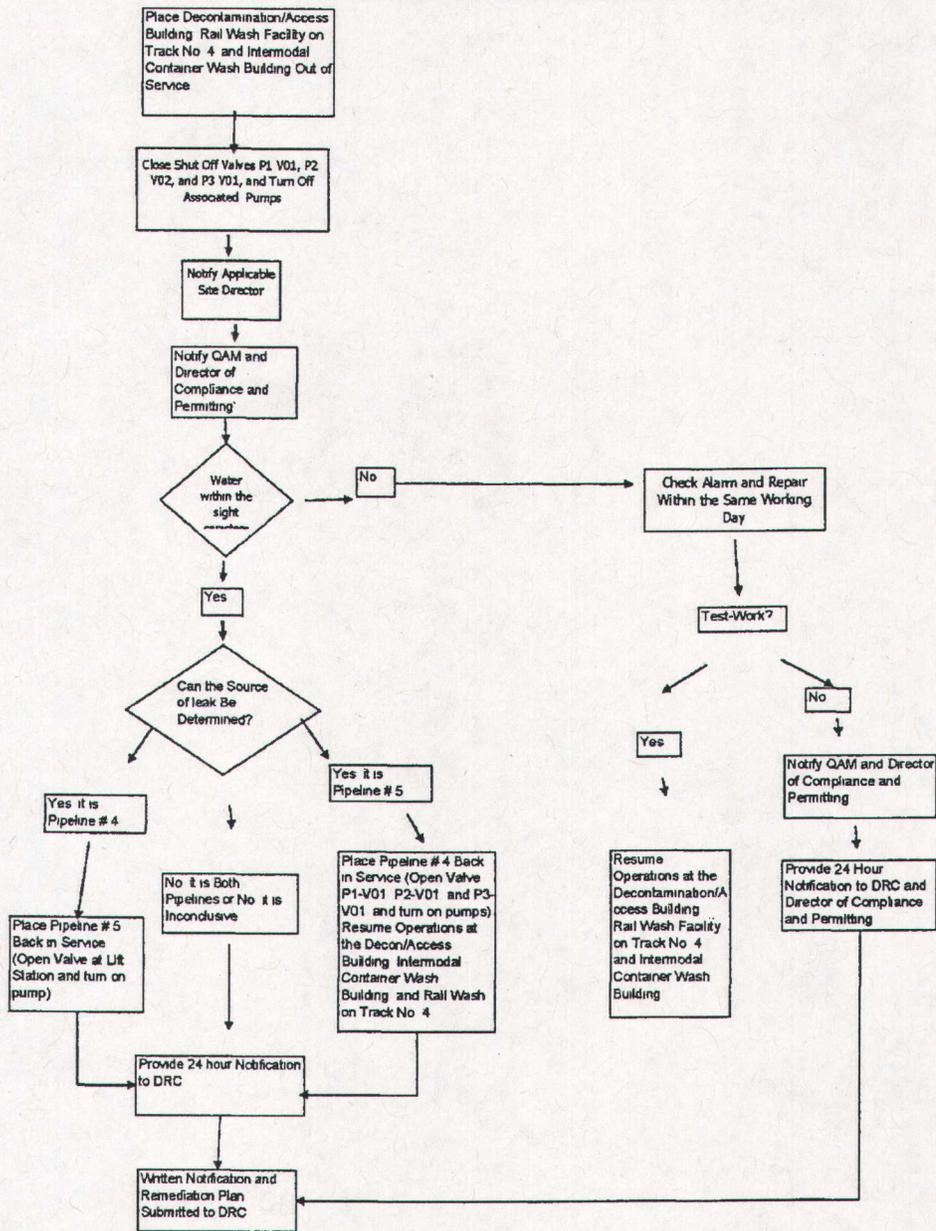
4 18 2.2 Visual Alarm Activated at Manhole 2 (See Figure 1 of inspection form)

1 Perform Contingency Actions in accordance with following Flow Chart

**Alarm Activated at Manhole 2**



**Alarm Activated at Manhole 2**



Revised January 21 2008

## 4.18.2.3 Failure of the carrier pipe

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Upon discovery the Applicable Site Director or designee will be notified immediately~~
2. The affected shut-off valves will be closed, and associated pumps to affected facilities will be placed out of service
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting and ~~Director of~~ Manager, Engineering and Maintenance, or designee
4. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of confirmation and provide notification of manual water removal from affected facilities
5. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery
6. The ~~Director of~~ Manager, Engineering and Maintenance will schedule testing of the containment pipe(s)
7. The containment pipe(s) will be tested based on the ASTM-F1417 method
8. Upon completion of containment pipe testing, findings will be documented and a report submitted to the DRC within 30 calendar days. The report will include any completed or scheduled remediation
9. Once remediation efforts have been completed, verification of the containment pipe repairs and remediation will be performed under the direction of and certified by a certified ~~Independent Professional Engineer~~.
10. The facility will be placed back into service

## 4.19 South Ditch

## 4.19.1 Pump system not functioning as designed green light not activated when pump is present and operating

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM, ~~Director of~~ Manager, Engineering and Maintenance, and ~~Director of~~ Manager, Compliance and Permitting or designees
3. The ~~Director of~~ Manager, Engineering and Maintenance or designee will schedule repairs within 48 hours after receiving notification
4. Repairs will be completed within 14 calendar days of discovery or the ~~Director of~~ Engineering or designee will provide just cause to the ~~Director of~~ Compliance and Permitting or designee
5. ~~4~~ The ~~Director of~~ Manager, Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director
5. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or

the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed

- 6 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

4.19.2 Pump system not functioning as designed (pump is present but not operating with or without activation of green light)

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM, Director of Manager, Engineering and Maintenance, and Director of Manager, Compliance and Permitting or designees
- 3 Manual removal of water will begin within the same working day
4. The Director of Manager, Engineering and Maintenance or designee will schedule repairs of the pump system within 48 hours after receiving notification.
- 5 ~~Repairs will be completed within 14 calendar days of discovery or the Director of Engineering or designee will provide just cause to the Director of Compliance and Permitting or designee~~
- 6 ~~5~~ The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary ~~Director.~~
- 6 If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Executive Secretary ~~Director~~, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

4.19.3 Pump system not functioning as designed (blue light not activated when water is above the sump grate)

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM, Director of Manager, Engineering and Maintenance, and Director of Manager, Compliance and Permitting or designees
- 3 The Director of Manager, Engineering and Maintenance or designee will schedule repairs within 48 hours after receiving notification
- 4 ~~Repairs will be completed within 14 calendar days of discovery or the Director of Engineering or designee will provide just cause to the Director of Compliance and Permitting or designee~~

~~5-4~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director

~~6-5~~ If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed

~~7-6~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

4 19 4 Grate less than 75% clear of debris (determined during monthly pump and indicator light inspection)

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately

~~2~~ The Facility Operator or BAT Inspector will notify individuals to remove debris from the grate

~~3~~ Debris removal will be completed within 48 hours of discovery or the ~~Director of Engineering or designee~~ will provide just cause to the ~~Director of Compliance and Permitting or designee~~

~~4-2~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director

~~5-3~~ If debris removal is not performed within 48 hours of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the debris removal was not performed

~~6-4~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that the removal was not performed

4 19 5 Manual water removal (only required when pump is not operating or has been removed during freezing weather) not initiated the same day as identification

1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately

2 The Manager, Waste Disposal Operations ~~Facility Operator or BAT Inspector~~ will notify individuals to begin schedule manual water removal

3 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~

4 The ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification

5 The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery

#### 4.20 LLRW Operations Building

4 20 1 High water level alarm (orange strobe) activated at the wastewater collection tank:

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
- 2 The Manager, Waste Disposal Operations ~~Facility Operator or BAT Inspector~~ will ~~notify the Facility Manager or designee~~ to schedule the manual removal of water from the storage tank
3. If the water is not removed below the high water level by the end of the following workday after discovery, the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~
- 4 The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 5 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery

4 20.2 High-high-level alarm (red strobe) activated at the wastewater collection tank:

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
- 2 The Manager, Waste Disposal Operations ~~applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
- 3 Place the wastewater generating systems (restricted area of the building) out of service
- 4 The Manager, Waste Disposal Operations will ~~Facility Operator or BAT Inspector~~ will ~~notify the Facility Manager or designee~~ to schedule the manual removal of water from the wastewater collection tank
- 5 If the water is not removed below the high water level within the same working day of discovery, the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~
- 6 The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification
- 7 The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery
- 8 Upon completion of water removal below the high water level, the facility may be placed back in service.

4 20 3 Presence of fluids in the leak detection system

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately

- 2 The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM, ~~Director of Manager, Compliance and Permitting, and Director of Manager, Engineering and Maintenance~~ or designees
- 3 The wastewater generating systems (restricted area of the building) will be placed out of service
4. The ~~Director of Manager, Engineering and Maintenance~~, or designee, will determine the cause of the alarm and schedule repairs as needed
- 5 The QAM or the ~~Director of Manager, Compliance and Permitting~~ or designee will provide verbal notification to the DRC within 24 hours of identification
- 6 If repairs to the inner (primary) tank are required, the tank shall be re-certified by an independent PE before being placed back into service
- 7 If the sensor is determined to be faulty, the facility may be placed back into service once it is repaired or replaced and tested
- 8 The ~~Director of Manager, Compliance and Permitting~~ or designee will provide written notification to the DRC within seven calendar days of discovery

#### 4.21 SRS DU Storage Building

##### 4 21 1 Discrepancy in Exposed Asphalt Integrity

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting~~ or designees
3. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the exposed asphalt surface within 48 hours after receiving notification
- 4—Repairs will be completed within 10 working days of discovery or the Manager, Applicable Site Director or designee will provide just cause to the ~~Director of Compliance and Permitting~~ or designee
- 5-4 ~~The Director of Compliance and Permitting~~ will provide just cause in writing to the Executive Secretary ~~Director~~
- 6-5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary ~~Director~~, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 7-6 ~~The Director of Manager, Compliance and Permitting~~ or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

##### 4 21 2 Evidence of container leakage, corrosion, or deterioration

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately

2. The Manager, Waste Disposal Operations applicable ~~Site Director or designee~~ will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting, or ~~designees~~
3. An inspection will be performed to determine corrective actions as needed i e overpack of containers
4. Corrective actions shall be completed and documented within the same working day
5. If corrective actions cannot be completed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
6. If corrective actions cannot be completed with the same working day, the ~~Director of~~ Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4.21.3 Presence of water on the asphalt surface

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately~~
2. The Manager, Waste Disposal Operations will schedule Facility Operator or BAT Inspector ~~will notify individuals for water removal~~
3. The Manager, Waste Disposal Operations applicable ~~Site Director or designee~~ will notify the QAM, ~~Director of~~ Manager, Compliance and Permitting, and ~~Director of~~ Manager, Engineering and Maintenance or ~~designees~~
4. An inspection will be performed to determine the source of the water and schedule repairs as needed
5. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification
6. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery.

#### 4.22 Evaporation Pond Ancillary Equipment to Facilitate Evaporation

##### 4.22.1 Contact wastewater spill outside of the pond and secondary containment

1. The Facility Operator or BAT Inspector will implement the Emergency Response Plan Implementation automatically notifies the Manager, Waste Disposal Operations, QAM, and Manager, Compliance and Permitting
- ~~2. The Facility Operator or BAT Inspector will notify the Applicable Site Director or designee immediately~~
- ~~3. The Applicable Site Director or designee will notify the QAM and Director of Compliance and Permitting or designees~~
- ~~4.2~~ The spill will be cleaned up in accordance with the Emergency Response Plan Initial (24-hour) and followup (7-day) reports will be made to the ~~Executive Secretary~~ Director in accordance with that plan
- ~~5.3~~ The ancillary equipment will be taken out of service until the cause of the spill has been determined and repaired

~~6-4~~ Once the ancillary equipment has been repaired, 24 hour notification shall be provided to the ~~Executive Secretary~~Director prior to placing the system back into service

#### 4.22.2 Damage to the evaporation pond liner

1. The ancillary equipment will be taken out of service immediately
2. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting or ~~designees~~
4. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the pond liner within 48 hours after receiving notification
5. Once the pond liner has been repaired 24 hour notification shall be provided to the ~~Executive Secretary~~Director prior to placing the system back into service
- ~~6~~ Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting~~ or ~~designee~~
- ~~7-6~~ The ~~Director of~~Manager, Compliance and Permitting will provide just cause in writing to the ~~Executive Secretary~~Director.
- ~~8-7~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~Director, the QAM or the ~~Director of~~Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- ~~9-8~~ The ~~Director of~~Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.23 Contingency Actions for Qualitative BAT Performance Standards

##### 4.23.1 Failure to complete inspections as required

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately
2. The Facility Operator or BAT Inspector will perform missed inspection
3. The Manager, Waste Disposal Operations ~~applicable Site Director or designee~~ will notify the QAM and Manager, Compliance and Permitting or ~~designees~~
4. The QAM or the ~~Director of~~Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of confirmation
5. The ~~Director of~~Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery

## 4 23 2 Failure to Comply with Waste Disposal Location Requirements

- 1 Upon discovery the Applicable Site Director or designee will be notified immediately ~~Notify the Manager, Waste Disposal Operations~~
2. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designee
- 3 The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of confirmation
- 4 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.
- 5 The waste will be removed from the location and disposed of in the correct location
- 6 Follow up sampling will be performed to ensure that all waste material placed incorrectly has been completely removed and a report containing sample analytical results will be submitted for DRC approval Upon approval, waste placement within the sampled area may resume.

## 4 23 3 Disposal of Unauthorized Wastes

- 1 Upon discovery the Applicable Site Director or designee will be notified immediately ~~Notify the Manager, Waste Disposal Operations~~
- 2 The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees
3. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC
- 4 The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification in accordance with the Permittee's Radioactive Material License

~~4 23 4 Failure to Construct as Per Approval Designated in I E 3~~

- ~~1 Upon discovery the Applicable Site Director or designee will be notified immediately~~
- ~~2 The Applicable Site Director or designee will notify the QAM and Director of Compliance and Permitting or designees~~
- ~~3 The QAM or the Director of Compliance and Permitting or designee will provide verbal notification to the DRC~~
- ~~4 The Director of Compliance and Permitting or designee will provide written notification in accordance with the Permittee's Radioactive Material License~~

~~4 23 4~~ 23 4 Failure to Complete a Portion of the Disposal Cell Within the Applicable Open Cell Time Limit

1. ~~Upon discovery the Applicable Site Director or designee will be notified immediately~~ Notify the Manager, Waste Disposal Operations
2. ~~The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of~~ Manager, Compliance and Permitting or designees
3. ~~The QAM or the Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of discovery
4. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

~~4-23-64~~ 23 5 Failure to Comply with General Stormwater Management Requirements and Performance Criteria

1. ~~Upon discovery the Applicable Site Director or designee will be notified immediately~~ Notify the Manager, Waste Disposal Operations
2. ~~The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of~~ Manager, Compliance and Permitting or designee
3. ~~The QAM or the Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of discovery
4. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery

~~4-23-74~~ 23 6 Failure to Comply with 11e.(2) Waste Management and Storage Requirements

1. ~~Upon discovery the Applicable Site Director or designee will be notified immediately~~ Notify the Manager, Waste Disposal Operations
2. ~~The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of~~ Manager, Compliance and Permitting or designees
3. ~~The QAM or the Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of discovery
4. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery

~~4-23-84~~ 23 7 Failure to Comply with LLRW Waste Management Requirements

1. ~~Upon discovery the Applicable Site Director or designee will be notified immediately~~ Notify the Manager, Waste Disposal Operations
2. ~~The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of~~ Manager, Compliance and Permitting or designees

- 3 The QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of discovery
- 4 The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery



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# ENERGYSOLUTIONS

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March 8, 2013

CD13-0038

Mr. Rusty Lundberg  
Co-Director  
Utah Division of Water Quality  
P.O. Box 144850  
SLC, UT 84114-4850

RECEIVED

MAR 12 2013

DEPARTMENT OF  
ENVIRONMENTAL QUALITY

**DRC - 2013 - 001562**

Re: Ground Water Quality Discharge Permit No. UGW 450005 – Revised Request for Modification to Appendix J and K; Response to DRC Letters dated February 5, 2013 and November 26, 2012

Dear Mr. Lundberg:

In a letter dated November 8, 2012 (CS12-0286), EnergySolutions requested approval of proposed modifications to Appendix J, *BAT Performance Monitoring Plan* and Appendix K, *BAT Contingency Plan*. In a letter dated November 26, 2012, DRC responded to this request. Additionally, DRC summarized in a letter dated February 5, 2013, findings, recommendations, and requested additional information resulting from a BAT inspection conducted at our Clive facility by Division staff on January 17, 2013. Enclosed please find a response to the request for additional information resulting from the BAT inspection and revised BAT submittals (including responses to initial DRC comments on each subject requested in our preliminary submittal).

DRC suggested several recommendations as a result of their January 17, 2013 BAT inspection.

1. **DRC recommends EnergySolutions return to the best practice of storing the inspection rod in its sheathing pipe on the wall of the Rotary Dump facility to insure it is available.**

EnergySolutions will consider revising the practice, as recommended.

2. **DRC recommends cleaning the sight glasses in the east side manholes and removing the excess dye to reduce the potential for false positive readings.**

This was completed the day of DRC's inspection.

- 3. DRC recommends review of appropriateness in revising the inspection criteria for water level in the drainage system between Tracks 2 and 3 to mirror similar requirements applied to other elements of storm water management system (i.e., inspect against the level at the top of the grate).**

*EnergySolutions* agrees and has included these revisions in the *BAT Performance Monitoring Plan*, enclosed for DRC approval.

DRC also requested additional information as a result of their January 17, 2013 BAT inspection.

- 1. DRC requested *EnergySolutions* provide justification for not continuing to conduct BAT inspections at the Decontamination Access Control Building when it is "out of service".**

As part of removal of this building from service, all water connections to the building were removed. Additionally, the building was fully locked down (which condition is regularly checked by security staff) and access eliminated without the presence of security and health physics oversight. Because BAT inspections are designed to minimize the risk that potentially contaminated water may be released from a given facility into the general environment, the steps taken to remove the Decontamination Access Control Building from service place it in a condition wherein BAT inspections are no longer applicable.

- 2. DRC noted that Appendix J does not include a formal discussion of the requirements necessary to change a facility's service status.**

*EnergySolutions* agrees and has included these revisions in the *BAT Performance Monitoring Plan*, enclosed for DRC approval.

- 3. DRC suggests *EnergySolutions* seek prior approval from DRC before changing a facility's service status.**

*EnergySolutions* agrees and has included these revisions in the *BAT Performance Monitoring Plan*, enclosed for DRC approval.

DRC also provided initial comments on EnergySolutions' preliminary BAT submittal (summarized below with subsequent responses by EnergySolutions' on each BAT subject).

**1. Remove Table 1 from Appendix J.**

DRC commented that Table 1 is useful for DRC staff when conducting inspections. In order to reduce redundancy within Appendix J while retaining the useful features of Table 1, narrative text has been deleted from Section 4 where it repeats points of compliance summarized in Table 1. Text has been retained in Section 4 when it provides helpful description of the facility design or extended point of compliance information not suitable for summary in Table 1. Furthermore, Table 1 has been revised to explicitly state inspection frequency, performance criteria as point of compliance, and added a column to specify where each item is documented.

**2. Revise BAT inspection frequency to weekly.**

DRC suggested that some facilities may be appropriate for weekly inspections but that others would continue to require daily inspection. EnergySolutions has revised Table 1 and the associated inspection forms to specify daily inspections of the evaporation ponds and wastewater conveyance systems; plus a stormwater-triggered inspection of facilities that could accumulate water from precipitation events. Weekly and monthly inspection requirements are also clarified.

**3. Organizational titles and responsibilities are updated to reflect the revised facility organization submitted to DRC on October 24, 2012.**

DRC had no comment on these changes.

**4. Minor edits are made throughout to improve clarity and reduce redundancy.**

These edits are not intended to change the point of compliance. DRC commented that these edits may not be appropriate if the inspection frequency was unchanged. Much of the narrative text is now proposed to be eliminated from Section 4 of Appendix J. Therefore, redline/strikeout of the entire document is presented against the current approved version so that all proposed edits are clearly presented for review.

- 5. Appendix J, Section 4.20.9 is revised to remove the requirement that a Professional Engineer perform the annual pressure test of pipe-in-pipe systems.**

DRC commented that this change would not be acceptable. The current submittal reverts to existing language; however, clarification is added recognizing authorized use of an in-house Professional Engineer. The section number is changed due to other edits within Section 4 of Appendix J.

- 6. Quality assurance requirements are reduced.**

DRC commented that eliminating QA review and biweekly surveillances would not be acceptable. *EnergySolutions* has reverted to prior language for QA review; and proposes that the surveillance schedule be relaxed to monthly to reflect weekly facility inspections.

- 7. Attachments 1 through 4 of Appendix J are revised to reflect the above changes.**

Attachments 5 and 6 are rendered obsolete with the change to weekly inspection and are removed. Attachment 7 inspection of the DU Storage Building is incorporated into Attachment 1, and Attachment 7 is removed. DRC commented that these changes could not be approved until inspection frequency is agreed. *EnergySolutions* has revised and consolidated the inspection forms to match the inspection frequency changes proposed in Table 1. The forms have also been revised to provide a more user-friendly format for inspectors and reviewers.

- 8. Appendix K, Section 4.23.4, "Failure to Construct as per Approval Designated in I.E.3" is removed.**

DRC commented that this change would not be acceptable. The current submittal reverts to existing language.

In addition, the following new changes are proposed:

1. Appendix J, Section 1 has been edited to include requirements for characterizing a facility's operational status as "in-service" or "out-of-service." Additionally, DRC notification is specified for changes in inspection frequency that are triggered by change in a facility's operational status (e.g., taken in to or out of service).

2. Appendix J, Section 2 has had new definitions for “Container Storage Compliance” and “Weekly Inspection” added. The definition “Discrepancy Relating to Pad Integrity” has been re-titled “Surface Integrity Discrepancy” to fit more easily within the revised format of Table 1.
3. Appendix J, Sections 4.1, 4.2, 4.4, 4.5, and 4.6 have been combined into a single section to reduce redundancy. This change is consistent with the current approved Appendix K. Text has been added to Section 4.1 to clarify Mixed Waste Evaporation Pond inspection requirements.
4. Appendix J, Section 4.7 and Appendix K, Section 4.5, “LARW, Class A, and Class A North Collection Lysimeters” are deleted. These sections duplicate requirements already captured in Appendix C to the GWQDP and are therefore redundant. The form “Collection Lysimeter Free Liquids Monitoring” should be moved to Appendix C.
5. Appendix J, Section 5 is deleted. Because Appendix K provides required timeframes for action to address BAT failures regardless of whether spare parts are on site or not, a spare parts inventory should not be a point of compliance.

The requested revisions also impact the following items in the Permit:

1. Part I.E.10.a.9 should have the word “daily” deleted.
2. Part I.E.17 should have the word “daily” deleted.
3. Part I.F.2.m should have the word “independent” deleted.
4. Part I.F.12 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.12, Part I.F.12 could in fact be reserved as redundant.
5. Part I.F.16 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.16, Part I.F.16 could in fact be reserved as redundant.
6. Part I.F.17 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of

compliance are presented in Part I.F.17, Part I.F.17 could in fact be reserved as redundant.

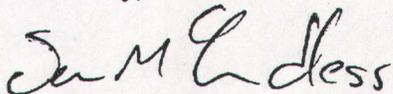
7. Part I.F.18 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.18, Part I.F.18 could in fact be reserved as redundant.
8. Part I.F.19 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.19, Part I.F.19 could in fact be reserved as redundant.
9. Part I.F.25 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.25, Part I.F.25 could in fact be reserved as redundant.
10. Part I.F.26 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.26, Part I.F.26 could in fact be reserved as redundant.
11. Part I.F.27 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.27, Part I.F.27 could in fact be reserved as redundant.
12. Part I.F.28 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.28, Part I.F.28 could in fact be reserved as redundant.
13. Part I.F.29 should have the word “daily” deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.F.29, Part I.F.29 could in fact be reserved as redundant.
14. Part I.G.4.c should have the word “daily” deleted.

15. Part I.H.19 should have the word "daily" deleted. Because the BAT Performance Monitoring Plan is already incorporated at Part I.F.22 and no unique points of compliance are presented in Part I.H.19, Part I.H.19 could in fact be reserved as redundant.

16. Part I.H.20 should have the word "daily" deleted.

Please contact me at 801-649-2000 with any questions regarding this issue.

Sincerely,



Sean McCandless  
Manager, Compliance and Permitting

enclosures

cc: John Hultquist, DRC  
Phil Goble, DRC (w/encl)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Permit No. UGW450005

APPENDIX J

Groundwater Quality Discharge  
Permit BAT Performance Monitoring  
Plan

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Ground Water Quality Discharge Permit UGW 450005 Appendix J: BAT Performance Monitoring Plan

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## 1 INTRODUCTION

EnergySolutions, LLC (EnergySolutions) has been granted a Groundwater Quality Discharge Permit, (GWQDP) Permit No. UGW450005 hereinafter called the Permit, by the State of Utah. The Permit specifies the construction, operation, and monitoring requirements for all EnergySolutions facilities that have a potential of discharging pollutants that may move directly or indirectly into groundwater. To cause the maximum reduction of pollutants achievable, the Permit specifies that "Best Available Technology" (BAT) be used in the construction of all facilities and that facilities be operated according to "Best Management Practices".

The Permit lists individual facilities that have BAT criteria associated with them. This BAT monitoring plan addresses the facilities and their BAT description and performance criteria (Table 1).

The Permit requires that EnergySolutions develop and follow a monitoring, inspection and maintenance plan for permitted facilities. BAT inspections are required to be performed daily for those BAT Compliance Monitoring Points noted on Form 1; weekly for those BAT Compliance Monitoring Points noted on Form 2; and monthly for those BAT Compliance Monitoring Points noted on Form 3. Additional daily inspections for those BAT Compliance Monitoring Points noted on Form 1a are required after precipitation events of greater than 0.1 inch, until such time that all stormwater accumulation has been removed; and on Form 1b when managing PCB wastes at the shredder facility on a daily basis at the site. On weekends or holidays when operational activities are not occurring, the daily BAT inspections can be postponed until the next regular work day. The BAT inspections are required on weekends or holidays if operational activities are taking place.

BAT inspections may be suspended at a facility that has been taken out of service for repairs or due to lack of operational need to use the facility. Any facility taken out of service is not permitted for waste storage or management and shall be secured in such a manner so as to minimize ponding of additional water while out of service. DRC will be provided at least 48 hours email notification of the intent to take a facility out of service. Additionally, regularly schedule BAT inspections will resume and DRC will be notified by email when a facility returns to service.

If failure of BAT occurs at any facility, the BAT Contingency Plan located at Appendix K to the GWQDP shall be implemented.

## 2 DEFINITIONS

### Access Pipe:

A pipe placed to provide access for the monitoring of leak detection system BAT performance criteria.

**Allowable leakage rate:**

Volume of fluid allowed to enter into leak detection systems through the upper flexible membrane liner of the evaporation ponds, averaged over a seven-day period. Volumes up to the allowable leakage rate do not constitute a failure of BAT.

**Best Available Technology (BAT):**

The application of design, equipment, work practice, operation standard or combination thereof, at a facility to effect the maximum reduction of a pollutant achievable by available processes and methods taking into account energy, public health, environmental and economic impacts and other costs.

**BAT Compliance Monitoring Points:**

Designated points of inspection, sampling, analysis, and monitoring to confirm compliance with the Permit.

**Bor-o-scope:**

Specialized equipment used to perform annual-video inspection of the entire length of the drainage pipe of each collection lysimeter and inspection of other BAT piping as needed.

**BAT Contingency Plan (Appendix K to the GWQDP):**

Plan for regaining and maintaining compliance with Permit limits and for reestablishing compliance with best available technology. This plan will be implemented if any of the BAT Performance Criteria specified in this plan are not met.

**Contact Stormwater:**

Stormwater that has contacted waste, such as storm water within the Disposal Cells, Rail Rollover Facility, Rotary Dump Facility, or Intermodal Unloading Facility (IUF).

**Container Storage Compliance:**

In accordance with Part I.E.10.a, containers in storage at facilities other than the Class A West or 11e.(2) disposal cell shall meet the following criteria:

- Closed, strong tight container
- Labeled with generator, waste stream number, and date received
- Stored no more than 365 days before being taken to the disposal cell

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**Daily Inspection:**

For purposes of this plan, daily inspections are required any day that waste or water management activities occur. The daily inspection is not required on weekends or holidays if water and waste management activities are not being conducted. Waste management activities include shipment receipt, unloading, waste placement, or decontamination facility operation. Daily inspection items are defined on Table 1 and Forms 1, 1a, and 1b.

**Discrepancy relating to Pad Integrity:**

Either: 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width) or 2) any significant deterioration or damage of the pad surface.

**Exposed Pad:**

The surface of pad or concrete surface not covered with containers or process material.

**Freeboard:**

The vertical distance between the spillway elevation of fluid containment system and the water elevation.

**Free Drainage:**

The drainage of water from one designated area to another, including sloped surfaces and pipelines, in such a manner that water is not blocked or dammed by foreign material including sediment, debris, and other items not approved in the design and construction of a facility. Free drainage includes the movement of water aided by mechanical means such as sumps, pipelines, etc. Free drainage shall be maintained at all facilities as addressed in this plan.

**Gravity Flow:**

The free movement of water from a higher elevation to a lower elevation for water transfer to designated areas of the facility.

**Head/pressure transducer:**

An instrument used to detect, measure, and report the water level in a monitoring well or detection sump system.

**Leak Detection System:**

An engineered system designed to detect leaks in a low-permeability liner and capable of collecting and removing fluid present in the leak detection sump.

**Leak Detection Sump:**

A sump constructed between an upper and lower low-permeability liner that provides a collection point for detecting, measuring, and removing fluids that have leaked through the upper liner. When fluid is detected in the sump, it is an indication that the upper liner may be leaking.

**Non-contact Stormwater:**

Stormwater that has not contacted waste that is within the restricted area.

**Pad Integrity:**

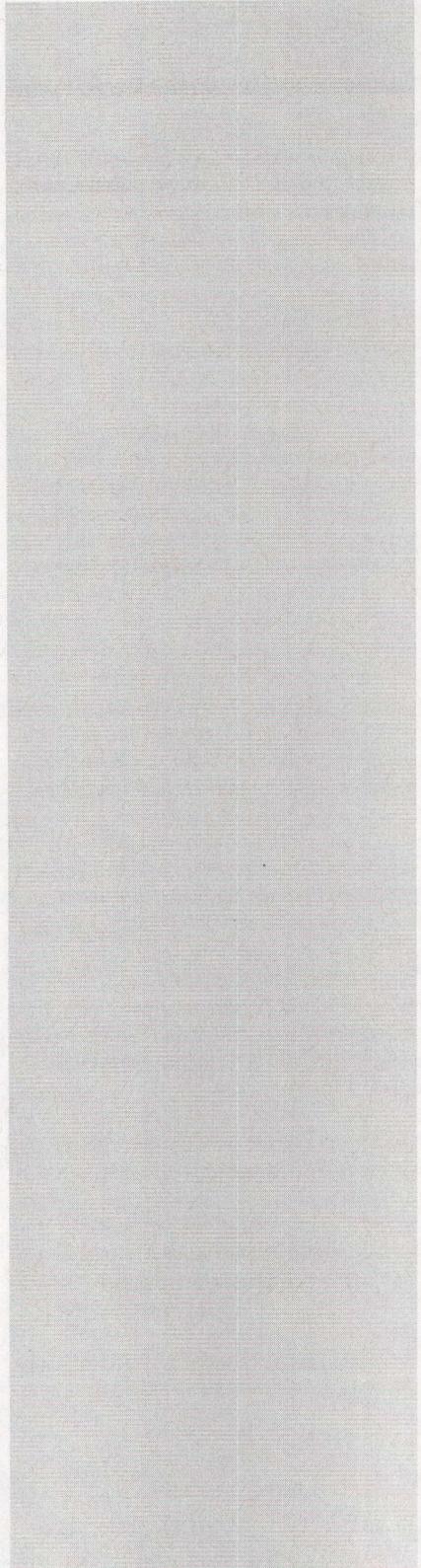
The physical integrity of a pad structure including but not limited to: the presence of cracks, ruptures, damaged or porous areas, areas of subsidence or thinning.

**Pump-back system:**

An automatic system that provides for the removal of liquids from the leak detection system and reconveyance of the liquids to the associated evaporation pond.

**Pump controller:**

An instrument that controls the activation and deactivation of the submersible pump.



**Pump-down test:**

A test that determines the accuracy of the leak detection system.

**Submersible pump:**

A pump specially designed and engineered for being submersed in water.

**Surface Integrity Discrepancy:**

Either: 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width) or 2) any significant deterioration or damage of the pad surface.

**Transfer Sump:**

A collection sump that is used to pump water from one point to another at the facility.

**Weekly Inspection:**

Weekly BAT inspections as defined in Table 1 and Form 2 are required to be performed once per week, whether the facility is in operation or not.

**Weir:**

A wall located in a settlement basin designed to control water flow to maximize sediment collection in the basin.

**Weir Notch:**

A notch located on a weir that allows water to flow from the settlement basin to an area in which water is collected for pumping.

### 3 RESPONSIBILITIES

The **Quality Assurance Manager (QAM)** or designee is responsible for performing surveillance and/or audit activities to verify implementation and compliance with the requirements of this plan and review of all designated forms as part of the quality assurance review for accuracy and completeness. The QAM is also responsible for providing required verbal notifications to regulatory agencies and the ~~Director of~~ Manager, Compliance and Permitting.

~~The **Director of Mixed Waste Operations and Director of LLRW Manager, Waste Disposal Operations** (or designees) are is~~ responsible for maintaining assigned facilities in compliance with BAT requirements of the Clive site at all times. ~~The applicable site~~ director Manager, Waste Disposal Operations (or designee) shall immediately notify the QAM when any BAT Failure occurs. ~~At the discretion of the Vice President of Clive, a full-time management position may be designated to act on behalf of both Directors to oversee the daily duties associated with inspecting BAT facilities.~~

~~The **Director of Health Physics (DHP) Manager, Health Physics and Safety Radiation Safety Officer (RSO)** or designee is responsible for performing~~ evaluations of any existing threat or potential threat to public health and the environment;

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as necessary, and determining sampling parameters for free liquid if present in the collection lysimeters in cooperation with the Director of Compliance and Permitting.

The **Facility Operator or BAT Inspector** performs the routine daily inspections and provides notification to the ~~Director of LLRW Manager, Waste Disposal Operations and Quality Assurance Manager, or designates~~ of any BAT non-compliance for the LLRW/11e.(2) Facility. The Facility Operator or BAT Inspector has the authority to initiate repairs when needed.

~~The Mixed Waste Facility Operator or designee perform the routine daily inspection and provides notification to the Director of Mixed Waste Operations, Quality Assurance Manager, or designates of any BAT non-compliance for the Mixed Waste Facility.~~

The **Site Hydrogeologist** or designee is responsible for performing collection lysimeter measurements and determining compliance.

The ~~Director of Manager, Compliance and Permitting~~ or designee is responsible for determining sampling parameters for free liquid if present in the collection lysimeters, reviewing all groundwater sampling data, and ~~performing reviewing of annual video inspection of the lysimeters.~~ The ~~Director of Manager, Compliance and Permitting~~ is responsible for providing required written notification to the regulatory agencies.

The ~~Director of Manager, Engineering and Maintenance~~ or designee is responsible for scheduling and oversight of pump down testing if required.

~~The Maintenance Manager or designee is responsible; and for performing preventative maintenance on facility equipment in accordance to the manufacturer specifications and guidelines, and ensuring that spare sump pump and replacement parts (including batteries for portable measuring devices, etc.) are on site at all times for required repairs.~~

#### 4 BAT PERFORMANCE MONITORING

EnergySolutions is responsible for implementing the ~~b~~Best ~~a~~available ~~t~~Technology, summarized in Table 1, ~~(BAT Monitoring and Performance Criteria Chart)~~, to prevent discharge of fluids from the following facilities to subsurface soils or groundwater. Table 1 provides a brief description of BAT for each facility, inspection requirements and frequency, performance criteria, and where each inspection requirement is documented. Compliance with the performance standard(s) will be evaluated by performing and documenting inspections, performing equipment maintenance and repairs as required, and by implementing corrective actions.

##### 4.1 1995, 1997, 2000, Northwest, and Mixed Waste Evaporation Ponds

Freeboard compliance at the 1995 Evaporation Pond is recorded with each daily inspection. ~~The results of the inspection are documented on the LLRW/11e.(2) Facility Daily Inspection Form (Attachment 1).~~

The 1995 Each Evaporation Pond is equipped with a leak detection and pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

In accordance with Part I.E.16, BAT for Mixed Waste facilities other than the Mixed Waste Evaporation Pond is defined by requirements of the State-issued Part B Permit. Accordingly, the Mixed Waste Evaporation Pond inspection is required only on days that Mixed Waste Facility daily inspections are required under the State-issued Part B Permit. Measurement of daily leak detection system flow volume is read from the flow meter and recorded every day operations are being performed. The total change (increase) is recorded and averaged over a seven day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2. The maximum allowable daily leakage volume for the 1995 Evaporation Pond is 162 gallons/day. If the calculated leakage rate is above 155 gallons/day a pump down test will be performed. A calculated leakage rate greater than 162 gallons/day is deemed a failure of BAT.

The leak detection system sump is inspected daily. An inspection of the system and preventative maintenance will be performed annually in accordance with CL EN-PR-023 (ENG 2.3), *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 1. The fluid head level is not to exceed a 1 foot level (readout above 1.0) above the lowest point in the lower flexible membrane liner. An exceedance of the 1 foot level is deemed a failure of BAT. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate on the first working day of the week from any measurements taken over the previous seven calendar days.

#### **4.2 — 1997 Evaporation Pond**

Freeboard compliance at the 1997 Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e.(2) Facility Daily Inspection Form (Attachment 1).

The 1997 Evaporation Pond is equipped with a leak detection pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

Measurement of daily leak detection system flow volume is read from the flow meter and recorded every day operations are being performed. The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2. The maximum allowable daily leakage volume for the 1997 Evaporation Pond is 171 gallons/day. If the calculated leakage rate is above 160 gallons/day a pump down test will be performed.

The leak detection system sump is inspected daily. An inspection of the system and preventative maintenance will be performed annually in accordance with CL EN PR 023 (ENG 2.3), *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 1. The fluid head level is not to exceed a 1-foot level (readout above 1.0) above the lowest point in the lower flexible membrane liner. An exceedance of the 1-foot level is deemed a failure of BAT. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate on the first working day of the week from any measurements taken over the previous seven calendar days.

#### **4.34.2 1995/1997 Pond Lift Station**

The 1995/1997 Pond Lift Station is designed and constructed to transfer wastewater from the Intermodal Unloading Facility IUF Lift Station and the Containerized Waste Storage Pad into either the 1995 Evaporation Pond or the 1997 Evaporation Pond.

The pond lift station is inspected daily for the activation of the visual alarm. The alarm will activate when the water level within the lift station rises above the lowest level of the inlet pipe. The alarm is inspected during the second week of each month. The inspection results will be recorded on Attachment 1.

#### **4.44.3 2000 Evaporation Pond Transfer Pad**

Freeboard compliance at the 2000 Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e.(2) Facility Daily Inspection Form (Attachment 1).

The 2000 Evaporation Pond is equipped with a leak detection pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

Measurement of daily leak detection system flow volume is read from the flow meter and recorded every day operations are being performed. The total change (increase) is recorded and averaged over a seven day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2. The maximum allowable daily leakage volume for the 2000 Evaporation Pond is 382 gallons/day. If the calculated leakage rate is above 355 gallons/day a pump down test will be performed.

The leak detection system sump is inspected daily. An inspection of the system and preventative maintenance will be performed annually in accordance with CL EN PR 023 (ENG-2.3), *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 1. The fluid head level is not to exceed a 1-foot level (readout above 1.0) above the lowest point in the lower flexible membrane liner. An exceedance of the 1-foot level is deemed a failure of BAT. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate on the first working day of the week from any measurements taken over the previous seven calendar days.

The 2000 Evaporation Pond Transfer Pad is designed and constructed with a gravity flow system to provide free drainage of water from the transfer pad to the collection sump collection area. The pad is inspected daily to ensure that free drainage conditions exist to the sump collection area and ensure concrete integrity. The sump collection area is inspected to ensure total containment of water.

#### 4.54.4 Northwest Corner Evaporation Pond Transfer Facility

Freeboard compliance at the Northwest Corner Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the LLRW/11e.(2) Facility Daily Inspection Form (Attachment 1).

The Northwest Corner Evaporation Pond is equipped with a leak detection pump-back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure.

Measurement of daily leak detection system flow volume is read from the flow meter and recorded every day that operations are being performed. The total change (increase) is recorded and averaged over a seven day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Evaporation Pond(s) Leak Detection System Volume Weekly Calculation Form, Attachment 2. The maximum

allowable daily leakage volume for the Northwest Pond is 326 gallons/day. If the calculated leakage rate is above 300 gallons/day a pump down test will be performed. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

The Facility Operator or BAT Inspector is responsible for performing and documenting inspection results, and calculating the average daily leakage rate on the first working day of the week from any measurements taken over the previous seven calendar days.

The Northwest Pond Transfer Facility was constructed and designed for trucks to collect and discharge water on a containment surface. The concrete pad slopes towards the pond and an HDPE apron/rub sheet attaches to the edge of the concrete pad. The rub sheet extends down the slope of the pond providing for water transfer over rub sheets, thereby, reducing any negative effects on the pond liner. The pad is inspected monthly to ensure concrete integrity and the apron is inspected for any signs of cracks, holes, or tearing.

#### 4.6 — Mixed Waste Evaporation Pond

Freeboard compliance at the Mixed Waste Evaporation Pond is recorded with each daily inspection. The results of the inspection are documented on the Mixed Waste Evaporation Pond Daily Inspection Form (Attachment 3).

The Mixed Waste Evaporation Pond is equipped with a leak detection pump back system that includes the following: Flow meter, pressure transducer, submersible sump pump, process controller/monitor, and discharge line. The leak detection system pumping and monitoring equipment must be inspected daily to ensure continuous operation. Failure of any pumping or monitoring equipment not repaired and made fully operational within 24 hours of discovery is deemed a BAT failure. Piping that carries water to the pond from the leak detection system is inspected during the second week of each month for signs of leakage by observing the manual removal of water from the system.

Measurement of daily leak detection system flow volume is read from the flow meter and recorded every day operations are being performed. The total change (increase) is recorded and averaged over a seven-day period to determine the calculated daily leakage rate. The weekly calculations are documented on the Mixed Waste Evaporation Pond Leak Detection System Volume Weekly Calculation Form, Attachment 5. The maximum allowable daily leakage volume for the Mixed Waste Evaporation Pond is 171 gallons/day. If the calculated leakage rate is above 160 gallons/day a pump down test will be performed.

The leak detection system sump is inspected daily. An inspection of the system and preventative maintenance will be performed annually in accordance with CL-EN-PR-023 (ENG 2.3), *Annual Evaporation Pond Pump Inspection*. The process controller is read to measure fluid head. The measurement is documented on Attachment 3. The fluid head level is not to exceed a 1 foot level (readout above 1.0) above the lowest point in the

lower flexible membrane liner. An exceedance of the 1-foot level is deemed a failure of BAT.

The Mixed Waste Facility Operator or designee is responsible for performing and documenting inspection results, and calculating the average daily leakage rate on the first working day of the week from any measurements taken over the previous seven calendar days.

#### **4.7 — LARW, Class A, and Class A North Cell Collection Lysimeters**

The LARW, Class A, and Class A North Cell Collection Lysimeters are monitored in accordance with Appendix C, *Specifications and Operation, Maintenance, and Closure Plans for Collection Lysimeters and Related Approvals* by the Site Hydrogeologist for the presence of liquids. An annual video inspection will be performed by the Site Hydrogeologist or designee using a bore scope.

Monitoring will be performed using an electronic water level probe to measure for free liquids in the lysimeter. Free liquid is not allowed in the standpipe to be less than 12 inches below the intersection of the transfer pipe. Liquids less than 12 inches below the intersection are deemed a failure of BAT. Any liquid present will be purged using a peristaltic pump or dedicated PVC bailer. Free liquid measurements obtained and the time and date of the measurements will be recorded on the Monitoring For Free Liquids Form (Attachment 4).

It is anticipated that the volume of free liquids in the standpipe will be limited and that if free liquids are present, the available quantities will restrict the chemical and radiological analyses to only a few select constituents. If and when free liquids appear in a collection lysimeter, the characteristics of the waste disposed in the general area will be evaluated and chemical and radiological constituents selected by the DHP and Director of Compliance and Permitting. Selection of analytical parameters will be based on highest mobility and probability of occurrence in the leachate, and the amount of liquid available for sampling.

NOTE: *Lysimeters are not required to be sampled if free liquid is not present in the standpipe.*

#### **4.84.5 Rail Rollover Facility**

The Rail Rollover Facility is designed and constructed to aid in the unloading of waste from railcars. The BAT operation standard at the Rail Rollover Facility is to prevent stormwater from contacting waste. The Rail Rollover Facility is equipped with a concrete berm directing water flow to a concrete trough, a settling basin, and a collection sump. The berm has been constructed to channel surface flow of stormwater away from the rollover pit to a trough. Water free drains from the trough through the settling basin and into the sump. Water is transferred from the sump via double piping (pipe in pipe) to the

manhole ~~at~~ near the ~~former~~ Rail Wash Facility on Track 2, with further free drainage to the 1995 and 1997 Evaporation Ponds by way of the IUF Lift Station. The piping from the sump to the manhole is sloped so that if a leak should develop in the internal pipe, water will flow back to the sump in the external pipe.

The facility is inspected daily to ensure that ponded water does not exist within the covered area of the facility, the sump pump is operational (water level will be maintained below the grate), and free drainage conditions exist from the berm to the trough to the settling basin and sump. The berms, trough, settling basin, and sump shall be cleaned weekly or when sediment levels restrict free drainage. The results of the daily inspection are recorded on Attachment I. In addition, the Rollover Facility is taken out of service and inspected annually during the second quarter, to ensure integrity of the asphalt ramps and the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.

#### 4.94.6 Containerized Waste Storage Pad

The Containerized Waste Storage Pad is designed and constructed with a gravity flow system to providing drainage of stormwater to the 1995/1997 Pond Lift Station.

A daily inspection is performed by the Facility Operator or BAT Inspector to ensure free drainage to the sump, that the sump is operational, ensure that the exposed pad is free from dirt and debris, and to ensure pad integrity. Cracks, ruptures, damaged, or porous areas found in the asphalt surface shall be sealed or repaired, and areas of subsidence will be filled and returned to its original design grade within 10 days of discovery. All containers are inspected for leakage, proper storage and labeling. Leakage of waste shall be remediated by immediate container overpack or by proper disposal in the embankment. The inspection results are recorded on Attachment I.

#### 4.104.7 Intermodal Unloading Facility (IUF)

The Intermodal Unloading Facility ~~IUF~~ is designed with a gravity flow system to the IUF Lift Station collection manhole. A sump pump is located within the manhole and pumps to a drain line to the 1995/1997 Pond Lift Station.

The Intermodal Unloading Facility is inspected daily by the Facility Operator or BAT Inspector to ensure free drainage to the sump, that the sump pump is operational, to ensure that the exposed pad is free from dirt and debris, and to ensure exposed pad integrity and free draining conditions on both the unloading pad and in the stormwater drainage pipeline system. Results of the inspection are recorded on Attachment I.

In addition, the ~~The~~ Intermodal Unloading Facility ~~IUF~~ is inspected annually during the second quarter to ensure integrity of the concrete surfaces. The inspection may occur one bay at a time. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the affected ~~inspected~~ bay. The results of the bay

inspections are documented in an engineer's report. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.

#### 4.114.8 *Intermodal Unloading Facility Lift Station*

The Intermodal Unloading Facility (IUF) Lift Station is designed and constructed to provide for the drainage of collect wastewater from the Rail Wash Facility on Track No. 2, the Intermodal Unloading Facility (IUF), the Railcar Digging Facility, and the Rail Rollover Facility for transfer via gravity flow to the 1995/1997 pond lift station.

The Intermodal Unloading Facility Lift Station is inspected daily for the activation of the visual alarm. The alarm will activate when the water level within the lift station rises above the lowest level of the inlet pipe. The alarm is inspected during the second week of each month. The inspection results will be recorded on Attachment 1.

#### 4.124.9 *LARW Box-Washing Facility*

The LARW Box-Washing Facility is designed and constructed to provide free drainage of washwater from the wash pad to the floor sumps and through across the wastewater drainage pipeline to the concrete holding tanks. The former drain line from the facility to the 1995/1997 pond lift station has been capped and the drain line abandoned.

The LARW Box-Washing Facility is inspected daily by the Facility Operator or BAT Inspector to ensure that free drainage conditions exist to the floor sumps through the wastewater drainage pipeline to the concrete holding tanks. The sump area is inspected to ensure that the sump pump is operational. The concrete surface is inspected to ensure that the exposed pad is free from dirt and debris, and to ensure concrete integrity. The holding tanks are inspected to ensure that the water level is maintained at or below three-quarters full. The cap placed over the outlet from the facility is inspected for integrity. The inspection results will be recorded on Attachment 1.

#### 4.134.10 *Rail Wash Facility on Track No. 4*

The Rail Wash Facility on Track No. 4 is designed and constructed to provide free drainage of washwater from the rail wash floor and concrete trench to the floor sumps and through the piping that discharges to the collection tank(s) of the adjacent equipment/mechanics building.

The Rail Wash Facility on Track No. 4 is inspected daily by the Facility Operator or BAT Inspector to ensure that free drainage conditions exist in the concrete trench and the rail wash pads to the floor sumps for discharging to the collection tank(s) of the adjacent equipment/mechanics building. The sump is inspected to ensure that the sump pump is operational. The collection tank(s) and gray water discharge pump are inspected daily to verify that the system is functioning. The concrete surface is inspected to ensure that the exposed pad is free from dirt and debris, and to ensure concrete integrity. The rail wash pads are inspected to ensure total containment of water and that they do not cause a direct

or indirect discharge to subsurface soils or groundwater (overflow). The results of the inspection are recorded on Attachment 1.

#### 4.144.11 ***Rail Digging Facility***

The Rail Digging Facility located between Track No. 3 and Track No. 4 is designed and constructed to provide free drainage of stormwater from the asphalt containment pad and ramps to three concrete collection basins. Water from the collection basin drains to a settling basin, for a total of 4 sumps requiring inspection. Water continues to drain through piping to the digging facility manhole, continuing on to the Intermodal Unloading Facility IUF Lift Station. The Rail Digging Facility is designed for the digging of waste from rail cars and placement of waste within transferring it to hauling equipment. No waste storage will occur.

The Rail Digging Facility is inspected daily by the Facility Operator or BAT Inspector to ensure that free drainage conditions exist from the asphalt containment pad to the concrete collection basins. The collection basins are inspected to ensure that water levels are not above the level of the grates and the settling basin is inspected to ensure that the water level is not above the elevation of the outlet pipe. The digging facility manhole located on the west side of track 2 directly west of the Rail Digging Facility settling basin will be inspected for any sign of leakage. The concrete area and the asphalt surfaces are inspected to ensure that the exposed pad is free from dirt and debris, and to ensure pad integrity. The results of the inspection are recorded on Attachment 1.

#### 4.154.12 ***East Truck Unloading Area***

The East Truck Unloading Area includes the Container Holding Pads, Unloading Dock with Ramp and Unloading Area asphalt surfaces. The facility is designed with a gravity flow system to direct stormwater accumulated on the asphalt surfaces away from the concrete container holding pads. The concrete container holding pads are designed with a gravity flow system to direct water that accumulates on the concrete surface to collection troughs.

The Container Holding Pads are inspected daily to ensure gravity flow to the collection troughs, ensure that water level in the troughs does not exceed three quarters full, ensure that exposed surfaces of the container holding pads are free from dirt and debris, and ensure structural integrity of container holding pad, curb, and trough exposed surfaces. Overnight storage is prohibited at the dock and on asphalt surfaces within the facility. Storage and sampling are restricted to the concrete holding pads. Containers may be placed temporarily on the asphalt surface to facilitate transfer. Temporary is defined as the current acceptance date on the Bates Label. Therefore, this prohibits overnight storage.

#### 4.164.13 ***Decontamination Access Control Building***

The Decontamination Access Control Building is designed and constructed to provide personnel access to the Restricted Area. The design provides for free drainage from the

facility to the wastewater collection tank buried outside the southwest corner of the building.

The facility is inspected daily to ensure free drainage to the wastewater collection tank from the bootwash, respirator sink, shower, and sink located next to the shower, to ensure that the water remains at a level below the bottom elevation of the inlet pipe, ensure that visual alarm is not currently activated, ensure automatic removal of water from the tank as necessary, and ensure that there is no fluid within the discharge pipe and tank leak detection systems. The visual alarm for water level is inspected during the second week of each month.

#### 4.174.14 *Intermodal Container Wash Building*

The Intermodal Container Wash Building is used for the decontamination of containers. It was designed with a leak detection system and constructed in order to provide for the free drainage of washwater from the bootwash, and washbays to the sediment basin.

The Intermodal Container Wash Building is inspected daily to ensure the free drainage of water from the bootwashes to the trough, from the wash bays through troughs to a sediment basin, and to ensure that the water level in the sediment basin remains below the weir grate and that the automatic discharge pump system is operational. The leak detection ports are inspected daily for the presence of fluids. The exposed concrete surfaces are inspected daily to ensure surface integrity. The results of the inspection are recorded on Attachment I.

#### 4.184.15 *Shredder Facility*

The Shredder Facility is used to size-reduce debris wastes prior to disposal. It is designed to provide free drainage to seven catchbasins, which then drain to the sump in the Rotary Dump Facility before being pumped into the Northwest Corner Evaporation Pond.

An alternate wastewater management system provides for the removal of water from manhole 1 via the use of a submersible pump and pipeline to water storage tanks located on the concrete pad. This system ~~will~~ may be used during the shredding of PCB waste or optionally when the drainage system to the Rotary Dump Facility or Northwest Corner Evaporation Pond is out of service. When in use, the alternate wastewater management system and associated valves will be inspected to ensure that the associated valves are in the proper position, the pipeline is not leaking, and the high water level alarms are not activated.

The facility is inspected daily to ensure free drainage of water from the shredder facility to the catchbasins. In addition the water level within each catchbasin is inspected to ensure water is below the grate. Because the catchbasins are all located at least 3.5 feet lower in elevation than the top of Manhole 1, inspecting each catchbasin also functions as an inspection for functionality of the submersible pump in Manhole 1. The exposed concrete surfaces are inspected daily to ensure integrity. The results of the inspection are recorded on Attachment I. When PCB-Containing waste is stored on the Shredder Pad,

additional inspection criteria will be followed in accordance with the TSCA Approval for Shredding Polychlorinated Biphenyl (PCB) Wastes. The Facility Operator will inspect the facility prior to the end of shift to ensure that all outfeed material has been removed from the outfeed pad. The results of the inspection are recorded on Attachment 1.

The Shredder Facility is taken out of service and inspected annually during the second quarter, to ensure integrity of the concrete surfaces and to ensure that system valves are operating as designed. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report. Additional reporting may be required in accordance with the TSCA Approval for Shredding Polychlorinated Biphenyl (PCB) Wastes.

#### 4.19.16 Rotary Dump Facility

The Rotary Dump Facility is designed and constructed for the thawing, emptying, and washing of railcars. It includes 4 sub-facilities. The Rotary Dump Facility is taken out of service and all areas are inspected annually during the second quarter, to ensure integrity of the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs shall be made prior to resuming the use of the facility. The results of the inspection are documented. The inspection findings, any repairs required, and repairs completed are included in the Semi-annual BAT Monitoring Report.

##### 4.19.14.16.1 Thaw Building

The railcars enter the Thaw Building where wall and floor heaters provide heat as necessary to thaw the material for dumping. The rail in the thaw building is underlain with a flexible membrane liner covered with a granular surface. If any liquid is generated, the liquid drains into the granular surface, and is captured by the flexible membrane liner. The liquid then gravity drains via perforated pipe installed above the flexible membrane liner to a collection pipe. The collection pipe located under the granular surface is covered with geotextile material to prevent intrusion from material that may block the pipe. The wastewater free drains via a four-inch PVC pipe that discharges to the West side of the Rotary Building floor. The pipe from the Thaw Building is located one foot off of the Rotary Building floor.

The concrete surface at the east end of the Thaw Building is inspected to ensure concrete integrity. The granular surface area is inspected daily for ponding of water to ensure free drainage to the Rotary Building Floor. The drainage pipe from the Thaw Building is inspected to ensure that no blockage exists. The results of the inspection are recorded on Attachment 1.

##### 4.19.24.16.2 Rotary Building

The Rotary Building is designed for the dumping of waste from railcars onto the Rotary Building Floor. While dumping is in process, water cannons may be used to remove excess material from the railcar. It is anticipated that the water used by the water

cannons will be absorbed into the dumped material and provide required dust suppression to reduce fugitive emissions. The Rotary Building floor is sloped for free drainage of wastewater to the sediment basin. Daily, upon completion of active waste management activities, an inspection is performed to ensure that no freestanding liquids exist on the building floor. Results of this inspection are recorded on Attachment 7. Wastewater within the sediment basin is pumped via the use of a submersible pump and pipeline to the Northwest Corner Evaporation Pond or wastewater storage tanks at the Alternate Wastewater Management Area.

Routing of wastewater at the facility is controlled by locking valves. When the valve in the pipeline to the pond is in the "Closed" position and the valve in the pipeline to the tanks is in the "Open" position, the wastewater is transferred to the Alternate Wastewater Management Area. Notification to the Executive Secretary/Director is required. When the locking valve in the pipeline to the tanks is in the "Closed" position and the valve in the pipeline to the pond is in the "Open" position, the wastewater is pumped to the Northwest Corner Evaporation Pond. The pipeline to the Northwest Corner Evaporation Pond is dual walled from the point where it exits the building to the discharge point in the pond.

The rotary building is inspected daily for active waste management. If active waste management is not being performed, the facility floor is inspected for the presence of free standing liquid that may indicate lack of free drainage to the sediment basin. The leak detection system ports at the sediment basin are inspected for the presence of fluids. The water level within the sediment basin is inspected to ensure that the water level is maintained at or below the grate. The leak detection system, for the dual pipeline to the pond, is located in the southwest corner of the pit and is inspected by opening a valve to determine if water is present in the containment space between the pipes. The valve is closed when the inspection is completed. The results of the inspection are recorded on Attachments 1 and 7.

#### 4.19.34.16.3 Wash Building

The Wash Building is designed for the decontamination of railcars. Non-contaminated water is provided via four 2,500 gallon water storage tanks. Water used in the decontamination process gravity drains via two trenches to a drain pipe. Water from the drain pipe gravity drains to the sediment tank located on the floor of the rotary dump building. The sediment tank is designed with an overflow that drains from the sediment tank onto the Rotary Building floor surface to the sediment basin. Water within the sediment tank supplies the water cannons within the Rotary Building.

The wash building is inspected daily to ensure that the water free drains to the trenches and that the water level within the trenches remains below the grates. The concrete surface is inspected for integrity including all trenches and curbing at the east end of the building and surface seals around the stairway footing. The results of the inspection are recorded on Attachment 1.

#### 4.19.44.16.4 Alternate Wastewater Management Area

The wastewater from the sediment basin is transferred via submersible pump and pipeline to two wastewater storage tanks or to the Northwest Corner Evaporation Pond. A locking valve in the pipeline to the Alternate Wastewater Management Area (tanks) is opened and a locking valve in the pipeline to the pond is closed when the tanks are placed in service. Notification to the ~~Executive Secretary~~ Director is provided when the Alternate Wastewater Management Area is placed in service. Each tank is equipped with a float switch that triggers activation of a visual alarm when the water level reaches two feet from the top of the tank. The pipeline transfers wastewater to both tanks. Reuse of the wastewater from these storage tanks at the wash building is prohibited. The tanks are located on a concrete surface.

~~The Alternate Wastewater Management Area is inspected daily when in use indicated by the valve in the "Open" position, or marked N/A on the Daily Inspection Form when not in use. The facility is inspected daily when in service to ensure concrete surface integrity and maintenance of free drainage to the rotary building floor. The tanks are inspected for signs of leakage and to ensure that the visual alarms have not been activated. All valves and piping associated with the wastewater storage tanks are maintained to prevent wastewater from escaping the concrete surface. The results of the inspection are recorded on Attachment 1.~~

~~The Rotary Dump Facility will be taken out of service and inspected annually during the second quarter to ensure integrity of the ramps and the concrete surfaces. If discrepancies are noted per the definition listed in this plan, repairs (if required) shall be made prior to resuming the use of the facility. The results of the inspection are documented. The annual inspection findings, any repairs required, and repairs completed will be included in the Semi-annual BAT Monitoring Report.~~

#### 4.20.4.17 East Side Drainage System

The East Side Drainage System is comprised of two separate drainage systems; one for wastewater from decontamination facilities, and one for stormwater. ~~The two drainage systems are designed to prohibit commingling, until released into the 1997 Pond. A process flow diagram of the system is provided as Figure 1.~~

The wastewater system is designed as follows: ~~The wastewater is pumped from the Decontamination Access Control Building, the Intermodal Container Wash Building, and the Rail Wash Facility on Track No. 4 within a dual walled pipe system to the 1997 Pond.~~

The Decontamination Access Control Building Tank, Intermodal Container Wash Building, and the Rail Wash Facility on Track No. 4 are each equipped with shut-off (isolation) valves. These valves when closed will isolate the respective facilities thereby preventing the flow of additional wastewater via the pipelines to the 1997 Pond. This allows for the isolation of facilities and, upon notification to the DRC, manual removal of wastewater for continued operation if a BAT failure or maintenance outage exists at

another facility connected to the drainage system or during scheduled maintenance or inspection of the drainage system.

**4.20.14.17.1 Decontamination Access Control Building Wastewater Flow and Monitoring**

Wastewater from the Decontamination Access Control Building drains to a double-walled collection tank outside of the building. A moisture leak detection sensor is located between the walls (annular) of the tank to detect moisture or leakage from the primary wall of the tank. A strobe alarm is located on the outside of the building adjacent to the tank that is activated by the sensor in the tank annular space. A second leak detection sensor is located within the containment pipe to detect a leak in the carrier pipe, which also activates the strobe alarm mounted on the outside of the building adjacent to the tank. A high water level float alarm set so as to maintain the water level in the tank below the level of the inlet pipe activates strobe alarms located inside the building above the boot wash and the respirator wash sink. An isolation valve (P1-V01) is located at the collection tank of the Decontamination Access Control Building. This isolation valve when closed will prevent additional wastewater from transfer to the Rail Wash Facility on Track No. 4.

**4.20.24.17.2 Rail Wash Facility on Track No. 4 Wastewater Flow and Monitoring**

Wastewater is pumped from the collection tank at the Decontamination Access Control Building to the Rail Wash Facility on Track No. 4 through a dual wall pipe designated as Pipeline No.1. The inside pipe of the dual wall system is designated as the carrier pipe and the outer pipe is designated as the containment pipe. Pipeline No. 1 discharges into the wash water collection tank at the Rail Wash Facility on Track No. 4. Wastewater from the Rail Wash Facility on Track No. 4 collection tank is pumped through a dual wall pipe (Pipeline No. 2) to Manhole No. 1. An isolation valve (P2-V01), is located at the collection tank at the Rail Wash Facility on Track No. 4. This isolation valve when closed will prevent additional wastewater transfer via Pipeline No. 2 to Manhole 1.

**4.20.34.17.3 Intermodal Container Wash Building Wastewater Flow and Monitoring**

Wastewater from the Intermodal Container Wash Building sump is pumped to Manhole No. 1 through a dual wall pipeline designated pipeline No. 3 where it connects (via manifold) with Pipeline No. 4. An isolation valve (P3-V01) is located at the sedimentation sump in the Intermodal Container Wash Building. This isolation valve will prevent additional wastewater from transfer via Pipeline No. 3 to Manhole No. 1 when closed.

**4.20.44.17.4 Manhole No. 1 Wastewater Flow and Monitoring**

Manhole No. 1 is a dry manhole (receives no storm or wastewater) that provides access to a manifold system connecting pipelines No. 2, 3, and 4. Manhole No. 1 is located in close proximity to the Rail Wash Facility on Track No. 2 near the SW corner of the building. Within Manhole 1, dual wall pipelines No. 2 and No. 3 are joined with a manifold and exit the manhole as dual wall Pipeline No. 4. routed to the 1997 Pond. Check valves prevent water from backflowing into Pipelines No. 2 and No. 3.

Wastewater flows from Manhole No. 1 to Manhole No. 2 via Pipeline No. 4 then to the 1997 Pond via the dual wall pipe designated as Pipeline No. 4a. A leak detection sensor and drip leg (2 total) is installed in each containment pipe of Pipelines No. 2 and No. 3 at Manhole No. 1 to detect leakage from the carrier pipes. The sensors activate a strobe alarm mounted to the exterior of the adjacent Track 4 Rail Wash Building. In addition, a sight canister is installed on each drip leg to collect any water, for visual detection, that may flow from the drip leg.

**4.20.54.17.5 Manhole No. 2 Wastewater Flow and Monitoring**

Pipeline 4 carries wastewater to Manhole 2 located north of the 1997 Pond. Pipeline 5 carries stormwater from the stormwater collection/transfer sump to Manhole No. 2. Pipelines No. 4a and No. 5a carry wastewater and stormwater from Manhole 2 to the 1997 Pond. The carrier pipelines pass through Manhole 2, keeping Manhole 2 dry and the water streams separate. A leak detection sensor and drip leg (4 total) is installed in each containment pipe of Pipelines No. 4, No. 4a, No. 5 and No. 5a at Manhole No. 2 to detect leakage from the carrier pipes. The sensors activate a strobe alarm mounted on a post adjacent to Manhole 2. In addition, a sight canister is installed on each drip leg to collect any water, for visual detection, that may flow from the drip leg.

**4.20.64.17.6 Stormwater Lift Sump Flow and Monitoring**

Stormwater is collected by the catchbasins located south of the Intermodal Container Wash Building, north and south of the Intermodal Unloading Facility, and between Tracks 2 and 3 and routed to the stormwater lift sump. The collected water is pumped from the sump and routed to the 1997 Pond through Pipeline No. 5.

A high water level float alarm is installed in the stormwater lift sump to indicate high water conditions within the sump due to system failure. The alarm activates a strobe alarm mounted to a post adjacent to the sump. If the high water level alarm is activated at the stormwater lift sump, ponding will occur at the catchbasins before water will overtop the stormwater lift sump.

The alarm is inspected during the second week of each month.

**4.20.7 Stormwater Drainage System Daily Inspections**

The East Side drainage system is inspected daily to ensure the free drainage of stormwater from the area south of the Intermodal Container Wash Building, the areas north and south of the Intermodal Unloading Facility and the area between Tracks No's 2 and 3 to the stormwater lift sump and the 1997 Pond. In addition, a daily inspection is performed for the activation of strobe alarms for indication of water within the carrier pipe of the dual wall pipelines at Manholes 1 and 2 and the gray water tank at the Decon Access Control Building. A daily inspection is also performed of the high water level alarm at the Lift Station. The results of the inspection are recorded on Attachment 1.

**4.20.8 Weekly Drip Leg Inspections**

The drip leg collection sight canisters located within Manholes 1 and 2 and the Decon Access Control Building gray water tank will be visually inspected weekly for the presence of water. The results of the inspection are recorded on Attachment 1.

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**4.20.9 Annual Pipe Pressure Testing**

All carrier pipes (Pipelines No. 1, No. 2, No. 3, No. 4, No. 4a, No. 5 and No. 5a) within the East Side Drainage System will be pressure tested annually during the third quarter of the calendar year to ensure integrity. The Time Pressure Drop method described in ASTM F1417 shall be used to determine the test criteria. In addition, the leak detection probes (8 total) will also be inspected and tested annually at the same time as the pipe pressure testing. The testing shall be conducted under the direction of a certified Professional Engineer qualified to perform pipe integrity testing. Notification of shut down of the system for testing purposes will be provided at least 48 hours prior to the Executive Secretary/Director. A written report including certified test results will be submitted as part of the Semi-annual BAT Monitoring Report maintained in the operating record.

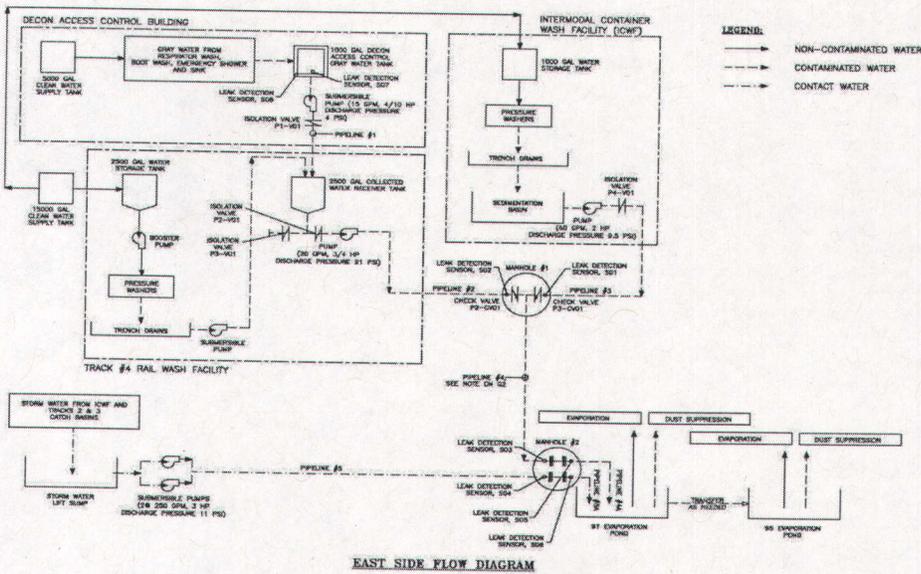


FIGURE 1 – EAST SIDE FLOW DIAGRAM



**4.17.1 Annual Pipe Pressure Testing**

4.21—All carrier pipes (Pipelines No. 1, No. 2, No. 3, No. 4, No. 4a, No. 5 and No. 5a) within the East Side Drainage System will be pressure tested annually during the third quarter of the calendar year to ensure integrity. The Time-Pressure Drop method described in ASTM F1417 shall be used to determine the test criteria. In addition, the leak detection probes (8 total) will also be inspected and tested annually at the same time as the pipe pressure testing. The testing shall be conducted under the direction of a certified Professional Engineer qualified to perform pipe integrity testing. Notification of shut down of the system for testing purposes will be provided at least 48 hours prior to the Director. A written report including test results will be maintained in the operating record.

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**4.18 South Ditch**

4.22 The Vitro drainage ditch culvert replacement (hereafter referred to as the South Ditch) was constructed to reduce a potential source of groundwater mounding near well GW-60. Since the ditch does not entirely free drain, the ditch contains a sump to lift remaining water from the ditch to the Southwest Corner Pond. The Southwest Corner Pond is a non-contact water collection and storage pond outside the restricted area and is not subject to the Ground Water Quality Discharge Permit. The pump may be removed from the sump during freezing weather. When the pump is removed, manual water removal will begin within the same working day after water is discovered to be above the sump grate.

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~~The Vitro drainage ditch culvert replacement (hereafter referred to as the South Ditch) was constructed to reduce a potential source of groundwater mounding near well GW-60. Since the ditch does not entirely free drain, the ditch contains a sump to lift remaining water from the ditch to the Southwest Corner Pond. The Southwest Corner Pond is a non-contact water collection and storage pond outside the restricted area and is not subject to the Ground Water Quality Discharge Permit. The pump will be removed from the sump during freezing weather. When the pump is removed, manual water removal will occur within the same working day after water is discovered to be above the sump grate.~~ The South Ditch will be inspected when storm water has accumulated on site. Storm water accumulation is recorded on Attachment I as a general inspection item. The strobos, pump, and sump grate will be inspected during the second week of each month. Results will be recorded on Attachment I.

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**4.234.19 LLRW Operations Building**

Wastewater from the restricted area of the LLRW Operations Building drains to a 2,500 gallon double-walled collection tank outside of the building. A moisture leak detection sensor is located at the bottom of the tank between the walls (annular space) of the tank to detect moisture or leakage from the primary wall of the tank. A strobe alarm is located

adjacent to the tank is activated by the sensor in the tank annular space. A high level float alarm (orange strobe) is set to indicate when the tank is three-quarters full (approximately 625 gallons remaining capacity). A high-high-level float alarm (red strobe) is set just below the maximum capacity of the tank (approximately 125 gallons remaining capacity). ~~The LLRW Operations Building visual alarms will be inspected daily for activation. Weekly inspections of the~~ The bootwash and sample prep room floor drains will be performed to ensure free drainage. These are the lowest elevation floor drains in the building, and therefore will provide the earliest indication if the tank is overfilled. Results will be recorded on Attachment 1. An annual inspection of the alarms (high level, high-high level, and moisture sensor) will be performed within the third quarter. A written report including test results will be submitted as part of the Semi-annual BAT Monitoring Report.

#### 4.244.20 *SRS DU Storage Building*

The SRS DU Storage Building is designed to protect SRS DU waste from the elements. The storage building is a steel building on concrete foundation with an asphalt floor. ~~The building will be inspected weekly to ensure that walls and roof are free from holes. The floor will be inspected for the presence of water. The containers will be inspected for evidence of leaks, corrosion, or deterioration. The results of the inspection are recorded on Attachment 6.~~

#### 4.254.21 *Evaporation Pond Ancillary Equipment to Facilitate Evaporation*

Ancillary equipment intended to facilitate evaporation at all Evaporation Ponds ~~is~~ will be constructed of UV resistant, PVC piping that is set a minimum of 2 feet from the top of berm. The inlet pipe is located over a rub sheet to protect the liner. Water is conveyed to the piping and fed back into the pond. ~~The ancillary equipment is inspected daily to ensure that the system is working as designed, no liner damage is present, and no spillage of water has occurred from within secondary containment.~~

24 hours prior to use of ancillary equipment at an approved evaporation pond, verbal or email notification will be provided to DRC in order to provide opportunity for inspection.

Any proposed change in a test design or construction of ancillary equipment at an evaporation pond must adhere to the following BAT principles:

- Equipment that conveys contact wastewater (such as pumps, pipe, hoses, etc.) and is not located directly on the pond liner shall be placed inside a watertight secondary containment system that drains into the pond.
- Equipment that is placed onto or over the pond liner shall be placed so that the integrity of the pond liner is protected; i.e., placed on rub sheets or otherwise arranged to minimize the potential for the pond liner to be damaged.
- Spillage of contact wastewater outside of the pond or secondary containment or damage to the pond liner shall be responded to in accordance with the BAT Contingency Plan.

4.264.22 **Stormwater Management**

The Clive facility is inspected daily for the accumulation of stormwater. Water management personnel collect and transfer stormwater from within the restricted area to the evaporation ponds. Collected stormwater and water contained within the evaporation ponds may also be used for minimal engineering and dust control purposes at the Class A and Class A North West embankments and for dust suppression activities at the Shredder Facility. The management of stormwater at the facility shall occur according to the following requirements:

Stormwater runoff at the Class A, ~~Class A North, West~~ and 11e.(2) Disposal Cells which has contacted the waste (i.e. contact stormwater), shall be contained. The priority schedule listed below shall be followed for removal of stormwater that falls inside the restricted area. This includes runoff from waste disposed in excavated, below grade areas of the Disposal Cells.

Within 24 hours of discovery of any accumulation of contact stormwater, removal of said wastewater shall commence. Wastewater removal shall occur in accordance with the priority list below.

- 1) Contact stormwater inside the footprint of the Class A, ~~Class A North, West~~ and 11e.(2) Disposal Cells
- 2) Contact stormwater at the Rail Rollover and Rotary Dump Facility
- 3) Contact stormwater at the ~~Intermodal Unloading Facility~~ IUF
- 4) Contact wastewater at any facility (e.g. BAT Failures, facility maintenance, etc.)
- 5) Non-contact stormwater within the restricted area

If water removal equipment is not effective for use at higher priority water accumulation areas, said equipment may be used at the next lower priority location where it will be effective provided that higher priority collection is not interrupted. This is defined as a bypass of priority collection (e.g., if water removal equipment cannot navigate the terrain in the embankments, it can be used to remove water from a priority two location, if necessary; or if a pump is not usable to transfer water at a priority one location and cannot be used at a priority two location, it can be used at the priority three location, or the next lower priority, where it will be effective).

If conditions improve so that water removal equipment can now access or be used at the previous higher priority inaccessible area, the water removal equipment will return to the high priority area immediately.

Within 24 hours the ~~Director of LLRW Operations~~ Manager, Compliance and Permitting or designee shall provide notification and justification to the ~~Executive Secretary~~ Director whenever equipment bypasses a higher priority for use at a lower priority location.

Approval must be obtained from the ~~Executive Secretary~~ Director to interrupt (stop) collection from a higher priority location for the purpose of collecting water from a lower priority location.

If stormwater removal at a lower priority location interrupts listed higher priority collection without required approvals, contingency actions shall be performed in accordance with the BAT Contingency Plan.

#### ~~5~~ EQUIPMENT MAINTENANCE

Equipment corrective and preventative maintenance is performed, as needed. Spare sump pumps and replacement parts (including batteries for portable measuring devices, etc.) are on site at all times for required repairs.

#### ~~6~~ QUALITY ASSURANCE/QUALITY CONTROL

The Quality Assurance Manager or designee will conduct surveillance activities to ensure the requirements of the BAT Performance Monitoring Plan have been implemented, as required. Surveillance activities will be performed in accordance with the currently approved Quality Assurance Program Document. The Quality Assurance Manager or designee will also ~~perform~~ reviews of inspection forms for accuracy and completeness.

The applicable site director ~~Manager, Waste Disposal Operations~~ or designee will conduct a ~~biweekly (once every two weeks)~~ monthly assessment of the ~~BAT Performance Monitoring Plan~~ daily and weekly inspections to ensure inspection activities are performed in accordance with this plan. ~~Biweekly~~ Assessments will be conducted in accordance with currently approved procedures. The applicable site director or designee will also perform reviews of inspection forms for accuracy and completeness.



**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
1995, 1997, 2000, Northwest, and Mixed Waste Evaporation Ponds	Visual monitoring of freeboard requirement of 24 inches. Freeboard between pond water level and spillway elevation, measured vertically	Daily inspection of freeboard compliance. Daily – visual inspection	Freeboard level maintained at a minimum of 24 inches.	Form 1 (Form 4 for MW Pond)
	Leak detection system including the following: leak detection system pump, head pressure transducer, and flow meters	Daily – Record water flow meter reading daily. Daily – Record fluid head reading from pressure transducer. Weekly – Calculation of seven-day average flow rate.	Not to exceed a seven-day average flow rate of 162 gallons/day. Pressure transducer < 1.0 foot. Flow rate initial action levels: 1995 Pond – 155 gal/day 1997 Pond – 160 gal/day 2000 Pond – 355 gal/day NW Pond – 300 gal/day MW Pond – 160 gal/day	Form 1 (Form 4 for MW Pond) Form 2
	Leak detection system spump	Measurement of fluid head using pressure transducer. Annual – inspection and maintenance of instrumentation.	Procedure CL-EN-PR-023, Annual Evaporation Pond Pump Inspection. Fluid head not to exceed a 1-foot level above the lowest point in the lower flexible membrane liner	Procedure CL-EN-PR-023, Form 1 Annual Report form CL-EN-PR-023 F1

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
	<u>Pump functionality and return piping from leak detection system to pond integrity</u>	Monthly – inspection of piping from leak detection system to pond through the manual removal of water.	<u>Pump operational; nNo leakage from piping designed to pump water from the leak detection system back to the pond</u>	Form 3
1995/1997 Pond Lift Station	<u>Water level within the lift station</u>	Daily – Inspect for visual alarm activation. Monthly – Confirm alarm function	<u>Water level not to exceed the lowest level of the inlet pipe (set point for alarm) Alarm trips manually</u>	Form 1 Form 3
2000 Evaporation Pond Water Transfer Pad	<u>Gravity flow from the pad to the collection sump.</u>	Daily when stormwater present – free drainage; sump water level Weekly – Surface integrity	<u>Free drainage; water below grate of sump See definition "Surface Integrity Discrepancy"</u>	Form 1a Form 2

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Pond Lift Station	Visual alarm to monitor water level within the lift station	Daily inspection for the activation of the visual alarm. Monthly alarm inspection.	Water level not to exceed the lowest level of the inlet pipe	Form 1 Form 3
2000 Evaporation Pond Water Transfer Pad, Containment Trough, Ramps, and Spillway	Gravity Flow system from the pad to the sump collection area.	Weekly (or daily when stormwater present). Daily inspection of drainage system, and concrete integrity.	Existence of free drainage conditions and maintenance of concrete integrity	Form 1a Form 2
Northwest Pond Transfer Facility	Concrete pad with HDPE Apron for the water transfer and collection of water at the pond.	Monthly – Surface integrity; inspection of pad apron for signs of cracks, tears, or holes. Monthly inspection of concrete pad to ensure integrity.	No holes, cracks, or tears at the seam between the concrete apron and HDPE liner. See definition "Surface Integrity Discrepancy" maintenance of concrete integrity.	Form 3
LARW Cell Collection Lysimeters	Annual video log; monitoring for the presence of fluids in accordance with Appendix C of the GWQDP.	Annual video log performed; semi-annual monitoring for free drainage and presence of fluid; if fluids are present they are measured and analyzed.	Completion of annual video log; existence of free drainage conditions	

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
East Truck Unloading Area and Container Holding Pads.	The Container Holding Pads, are inspected daily to ensure gravity flow to the collection troughs, ensure that water level in each trough does not exceed three quarters full, ensure that exposed container holding pad areas are free from dirt and debris, and ensure structural integrity of the exposed surfaces of the container holding pads, curbing, and troughs.	<u>When in use, w</u> Daily eekly (or daily if stormwater present) inspection to ensure free drainage to collection troughs from container holding pads; cleanliness of concrete surfaces (dirt, debris, etc.), and inspection of container holding pad surface integrity.	Free drainage to collection troughs from the container holding pads; water level within troughs less than 3/4 full; maintenance of container holding pad surface integrity.	<u>Form 1a</u> <u>Form 2</u>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rail Rollover Facility	Minimize stormwater contact with waste. Free drainage from the berm to the trough through the settling basin and into the sump; prevention of ponded water.	Daily when stormwater present – free drainage; sump water level Weekly – Surface integrity inspection Annual – Clean entire surface for detailed surface integrity inspection When in use, weekly (or daily if stormwater present) inspection of facility to ensure free drainage from the berm to the trough through the settling basin and into the sump; sump pump operation; no ponding of water within the covered area; cleaning of berm and trough, settling basin, and sump; annual inspection of asphalt surfaces, concrete berm, trough, and bay.	Free drainage; water below grate of sump See definition “Surface Integrity Discrepancy” Free drainage from the berm to the trough, through the settling basin and into the sump and sump pump operation; water level below grate; repair concrete and asphalt surfaces during annual inspection	Form 1a Form 2 Engineer’s report of annual inspection Form 1a Form 2

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Containerized Waste Storage Pad	Gravity flow system to provide drainage of water to the Pond Lift Station. Prevent stormwater from contacting waste	Daily when stormwater present – free drainage; sump water level Weekly – Surface integrity; container storage compliance When in use, w/Daily weekly (or daily if stormwater present) inspection of drainage system, physical condition of containers on pad, cleanliness of pad surface (dirt, debris, etc.), and pad integrity.	Free drainage; water below grate of sump See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance” Existence of free drainage conditions and proper condition of containers on pad and maintenance of pad integrity	Form 1a Form 2

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Intermodal Unloading Facility	Drainage system on the unloading pad to a sump and in the stormwater drainage pipeline system. Minimize stormwater contact with waste.	Daily when stormwater present – free drainage; sump water level Weekly – Surface integrity; container storage compliance Annual – Clean entire surface for detailed surface integrity inspection (see section 4.7) When in use, weekly (or daily if storm water present) Daily inspection of drainage to sump; level within sump; cleanliness of pad surface (dirt, debris, etc.), and pad integrity; annual inspection of concrete surfaces	Free drainage; water below grate of sump See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance” Free drainage to sump; level within sump; maintenance of pad integrity	Form 1a Form 2 Engineer’s report of annual inspection
Intermodal Unloading Facility IUF Lift Station	Contain contact water within facility. Free drainage of wastewater from the Intermodal Unloading Facility, Rail Wash Facility on Track No. 2, and Rail Rollover Facility; pumped to the pond lift station.	Daily – Inspect for visual alarm activation. Monthly – Alarm function When in use, weekly (or daily if storm water present). Daily inspection for activation of visual alarm; Monthly alarm inspection.	Water level not to exceed the lowest level of the inlet pipe (set point for alarm) Alarm trips manually Free drainage to Intermodal Unloading Facility Lift Station; level of water within lift station	Form 1 Form 3 Form 1a Form 2 Form 3

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
LARW Box Washing Facility	Free drainage at floor sumps and wastewater drainage pipeline that discharges to the concrete holding tanks; water level in concrete holding tanks not to exceed three-quarters full. <u>Contain contact water within facility</u>	Weekly – Sump water level; free drainage; surface integrity; pipeline cap; holding tank water level <u>When in use, weekly (or daily if storm water present) Daily inspection to ensure free drainage at floor sumps and wastewater drainage pipeline to the concrete holding tanks; sump operation; inspection of water level in the concrete holding tanks; cleanliness of pad surface (dirt, debris, etc.); and inspection of concrete integrity.</u>	Sump water level below grate; free drainage; see definition “Surface Integrity Discrepancy”; pipeline cap intact; tank water level < ¼ full Maintenance of concrete integrity; free drainage; water level in concrete holding tanks not to exceed three-quarters full	<u>Form 1a</u> <u>Form 2</u>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rail Wash Facility on Track No. 4	Contain contact water within facility. Free drainage at floor sumps and concrete trench that discharges to the collection tank(s) located within the adjacent equipment/mechanics building	Weekly – Sump water level; free drainage; surface integrity Monthly – Alarm function When in use, wDaily eekly inspection to ensure free drainage at floor sumps through piping and concrete trench; sump pump operation; inspection of collection and storage tanks; cleanliness of concrete surface (dirt, debris, etc.); and inspection of concrete integrity. When in use, mMonthly alarm inspection.	Sump water level below grate; free drainage; see definition “Surface Integrity Discrepancy” Maintenance of concrete integrity; free drainage to sump; maintenance of closed loop system Alarm trips manually	Form 2 Form 3

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rail Digging Facility	Minimize stormwater contact with waste <u>Free drainage to collection basins to digging facility manhole</u>	Daily when stormwater present – free drainage; sump water level <u>Weekly – Surface integrity</u> <u>When in use, weekly inspection to ensure free drainage to collection basins to digging facility manhole; cleanliness of asphalt and concrete surfaces (dirt, debris, etc.), and inspection of asphalt and concrete integrity.</u>	<u>Free drainage; water below grate of sump (4)</u> <u>See definition “Surface Integrity Discrepancy”</u> <u>Maintenance of asphalt and concrete integrity; free drainage to collection basins and digging facility manhole.</u>	<u>Form 1a</u> <u>Form 2</u>
East Truck Unloading Area and Container Holding Pads	<u>Prevent stormwater from contacting waste</u>	Daily when stormwater present – free drainage; collection trough water level <u>Weekly – Surface integrity; container storage compliance</u>	<u>Free drainage; water level ≤ ¼ full</u> <u>See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance”</u>	<u>Form 1a</u> <u>Form 2</u>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Decontamination Access Control Building	Contain contact water within facility; free drainage from the bootwash, respirator sink, shower, and the sink next to shower, to the wastewater collection tank buried outside the southwest corner of the building; leak detection system.	Weekly - When in use, monthly inspection to ensure free drainage to the wastewater collection tank; level of wastewater within the tank below the bottom of the inlet pipe; and presence of fluids in the leak detection system check. - When in use, monthly; Weekly inspection of sight gauges for presence of water. - When in use, monthly - Alarm inspection function.	Free drainage; water level not to exceed the lowest level of the inlet pipe (set point for alarm); no fluid in drip leg 7 Alarm trips manually; Maintenance of free drainage to the wastewater collection tank; maintenance of water level within the tank below the inlet pipe; absence of fluids within the leak detection system.	Form 2 Form 3

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Intermodal Container Wash Building	Contain contact water within facility; free drainage from the bootwashes, to the troughs; free drainage from the wash bays to the troughs through to the sediment basin; water level within sediment basin below the grate; leak detection system;	Weekly – Sediment basin water level; free drainage; surface integrity; leak detection system. When in use, daily weekly inspection of leak detection ports for presence of fluids; ensure free drainage from bootwashes to troughs; ensure free drainage from washbays to troughs through to the sediment basin; level of wastewater within the sediment basin below the grate; exposed concrete surface integrity.	Sump water level below grate; free drainage; see definition "Surface Integrity Discrepancy"; no fluids in leak detection system. Maintenance of free drainage from bootwashes to troughs, from washbays to troughs through to the sediment basin; maintenance of water level in sediment basin below the grate; absence of fluids within the leak detection system; concrete surface integrity.	Form 2 Form 2

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Shredder Facility	Minimize stormwater contact with waste	Daily when stormwater present – free drainage; sump water level Weekly – surface integrity Annual – Clean entire surface for detailed surface integrity inspection	Free drainage; water below grate of sump (7) <del>Maintenance of free drainage from shredder facility to catchbasins through to Manhole 1; ensure exposed concrete surface integrity</del>  Shredded material removed from the outfeed pad by the end of shift.  Repair of concrete surfaces of the facility and automatic valve functionality during annual inspection.  See definition “Surface Integrity Discrepancy”	Form 1a Form 2 Engineer’s report of annual inspection
Shredder Facility Alternate Wastewater Management System	Minimize stormwater contact with waste	Daily when in use – free drainage; pipeline integrity; high water level alarm; surface integrity Monthly – Alarm function	Free drainage; water below grate of sump (7); pipeline not leaking; high level alarm off; see definition “Surface Integrity Discrepancy” Alarm trips manually	Form 1b Form 3

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Shredder Facility	<p>Free drainage from the shredder facility to the seven catchbasins through to Manhole 1; drainage through valve to the Rotary Dump Facility-Sediment Basin; maintenance of concrete surface integrity.</p> <p>Shredded material removed from the outfeed pad at the end of shift.</p>	<p><u>When in use, w</u>Daily eckly inspection for free drainage of water to the catchbasins; level of water within the catchbasins below the grate; ensure free drainage from shredder facility to the manholes; and inspection of exposed concrete surface integrity;</p> <p>Additional inspection performed to ensure that shredded material is removed from the outfeed pad by the end of the shift.</p> <p>Annual inspection of concrete surfaces and automatic operation of the valve to the Rotary Dump Facility.</p>	<p>Maintenance of free drainage from shredder facility to catchbasins through to Manhole 1; ensure exposed concrete surface integrity</p> <p>Shredded material removed from the outfeed pad by the end of shift.</p> <p>Repair of concrete surfaces of the facility and automatic valve functionality during annual inspection.</p> <p>Maintenance of free drainage from shredder facility to Manhole 1; maintenance of pipeline integrity from Manhole 1 to the water storage tanks; maintenance of high water level within water storage tanks.</p>	<p><u>Form 2</u></p> <p><u>Annual Report</u></p> <p><u>Form 1b</u></p>
Alternate Wastewater Management System (Used for PCB Waste or optionally for other waste types)	<p>Free drainage from the shredder facility to the seven catchbasins through to Manhole 1; maintenance of pipeline integrity from Manhole 1 to water storage tanks; maintenance of high water level alarm within water storage tanks; maintenance of concrete surface integrity.</p>	<p><u>When processing PCBs,</u> Daily inspection for free drainage of water to the catchbasins; level of water within the catchbasins below the grate; ensure free drainage from shredder facility to the manholes; inspection of pipeline from Manhole 1 to the water storage tanks; inspection for activation of high water</p>	<p>Maintenance of free drainage from shredder facility to Manhole 1; ensure exposed concrete surface integrity</p> <p>Shredded material removed from the outfeed pad by the end of shift.</p> <p>Repair of concrete surfaces of the facility and automatic valve functionality during annual inspection.</p> <p>Maintenance of free drainage from shredder facility to Manhole 1; maintenance of pipeline integrity from Manhole 1 to the water storage tanks; maintenance of high water level within water storage tanks.</p>	<p><u>Form 2</u></p> <p><u>Annual Report</u></p> <p><u>Form 1b</u></p>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rotary Dump Facility – Thaw Building	Free drainage to rotary building floor; maintenance of concrete surface integrity. Contain contact water within facility	<del>When in use, weekly</del> Daily inspection for free drainage of water to the rotary building floor (no ponding of water on the granular floor surface, pipe outlet into rotary building free of debris; inspect exposed concrete surfaces to ensure integrity; performance of annual inspection. Weekly – free drainage (within Thaw Building and at discharge pipe); surface integrity	Free drainage; discharge pipe not blocked: see definition “Surface Integrity”  Maintenance of free drainage from thaw building to rotary building floor; ensure exposed concrete surface integrity	Form 2  Annual Report

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rotary Dump Facility  - Rotary Building	<u>Minimize stormwater contact with waste</u>  Free drainage to sediment basin; maintenance of water level within sediment basin below the grate; leak detection systems; maintenance of concrete surface integrity	<u>Daily when stormwater present – free drainage; sediment basin water level</u> <u>Weekly – surface integrity; leak detection system</u> <u>Annual – Clean entire surface for detailed surface integrity inspection (includes Thaw Building and Wash Building concrete surfaces)</u>  <u>When in use, weekly</u> Daily inspection for free drainage of water to the sediment basin; level of water within the sediment basin below the grate; inspect for the presence of fluids within the leak detection system ports at the sediment basin; inspect for the presence of water within the leak detection system for the pipeline from the Rotary Building to the Northwest Corner Evaporation Pond; inspect exposed concrete surfaces to ensure integrity; performance of annual inspection	<u>Free drainage; water below grate of sediment basin</u> <u>See definition “Surface Integrity Discrepancy”; no fluids in leak detection system</u>  Maintenance of free drainage from rotary building floor to sediment basin; maintenance of water level below the grate of the sediment basin; absence of fluids within the leak detection system ports at the sediment basin; absence of water within the leak detection system for the pipeline from the Rotary Building to the Northwest Corner Evaporation Pond;; maintenance of exposed concrete surface integrity	<u>Form 1a</u> <u>Form 2</u> <u>Engineer’s report of annual inspection</u>  <u>Form 2</u>  <u>Annual Report</u>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rotary Dump Facility	Contain contact water within facility	<u>Weekly – free drainage; surface integrity (including east curb and seals around stairway footing)</u>	<u>Free drainage; see definition “Surface Integrity</u>	<u>Form 2</u>
Wash Building	Free drainage from floor to trenches and from trenches to sediment tank; maintenance of water level below the collection trench grates	<u>When in use, weekly Daily inspection for free drainage of water to the trenches and from trenches to the sediment tank; level of water level within the trenches below the grates; inspect exposed concrete surfaces and surface seals around stairway footing to ensure integrity; performance of annual inspection (this includes curbing at east end of the building).</u>	Maintenance of free drainage from the wash building to the sediment tank; level of water level within the trenches below the grates; maintenance of exposed concrete surface integrity and surface seals around stairway footing	<u>Form 2</u> <u>Annual Report</u>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
Rotary Dump Facility = Alternate Wastewater Management Area (When in service with locked valve in the "Open" position)	<p><u>Contain contact water within facility</u></p> <p>High water level alarm activation at wastewater storage tanks; pipeline from sediment basin to wastewater storage tanks free from leaks; no ponding of water on the concrete surface</p>	<p><u>Weekly – free drainage; pipeline integrity; high water level alarm; surface integrity</u></p> <p><u>Monthly – Alarm function</u></p> <p><u>When in use, weekly</u> Daily inspection for leakage in the pipeline from sediment basin to wastewater storage tanks; activation of visual alarms at wastewater storage tanks; inspect concrete surface for ponding of water; inspect exposed concrete surfaces to ensure integrity. <u>When in use, m</u>Monthly alarm inspection; performance of annual inspection</p>	<p>Free drainage; pipeline not leaking; high level alarm off; see definition "Surface Integrity Discrepancy"</p> <p>Alarm trips manually</p> <p>Notification provided to Executive Secretary when placed in service; Maintenance of pipeline from the sediment basin to the wastewater storage tanks; water level within the tanks; maintenance of drainage from concrete surface to rotary building floor; maintenance of exposed concrete surface integrity</p>	<p>Form 1b Form 3</p> <p><u>Form 2</u> <u>Form 3</u></p>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
East Side Drainage System Stormwater Drainage	Contain contact water within system. Free drainage of stormwater from the catchbasins south of the Intermodal Container Wash Facility, north and south of the Intermodal Unloading Facility and between Tracks 2 and 3 to the 1997 Pond; maintenance of integrity of the dual walled pipe system. Pipelines 5 and 5a; maintenance of Lift Station.	Daily inspection of stormwater catchbasins for free drainage of stormwater; inspection for activation of visual alarms at Lift Station and Manhole 2. Weekly visual inspection for the presence of fluid within the drip leg sight canisters of Manhole 2. Monthly alarm inspection. Annual certification of carrier pipeline during third quarter. Daily – Manhole 1, 2, and stormwater lift station alarms. Weekly – Leak detection system check. Monthly – Alarm function. Annual – Pressure test.	Maintenance of free drainage of stormwater from catchbasins to the 1997 Pond; integrity of dual walled pipe system. Alarms off. No fluid in drip legs 1-2 (manhole 1) or 3-6 (manhole 2). Alarm trips manually. See section 4.17.7.	Form 1 Form 2 Form 3 Engineer's report of annual inspection. Annual Report.

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
East Side Drainage System Gray Water Drainage	Drainage of wastewater from the Rail Wash Facility on Track No. 4; Decontamination/Access Building, and Intermodal Container Wash Building; integrity of dual walled Pipelines 1, 2, and 3 to Manhole 1; integrity of dual walled Pipelines 4 and 4a from Manhole 1 to Manhole 2 to the 1997 Pond	Daily inspection for activation of visual alarms at Manholes 1 and 2. Weekly visual inspection for presence of fluid within the drip leg sight canisters of Manholes 1 and 2. Monthly alarm inspection. Annual certification of carrier pipelines and leak detection probes during the third quarter.	Maintenance of drainage of wastewater from the Rail Wash Facility on Track No. 4; Decontamination/Access Building, and Intermodal Container Wash Building; integrity of dual walled pipelines to the 1997 Pond and leak detection systems.	Form 1 Form 2 Form 3 Annual Report
South Ditch	Free drainage of non-contact storm water to the Southwest Corner Pond during higher flows of storm water runoff. Pump assisted drainage or manual removal after runoff has slowed or during lower volumes of runoff. Pump may be removed during freezing weather. Reduce a potential source of groundwater recharge via timely transfer of water to Southwest Corner Pond	Daily when stormwater present – pump operating Monthly – Alarm function Inspected, on days when there is storm water accumulation on site for activation of strobes indicating water accumulation and pump operation (except when the pump has been removed). Monthly co-inspection of strobes, pump, and debris that could impede drainage into the sump.	Maintenance of storm water drainage. Pump system removing water as designed or manual removal during freezing weather when pump has been removed. Pump operates while water in sump or manual removal Alarm trips manually	Form 1a Form 3

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
LLRW Operations Building	Contain contact water within facility. Waste water from the restricted area of the building gravity flows to the wastewater tank buried to the south side of the building. The collection tank is dual walled tank with a leak detection system.	<u>Daily – Alarm status</u> Weekly – Free drainage to the wastewater collection tank <u>Monthly – Alarm function</u> Daily inspection of the water level within the wastewater collection tank as indicated by condition of the high and high-high level alarms; presence of fluids in the leak detection system as indicated by the alarm; weekly inspection of bootwash and emergency shower in the sample prep room to ensure free drainage; and annual inspection of the high and high-high level alarms and the leak detection system sensor and alarm to verify function.	<u>Alarms off</u> Bootwash and sample prep room floor drains free drain <u>Alarm trips</u> manually Maintenance of water level within the wastewater collection tank below the inlet pipe, as indicated by the high-high level alarm; absence of fluids within the leak detection system, as indicated by the moisture sensor/alarm.	<u>Form 1</u> <u>Form 2</u> <u>Form 3</u> <del>Form 1</del> <del>Form 2</del> <u>Annual Report</u>

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**TABLE 1**  
BAT MONITORING AND PERFORMANCE CRITERIA

FACILITY	BAT DESCRIPTION	INSPECTION AND MAINTENANCE	PERFORMANCE CRITERIA	DOCUMENTATION
SRS DU Storage Building	Prevent stormwater from contacting waste. Building and Asphalt floor designed to contain leakage.	Weekly – Surface integrity; container storage compliance; check for presence of water. When in use, weekly inspection of the exposed floor integrity; walls and roof for presence of holes; presence of water within the building; and that containers show no evidence of leaks, corrosion, or deterioration.	See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance”; remove any water observed. Maintenance of building and floor surface to contain potential leakage and protect containers from the elements.	Form 2 <del>Form 2</del>
Evaporation Pond Arcillary Equipment to Facilitate Evaporation	Equipment conveying contact wastewater (such as pumps, pipe, hoses, etc.) into the pond. Contain contact water within the pond	Daily inspection of the equipment to ensure that pond liner integrity is maintained (i.e. hoses on rub sheets, etc.); and no spillage outside of secondary contained areas. Daily – pond liner integrity; system containment	Maintenance of pond liner integrity and prevention of spillage outside of pond or secondary containment.	Form 1

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# LLRW/11e.(2) DAILY FACILITY INSPECTION – Form 1

**Y N**

Date/Time of Inspection: \_\_\_\_\_

<input type="checkbox"/>	<input type="checkbox"/>	STORMWATER? (Attachment 1a)
<input type="checkbox"/>	<input type="checkbox"/>	MANAGING PCBs ? (Attachment 1b)

Printed Name of Inspector: \_\_\_\_\_

Signature of Inspector: \_\_\_\_\_

<input type="checkbox"/>	<input type="checkbox"/>	ANY NOTIFICATIONS?
--------------------------	--------------------------	--------------------

Manager Notified (if yes): \_\_\_\_\_

## EVAPORATION PONDS

### METERS AND FLUID HEAD

Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Leak Detection Meter Reading				
Previous Reading				
Difference				
Allowable Difference	155	160	355	300
Process Controller Display Value				

If the leak detection difference is over the allowable limit or the display value is greater than 1.0 Notify Manager

### FREEBOARD

Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Indicate freeboard level				
Freeboard levels at three foot marking	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
Freeboard levels less than 24"	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>

If "Yes" is checked on any item above Notify Manager

### ANCILLARY EQUIPMENT CHECK

Inspection Item	1995 Pond	1997 Pond	2000 Pond	NWC Pond
Is pond liner integrity maintained during ancillary equipment use (if not in use mark "N/A")	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>	N/A <input type="checkbox"/>

If "No" is checked on any item above Notify Manager

<b>Pnd Lift</b>	Is the Visual Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>East side Drainage</b>	Catch-basins clear for free drainage of water?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Lift Station Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Manhole 1 Strobe Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Manhole 2 Strobe Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>LLRW Ops</b>	Is the high level water alarm (orange) activated at the wastewater storage tank?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the high-high level water alarm (red) activated at the wastewater storage tank?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the leak detection alarm activated at the wastewater storage tank?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>U/F</b>	Is the Visual Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>

**COMMENTS:**


Manager Approval: _____	Q/A Review _____
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**LLRW/11e.(2) DAILY STORMWATER INSPECTION – Form 1a (page 2)**

Date of Inspection: \_\_\_\_\_

**Stormwater Collection Worksheet**

<b>Name:</b>			CL-LD-PR-704 F1, Rev 2	<b>Truck #</b>	
Load	Time Loaded	Area (Use table below)	Unique Location	Qty (Gallons)	Disposal Location
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

<b>List names of personnel working on the rig:</b>	<b>Daily Completion Time:</b>

**Comments**

Contact Water Areas	Non-Contact Water Areas
1--Class A Embankment (Priority 1)	6--Vitro Boundary (Priority 3)
2--Class A North Embankment (Priority 1)	7--Northwest Operations Area (Priority 3)
3--11e.(2) Embankment (Priority 1)	8--LLRW Operations (Priority 3)
4--Rollover Facility (Priority 2)	9--East Side Operations (Priority 3)
5--Intermodal Unloading Facility (Priority 2)	10--Other (Priority 3)

<b>Driver Signature:</b>	<b>Date:</b>
<b>Manager Signature:</b>	<b>Date:</b>





# LLRW/11e.(2) WEEKLY FACILITY INSPECTION – Form 2

Date/Time of Inspection: \_\_\_\_\_

Date of Next Inspection: \_\_\_\_\_

Printed Name of Inspector: \_\_\_\_\_

Signature of Inspector: \_\_\_\_\_

**Y** **N**

**ANY NOTIFICATIONS?** Manager Notified (if yes): \_\_\_\_\_

<b>1995 Pond</b>	Calculation of seven-day average flow rate _____	Test above 155 gal/day Max rate of 162 gal/day	Notify Manager <input type="checkbox"/>
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<b>1997 Pond</b>	Calculation of seven-day average flow rate _____	Test above 160 gal/day Max rate of 171 gal/day	Notify Manager <input type="checkbox"/>
------------------	--	---	---

<b>2000 Pond</b>	Calculation of seven-day average flow rate _____	Test above 355 gal/day Max rate of 382 gal/day	Notify Manager <input type="checkbox"/>
------------------	--	---	---

<b>NW C Pond</b>	Calculation of seven-day average flow rate _____	Test above 300 gal/day Max rate of 326 gal/day	Notify Manager <input type="checkbox"/>
------------------	--	---	---

<b>SRS DU</b>	Do containers show evidence of leaks, corrosion, or deterioration?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is there ponded water on within the building?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Are the containers properly sealed?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are the defects in the exposed floor integrity or grade?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>

<b>East Side Drainage</b>	Are there fluids within the drip legs 1 and 2 sight canisters of manhole 1?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Are there fluids within the drip legs 3 through 6 sight canisters of manholes 2?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>

<b>LLRW Ops</b>	Is there free drainage from the bootwash and emergency shower?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
-----------------	--	------------------------------	---

<b>2000 Pond Transfer Pad</b>	Pad clear for free drainage of water to sump?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the level of water below the grate?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Any integrity defects on exposed concrete?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>

<b>Rail Rollover</b>	Is ponded water present within the covered area?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the sump pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there free drainage from berm to trough, through settling basin, to sump?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>

<b>CW Storage Pad</b>	Pad free of soil, debris, etc?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Any integrity defects on exposed asphalt?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the sump operational and water level below the grate?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are containers closed, labeled, and on site < 365 days?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there free drainage from pad to sump?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>

<b>IUF</b>	Is the lift Visual Alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the facility free draining to Sump?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the sump's water level below the grate?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there defects in the exposed concrete integrity?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the pad free of soil, debris, etc?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>

<b>Decon Access</b>	Are building drains in free drainage condition?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the tank alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the drop leg sight canister dry?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>Box Wash</b>	Is the sump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there free drainage to the sump?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the pad free of soil and debris?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there any integrity defects on exposed concrete?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the pipeline cap from the building intact?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the holding tank water level at or below three quarters full?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>Track 4 Rail Wash</b>	Is the sump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there free drainage to the sump?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the pad free of soil and debris?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there any integrity defects on exposed concrete?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the gray water discharge pump functional?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the Tank Level Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>Rail Digging Facility</b>	Is there free drainage to the collection basin?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the collection basin water level below the grate?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the settling basin water level below the outlet pipe?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there leakage at the digging facility manhole?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the pad free of soil and debris?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there any integrity defects in the exposed surface?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>Intermodal Container Wash</b>	Are the leak detection systems in Ports 1 and 2 free of fluid?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there free drainage from wash bay through troughs to the basin?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the level of water within the basin sump below the weir gate?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there free drainage from the boot washes to troughs?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are the pad and concrete surfaces free of soil and debris?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there any integrity defects in the exposed surface?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>Rotary Buildings</b>	Is water free draining in the Thaw Building to floor?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the drainpipe from Thaw Building free from waste material?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the drainpipe from Thaw Building free from waste material?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Any integrity defects on exposed concrete of the Thaw Building?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is water free drainage in the rotary building to sediment basin?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there integrity defects on exposed concrete in the rotary building?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the Leak Detection System Port 1 and 2 free of fluid?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the Leak Detection System pipeline to the NWCP free of fluid?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the rotary sump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is water free drainage from the Wash Building to sediment basin?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there integrity defects on exposed concrete in the wash building?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the Wash Building sump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is there pipeline leakage at the alternate wastewater tanks?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the high level alarm activated at the alternate wastewater tanks?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is there free drainage of the alternate wastewater tank concrete pad?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are there integrity defects on the exposed concrete pad surfaces of the alt. wastewater tanks?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>





# LLRW/11e.(2) MONTHLY FACILITY INSPECTION – Form 3

Date of Inspection: \_\_\_\_\_

Date of Next Inspector: \_\_\_\_\_

Printed Name of Inspector: \_\_\_\_\_

Signature of Inspector: \_\_\_\_\_

Y N

ANY NOTIFICATIONS? Manager Notified (if yes): \_\_\_\_\_

1995 Pond	Is there leakage from the piping of the leak detection system to the pond?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
1997 Pond	Is there leakage from the piping of the leak detection system to the pond?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
Pond Lift	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
2000 Pond	Is the pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
NWC Pond	Are the signs of cracks, tears, or holes in the pad apron?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Are the defects in the exposed concrete surfaces	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
NWC Transfer	Are there cracks, tears, or holes in the pad apron?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Are the integrity defects on the concrete pad?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
IM Lift	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
T 4 Wash	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
Rot Dump	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
East Side Drainage	Does manhole 1 alarm function properly?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Does manhole 2 alarm function properly?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Does the lift station alarm function properly?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
Decn Acs	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
Shdr	Is the tank alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
Lift Str	Is the storm water alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>



Permit No. UGW450005

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Hanging: 0.53", Tab stops: 0.83", Left +  
5.99", Right, Leader: ...

APPENDIX K

# Groundwater Quality Discharge Permit BAT Contingency Plan

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## 1 INTRODUCTION

EnergySolutions, LLC (EnergySolutions) has been granted a Groundwater Quality Discharge Permit, (GWQDP) Permit No. UGW450005 hereinafter called the Permit by the State of Utah. The Permit specifies the construction, operation, and monitoring requirements for all facilities at the Clive site that have a potential of discharging pollutants that may move directly or indirectly into groundwater. To cause the maximum reduction of pollutants achievable, the Permit specifies that "Best Available Technology" (BAT) be used in the construction of all facilities and that facilities be operated according to "Best Management Practices". To demonstrate compliance with BAT requirements and performance standards, EnergySolutions shall implement a BAT Performance Monitoring Plan in accordance with the Permit. In the event of a BAT failure at any facility, the following Contingency Plan will be implemented.

This Contingency Plan provides direction to EnergySolutions personnel as to contingency actions required for maintaining or regaining compliance with the GWQDP BAT requirements. The timely execution of contingency and corrective actions outlined in this Contingency Plan will provide EnergySolutions with the basis to exercise the Affirmative Defense provision in the Permit and thereby avoid noncompliance status and potential enforcement action.

## 2 DEFINITIONS

**Contingency Action:**

Actions performed to eliminate an existing threat or potential threat to human health and/or the environment and regain compliance with BAT as defined in the Permit.

**Corrective Action:**

Actions required for regaining or maintaining compliance with all licenses and permits.

**Discharge:**

The release of a pollutant directly or indirectly into subsurface waters of the state.

**Best Available Technology:**

The application of design, equipment, work practice, operation standard, or combination thereof, at a facility to effect the maximum reduction of a pollutant achievable by available processes and methods taking into account energy, public health, environmental and economic impacts and other costs.

**Contingency Plan:**

A plan for regaining and maintaining compliance with the permit limits and for reestablishing best available technology as defined in the Permit.

**Discrepancy in Pad Integrity:**

Either: 1) a crack in the asphalt or concrete with greater than 1/8 inch separation (width) or 2) any significant deterioration or damage of the pad surface.

**3 RESPONSIBILITIES**

Responsibilities are provided in the BAT Performance Monitoring Plan.

The **Director of Mixed Waste Operations and Director of LLRW Operations** (or designees) are responsible for maintaining assigned facilities in compliance with BAT requirements of the Clive site at all times. The applicable site director (or designee) shall immediately notify the QAM when any BAT Failure occurs.

The **Quality Assurance Manager (QAM)** or designee is responsible for providing verbal notifications required under the GWQDP, and the performance of surveillance and/or audit activities to verify implementation and compliance with the requirements of this plan. The QAM may provide verbal notification to the regulatory agencies, and will also review corrective actions proposed to ensure compliance with all licenses and permits.

The **Director of Compliance and Permitting** or designee in cooperation with the Corporate Radiation Safety Officer or designee is responsible for the determination of sample analytical priorities from fluid collected at collection lysimeters and providing verbal and written notification of any non-compliance for the Clive Facility.

The **Director of Health Physics (DHP)** or designee in cooperation with the Director of Compliance and Permitting or designee is responsible for the determination of sample analytical priorities from fluid collected at collection lysimeters.

The **Document Control Manager** or designee is responsible for filing all associated documentation of this plan in the site operating record.

The **Director of Engineering** or designee is responsible for conducting the pump down test for the leak detection system of the Evaporation Ponds if necessary and conducting all corrective actions regarding pond systems.

The **BAT Inspector** or designee is responsible for performing routine daily inspections and providing notification to the Applicable Site Director or designee of any non-compliance.

The **Facility Operator** is responsible for maintaining BAT compliance at all times and providing notification to the Applicable Site Director or designee of any non-compliance. The responsibilities listed for this position include Facility Operators performing operations at the Mixed Waste Facility.

The **Maintenance Manager** or designee is responsible for performing preventative maintenance on facility equipment in accordance to the manufacturer specifications and

guidelines, and ensuring that spare sump pump and replacement parts (including batteries for portable measuring devices, etc.) are on site at all times for required repairs.

#### 4 CONTINGENCY PLAN

EnergySolutions is responsible for implementing the contingency plan for any identified failure of BAT in accordance with the BAT Performance Monitoring Plan. The contingency actions required for failures of BAT are listed below by facility.

##### 4.1 All Evaporation Ponds:

###### 4.1.1 Evaporation Pond Freeboard Level at Three Feet

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.

###### 4.1.2 Evaporation Pond Freeboard Exceedance:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~.
2. The Manager, Waste Disposal Operations will immediately direct the removal of water from the pond via pumping until the minimum freeboard level is obtained, if approved water storage capacity is available. Water from the evaporation pond with a freeboard exceedance may be stored in another approved evaporation pond.
- ~~3.~~ The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
- ~~4.~~ The QAM or the Director of ~~Manager, Compliance and Permitting~~ ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
- ~~5.~~ The Director of ~~Manager, Compliance and Permitting~~ ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.
- ~~6.~~ The Applicable Site Director or designee will immediately authorize and direct the removal of water from the pond via pumping until the minimum freeboard level is obtained. Water from the evaporation pond with a freeboard exceedance may be stored in another approved evaporation pond.

###### 4.1.3 Leakage of Pipeline from Leak Detection System to Evaporation Pond

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The pipeline will be repaired.

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4. If the pipeline cannot be repaired ~~or repaired~~ within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
5. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.1.4 Average Leakage Rate at Initial Action Level:

The initial action levels for each pond are listed below:

Evaporation Pond	Initial Action Level for Average Leakage Rate (in gallons)
1995 Evaporation Pond	155
1997 Evaporation Pond	160
2000 Evaporation Pond	355
Northwest Corner Evaporation Pond	300
Mixed Waste Evaporation Pond	160

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the ~~Director of~~ Engineering ~~or designee~~ Manager, Engineering and Maintenance.
4. Within five days the Manager, Engineering and Maintenance ~~Engineering Department~~ will perform a pump down test to determine the accuracy of the flow meter.
  - a. The pump down test will entail the collection of water into a container with a known capacity as it is discharged from the Leak Detection System pump pipeline.
  - b. The water in the container will be measured and compared with the Leak Detection System meter to determine the system accuracy.
  - c. A report will be prepared by the ~~Director of~~ Engineering ~~or designee~~ and submitted to the DRC presenting the accuracy of the pump system.

4.1.5 Average Leakage Rate Exceedance :

The allowable average leakage rate for each pond is listed below:

Evaporation Pond	Allowable Average Leakage Rate (in gallons)
1995 Evaporation Pond	162
1997 Evaporation Pond	171
2000 Evaporation Pond	382

Northwest Corner Evaporation Pond	326
Mixed Waste Evaporation Pond	171

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~.
  2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
  3. The QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
  4. The Director of Manager, Compliance and Permitting~~or designee~~ will provide written notification and a proposed corrective action plan and schedule to the DRC within seven calendar days of discovery.
  - ~~5. EnergySolutions shall secure a corrective action schedule from the Executive Secretary to execute the appropriate contingency actions.~~
  - ~~6.5.~~ A calculation from the monitored leakage rate will be evaluated by the engineering department Manager, Engineering and Maintenance~~to determine the probable size and location of the leak(s). This calculation will assess if the defect can be identified by performing a visual inspection.~~
    - a. If the defect can be identified by visual inspection, the water level will be reduced to a level designated by the Director of Engineering Manager, Engineering and Maintenance~~to bring the average leakage volume below the allowable rate. Water may be placed in an approved evaporation pond.~~
    - b. If the leak(s) are determined too small for visual inspection, a leak location survey will be performed. EnergySolutions will include a Leak Survey Report with the HDPE Liner Repair Report detailing how the survey was conducted and provide the survey results, including the number and location of all leaks.
  - ~~7.6.~~ Defects in the liner will be repaired in accordance with the corrective action plan and schedule.
  - ~~8.7.~~ EnergySolutions shall submit for DRC approval an HDPE Liner Repair Report certified by a Utah Licensed Professional Engineer certifying all liner repair and testing procedures and quality assurance activities and documentation were performed in accordance with the corrective action plan and schedule. The report shall also include an estimate of the total volume of liquids released from the pond to the subsurface.
- 4.1.6 Fluid Head Level Exceedance (1 Foot Level Above the Lowest Point in the Lower Flexible Membrane Liner):
1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
  2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.

3. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
4. The pump and process controller will be checked for proper activation within 24 hours and adjusted or replaced if necessary.
- 4.5. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.
5. ~~The pump and process controller will be checked for proper activation and adjusted or replaced within 24 hours if necessary.~~

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#### 4.2 1995/1997 Evaporation Pond Lift Station:

##### 4.2.1 Water Level Above the Lowest Level of the Inlet Pipe (Visual Alarm Activated):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately.
2. The IUF, Rail Wash Facility on Track No. 2, Containerized Waste Storage Pad, Rail Digging Facility, and Rail Rollover Facility will be placed out of service.
3. The sump will be inspected to see if functioning properly.
4. If the sump pump requires repair or replacement it will occur within the same working day.
5. An inspection of the drainage system will occur to determine if blockage is present.
6. If blockage is present it will be removed to restore free drainage.
7. When free drainage is restored, the facilities may be placed back in service.
8. If blockage cannot be removed or is not removed within the same working day, the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will provide notification to the ~~Director of~~ Manager, Compliance and Permitting and the QAM or designee.
9. The QAM or ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
10. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

#### 4.3 2000 Evaporation Pond Water Transfer Pad

##### 4.3.1 Lack of Free Drainage:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. Water management activities at the transfer pad will cease.
4. An inspection of the drainage system will occur to determine if blockage is present.

5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, water management activities may resume.
7. If free drainage is not restored within the same working day, the Manager, Waste Disposal Operations ~~Applicable Site Director~~ will notify the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designees.
8. The ~~Director of~~ Manager, Compliance and Permitting or QAM or designee will provide verbal notification to the DRC within 24 hours of identification.
9. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

#### 4.3.2 Water Level in Sump Above Grate

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. Water management activities at the 2000 Evaporation Pond will cease.
4. Water will be removed from the sump.
5. When water is removed from the sump, water management activities may resume.
6. If water is not removed within the same working day, the Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee.
7. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting.
8. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
9. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

#### 4.3.3 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or designee will notify the QAM and the ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The Facility Operator or BAT Inspector will cease water management activities at the transfer pad.
4. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director~~ will provide the ~~Director of~~ Manager, Compliance

- and Permitting or designee will submit just cause for submittal in writing to the Executive Secretary Director.
6. Upon completion of repairs, water management activities may resume.
  7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
  8. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

#### 4.4 Northwest Corner Evaporation Pond Transfer Facility:

##### 4.4.1 Tear, gap, or hole found between concrete apron and HDPE liner:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and the Director of Manager, Compliance and Permitting or designees.
3. The Facility Operator or BAT Inspector will cease water management activities at the transfer facility.
4. The Manager, Waste Disposal Operations Applicable Site Director will schedule repairs to the exposed pad within 7 days after receiving notification.
5. Repairs will be completed within 30 working days of discovery or the Applicable Site Director will provide the Director of Manager, Compliance and Permitting or designee will submit just cause for submittal in writing to the Executive Secretary Director.
6. Upon completion of repairs, water management activities may resume.
7. If repairs are not performed within 30 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

##### 4.4.2 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and the Director of Manager, Compliance and Permitting or designees.

3. The Facility Operator or BAT Inspector will cease water management activities at the transfer facility.
4. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director will schedule repairs to the pad within 7 days after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director~~ will provide the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will submit just cause for submittal in writing to the ~~Executive Secretary~~ Director.
6. Upon completion of repairs, water management activities may resume.
7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

#### ~~4.5 LARW, Class A, and Class A North Cell Collection Lysimeters:~~

##### ~~4.5.1 Free Liquid is Greater Than 12 Inches Below the Intersection of the Transfer Pipe:~~

- ~~1. Free liquid present will be purged for sampling~~
- ~~2. Analytical Parameters to be tested will be prioritized by the CRSO, Director of Compliance and Permitting, and the Staff Hydrogeologist. Parameters chosen are dependent on the volume of liquid in the lysimeter taking into account the priority list provided in Appendix C of the GWQDP.~~
- ~~3. Analytical results will be reviewed and submitted to the DRC within 14 calendar days of receipt.~~

##### ~~4.5.2 Free Liquid Less Than 12 Inches Below the Intersection of the Transfer Pipe:~~

- ~~1. The Site Hydrogeologist or designee will notify the Director of Compliance and Permitting, Applicable Site Director or designee, and QAM.~~
- ~~2. The QAM or the Director of Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.~~
- ~~3. The Director of Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.~~
- ~~4. Free liquid will be purged for sampling.~~
- ~~5. Analytical Parameters to be tested will be prioritized by the CRSO, Director of Compliance and Permitting, and the Staff Hydrogeologist. Parameters chosen are dependent on the volume of liquid in the lysimeter taking into account the priority list provided in Appendix C of the GWQDP.~~
- ~~6. Analytical results will be reviewed and submitted to the DRC within 14 calendar days of receipt.~~

**4.6.4.5 Rail Rollover Facility:****4.6.14.5.1 Lack of Free Drainage from the Berm, Through the Trough, to the Settling Basin, and Continuing to the Sump:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and the ~~Director of~~Manager, Compliance and Permitting ~~or designees~~.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).
4. An inspection of the drainage system (berm, trough, settling basin to sump) will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, waste management activities may resume at the facility.
7. If free drainage is not restored within the same working day, the QAM or the ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.6.24.5.2 Water Level in Sump Above Grate:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and the ~~Director of~~Manager, Compliance and Permitting ~~or designees~~.
3. Waste management activities will cease (waste may be removed from the facility).
4. The sump pump will be inspected to see if functioning properly.
5. If the sump pump requires repair, replacement, or blockage removal it will occur within the same working day.
6. When sump pump has been repaired, etc., waste management activities may resume at the facility.
7. If the sump pump is not repaired, replaced, or blockage removed within the same working day, the Facility Operator or BAT Inspector will notify the ~~Applicable Site Director or designee~~. The QAM or the ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.6.34.5.3 Ponded Water Within the Covered Area of the Facility**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. Waste Management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).
4. Removal of water shall occur in accordance with priorities as listed in Part I.E.7.(c) of the Permit

**4.74.6 Containerized Waste Storage Pad:****4.7.14.6.1 Water Above the Sump Grate:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Radioactive Material License).
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, waste management activities may resume at the facility.
7. If free drainage is not restored within the same working day, the QAM or the ~~Director of~~Manager, Compliance and Permitting~~or designees~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.7.24.6.2 Discrepancy in Exposed Storage Pad Integrity:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the major discrepancy.

4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings.
5. No storage will occur in the marked area until repairs are complete.
6. The ~~Manager, Waste Disposal Operations~~ ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
7. Repairs will be completed within 10 working days of discovery or the ~~Director of~~ ~~Manager, Compliance and Permitting~~ will provide just cause in writing to the ~~Executive Secretary~~ ~~Director~~.
8. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ ~~Director~~, the QAM or the ~~Director of~~ ~~Manager, Compliance and Permitting~~ or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
9. The ~~Director of~~ ~~Manager, Compliance and Permitting~~ or ~~designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.7.34.6.3 Improper Labeling or Storage of Waste:

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

4.8.4.7 East Truck Unloading Area:

4.8.14.7.1 Troughs More Than Three Quarters Full:

1. The Facility Operator or BAT Inspector will notify the ~~Manager, Waste Disposal Operations~~ ~~Applicable Site Director or designee~~.
2. The ~~Manager, Waste Disposal Operations~~ ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ ~~Manager, Compliance and Permitting~~ or ~~designees~~.
3. Waste Management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the ~~Permittee's~~ Radioactive Material License).
4. If blockage is present it will be removed to restore drainage.
5. When free drainage is restored, waste management activities may resume at the facility.
6. If free drainage is not restored within the same working day, the QAM or the ~~Director of~~ ~~Manager, Compliance and Permitting~~ or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~ ~~Manager, Compliance and Permitting~~ or ~~designee~~ will provide notification to the DRC within seven calendar days of discovery.

4.8.24.7.2 Discrepancy in Exposed Surface Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the discrepancy.
4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings.
5. No waste management will occur in the marked area until repairs are complete.
6. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will schedule repairs to the exposed surface within 48 hours after receiving notification.
7. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
8. ~~The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary~~Director.
9. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~Director, the QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that repairs were not performed.
10. ~~The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.~~

4.8.34.7.3 Containers Without Current Date on Bates Label on Asphalt Surfaces:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Permittee's Radioactive Material License).
4. The container(s) will be removed from the asphalt surface
5. When the container(s) have been removed, waste management activities may resume at the facility.
6. The QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The Director of Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.8.44.7.4 Improper Labeling or Storage of Waste on Concrete Holding Pads:

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

4.9.14.8 Intermodal Unloading Facility:

4.9.14.8.1 Water Above the Sump Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. Waste management activities at the facility will cease (waste may be removed from the facility in order to maintain compliance with the Permittee's Radioactive Material License).
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, waste management activities may resume at the facility.
7. If free drainage is not restored within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.9.24.8.2 Discrepancy in Exposed Pad Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~.
3. The Facility Operator or BAT Inspector will arrange for the removal of items stored within the area of the major discrepancy.
4. The Facility Operator or BAT Inspector will mark the area with a sign or painted markings.
5. No storage will occur in the marked area until repairs are complete.
6. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
7. ~~Repairs will be completed within 10 working days of discovery or the~~ Applicable Site Director or designee ~~will provide just cause in writing to the Director of Compliance and Permitting.~~

~~8.7.~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director.

~~9.8.~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.

~~10.9.~~ The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.9.34.8.3~~ Improper Labeling or Storage of Waste:

1. The Facility Operator or BAT Inspector will rectify and document within the same working day.

~~4.104.9~~ Intermodal Unloading Facility Lift Station

~~4.10.14.9.1~~ Water Level Above the Lowest Level of the Inlet Pipe (Visual Alarm Activated):

1. The Facility Operator or BAT Inspector will notify the ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee immediately.
2. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~.
3. The IUF, Rail Wash Facility on Track No. 2, Rail Digging Facility and Rail Rollover Facility will be placed out of service.
4. The sump will be inspected to see if functioning properly.
5. If the sump pump requires repair or replacement it will occur within the same working day.
6. An inspection of the drainage system will occur to determine if blockage is present.
7. If blockage is present it will be removed to restore free drainage.
8. When free drainage is restored, the facilities may be placed back in service.
9. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
10. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

~~4.114.10~~ LARW Box Washing Facility:

4.11.14.10.1 Lack of Free Drainage to the Sump Continuing to the Concrete Holding Tanks:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. The facility will be placed out of service.
4. The drainage system will be inspected for blockage.
5. The sump pump will be inspected to see if functioning properly.
6. If the sump pump requires repair or replacement it will occur within the same working day.
7. If blockage is present within the drainage system, it will be removed within the same working day.
8. When drainage is restored via blockage removal or sump pump repair, the facility may be placed back in service.
9. If blockage cannot be removed or is not removed within the same working day, the QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
10. The Director of Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.11.24.10.2 Pipeline Cap from the Building Not Intact:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. The facility will be placed out of service.
4. Water will be removed from the sump.
5. Evaluate whether there has been a discharge from the facility. If so, implement the Emergency Response Plan.
6. The cap will be replaced.
7. When cap is replaced, the facility may be placed back in service.
8. If cap cannot be replaced within the same working day, the QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
9. The Director of Manager, Compliance and Permitting~~or designees~~ will provide written notification to the DRC within seven calendar days of discovery.

4.11.34.10.3 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
3. The Applicable Site Director or designee ~~y~~ will schedule repairs within 48 hours after receiving notification.
4. ~~Repairs will be completed within 10 working days of discovery or the~~ Applicable Site Director or designee ~~will provide just cause to the Director of Compliance and Permitting.~~
5. ~~The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary~~ Director.
6. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~ Director, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. ~~The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.~~

4.11.44.10.4 Water Level in the Holding Tanks Greater Than Three Quarters (3/4) Full:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.
4. The water will be removed
5. Upon completion of water removal, the facility may be placed back in service.
6. If water cannot be removed, or is not removed within the same working day, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.124.11 Rail Wash Facility on Track No. 4:****4.12.14.11.1 Lack of Free Drainage to the Wash Bay Sump Pump Continuing to the Collection Tank(s) Within the Adjacent Equipment/Mechanics Building:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~applicable site director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.
4. The sump pump will be inspected to see if functioning properly.
5. If the sump pump requires repair or replacement it will occur within the same working day.
6. An inspection of the drainage system, including the concrete trench in the rail wash building will occur to determine if blockage is present.
7. If blockage is present it will be removed to restore free drainage.
8. When free drainage is restored, the facility may be placed back in service.
9. If blockage cannot be removed or is not removed within same working day, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
10. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.12.24.11.2 Failure of Gray Water Transfer System from the Collection Tank(s) to the 1997 Pond:**

1. The Facility Operator or BAT inspector will ~~N~~otify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Compliance and Permitting ~~or designees~~.
3. Place the facility out of service.
4. Inspect the gray water transfer system (pump and piping) to see if it is operating correctly.
5. Perform repairs or replacement of the pump if necessary within the same working day.
6. Inspect the piping system, including Manholes 1 and 2 if needed to identify damage or leakage.
7. If the gray water transfer system cannot be repaired within same working day, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.12.34.11.3 Discrepancy in Exposed Pad Integrity:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
5. ~~4. The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary Director.~~
6. ~~5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.~~
7. ~~6. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.~~

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#### 4.13.4.12 Rail Digging Facility:

##### 4.13.4.12.1 Lack of Free Drainage of Water to the Collection Basins to the Sediment Basin:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. The facility will be placed out of service.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The Director of Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.13.24.12.2 Water Level in the Collection Basins Above the Elevation of the Outlet Pipe Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.
4. The outlet pipe will be inspected for blockage.
5. If blockage is present it will be removed to restore free flowing condition.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed, or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.13.34.12.3 Water Level in the Sediment Basin Above the Elevation of the Outlet Pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~.
3. The facility will be placed out of service.
4. The outlet pipe will be inspected for blockage.
5. If blockage is present it will be removed to restore free flowing condition.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed, or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.13.44.12.4 Leakage of Stormwater Detected at the Digging Facility Manhole:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.

4. When repairs are completed, the facility may be placed back in service.
5. If repairs cannot be made within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

#### 4.13.54.12.5 Discrepancy in Exposed Asphalt Pad and Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee immediately.
2. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~.
3. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting or designee~~.
- 5.4. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the ~~Executive Secretary~~ Director.
- 6.5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
- 7.6. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

#### 4.14.13 Decontamination Access Control Building:

##### 4.14.14.13.1 Lack of Free Drainage to the Wastewater Collection Tank:

1. The Facility Operator or BAT Inspector will notify the ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee immediately.
2. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~.
3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service.
4. An inspection will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the bootwash, respirator sink, and sink next to shower may be placed back in service.

7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

4.14.24.13.2 Visual Alarms Located Inside the Building at the Bootwash and Respirator Sink Activated:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Facility Manager to schedule the manual removal of water from the collection tank.~~
2. If water is not removed from the collection tank within the same working day, the bootwash, respirator sink, shower, and sink next to shower will be placed out of service.
3. Upon completion of water removal, the out of service designation will be removed from the bootwash, respirator sink, shower, and sink next to shower.

4.14.34.13.3 Water Level in the Wastewater Collection Tank Not Below the Bottom Elevation of the Inlet Pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately.~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service.
4. Water will be removed from the tank.
5. Upon completion of water removal, the out of service designation will be removed from the bootwash, respirator sink, shower, and sink next to shower.
6. If water is not removed, within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

4.14.44.13.4 Presence of Fluids in Leak Detection System:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately.~~
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.

3. The bootwash, respirator sink, shower, and sink next to shower will be placed out of service
4. The QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
5. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery.
6. Fluid will be collected from the leak detection system.
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
8. A written report including remediation plans if necessary will be submitted to the DRC.

#### 4.154.14 Intermodal Container Wash Building:

##### 4.15.14.14.1 Water Level in the Sediment Basin Sump At or Above the Weir Grate:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees.~~
3. The facility will be placed out of service.
4. Water will be removed from the sump.
5. If water is not removed, within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

##### 4.15.24.14.2 Lack of Free Drainage from the Bootwash to the Troughs:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees.~~
3. The facility will be placed out of service.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification.

8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.15.34.14.3 Lack of Free Drainage Through the Troughs to the Sediment Basin:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.
4. An inspection of the drainage system will occur to determine if blockage is present.
5. If blockage is present it will be removed to restore free drainage.
6. When free drainage is restored, the facility may be placed back in service.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

## 4.15.44.14.4 Presence of Fluids in Leak Detection System:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The facility will be taken out of service.
4. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
5. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.
6. Fluid will be collected from the leak detection system.
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
8. A written report including remediation plans if necessary will be submitted to the DRC.

## 4.15.54.14.5 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The affected bay(s) will be placed out of service.
4. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director~~ will provide just cause to the ~~Director of Compliance and Permitting~~ or designee.
6. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director.
7. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

**4.16.4.15 Shredder Facility:****4.16.14.15.1 Lack of Free Drainage from Concrete Surface to Catchbasins:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present. Water will be removed from the sump.
5. If blockage is present, remove blockage.
6. Place facility back in service when free drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.16.24.15.2 Presence of Leakage from Manhole 1 Pipeline to Water Storage Tanks:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. Place the facility out of service.
4. Inspect the pipeline to determine source of leak.
5. Repair the pipeline.
6. If repairs cannot be completed within the same work day that the leak was discovered, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.16.34.15.3 High Water Level Alarms Activated at the Water Storage Tank(s):**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. Place the facility out of service.

4. The Manager, Waste Disposal Operations will ~~Facility Operator or BAT Inspector~~ will notify the Facility Manager or ~~designee~~ to schedule the manual removal of water from the storage tank.
5. If the water is not removed below the high water level within the same working day that the alarm was activated, the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~.
6. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery.
8. Upon completion of water removal below the high water level, the facility may be placed back in service.

4.16.44.15.4 Valve to Alternate Wastewater Management System in Closed Position when Managing PCB Waste:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~.
3. The facility will be placed out of service.
4. Valve to the Rotary Dump Facility will be checked to ensure that it is in the closed position. If this valve is in the "open" position, the actions of 4.16.5, below, will be implemented.
5. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~, together with the ~~Director of~~ Manager, Compliance and Permitting, will assess the situation and open the valve to the alternate wastewater management system prior to placing the system back in service.

4.16.54.15.5 Valve to Rotary Dump Facility in Open Position when Managing PCB Waste:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~.
3. The facility will be placed out of service.
4. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will determine necessary sampling activities.

4.16.64.15.6 Facility Not Labeled for PCBs as Required:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. The facility will be placed out of service.
4. The Facility Operator or BAT Inspector will ensure proper labeling of facility.
5. The facility will be placed back in service.

4.16.74.15.7 Water Storage Tank Not Labeled as PCBs as Required:

1. The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. The facility will be placed out of service.
4. The Facility Operator or BAT Inspector will ensure the tank is properly labeled.
5. The facility will be placed back in service.

4.16.84.15.8 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
3. Repairs will be completed within 10 working days of discovery or the ~~Applicable Site Director or designee~~ will provide just cause to the ~~Director of Compliance and Permitting~~~~or designee~~.
- 4.3. ~~The Director~~Manager, of Compliance and Permitting ~~or designee~~ will provide just cause in writing to the ~~Executive Secretary~~Director.
- 5.4. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the ~~Executive Secretary~~Director, the QAM or the ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
- 6.5. The ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.16.94.15.9 Shredded Material Remaining on the Outfeed Pad at End of Shift:

1. The Facility Operator will cease operation of the Shredder Facility.
2. The Facility Operator will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ QAM immediately.

3. The ~~Manager, Waste Disposal Operations Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~.
4. The Facility Operator will ensure that the material is no longer susceptible to wind dispersal as follows:
  - a. Containerize shredded material; or
  - b. Cover with a nominal 6" inches of soil or soil-like waste material; or
  - c. Cover with a commercial fixative to prevent wind dispersal and leachate generation, applied in accordance with the manufacturer's instructions.
5. The QAM or the ~~Director of Manager, Compliance and Permitting or designee~~ will provide verbal notification to the DRC within 24 hours of identification that shredded material was not removed by the end of shift.
6. The ~~Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that material was not removed from the outfeed pad by the end of the shift.
7. The Shredder Facility may not continue operation until the shredded material is removed.

#### 4.174.16 Rotary Dump Facility

##### 4.17.14.16.1 Thaw Building:

##### 4.17.1.14.16.1.1 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the ~~Manager, Waste Disposal Operations Applicable Site Director or designee~~ immediately.
2. The ~~Manager, Waste Disposal Operations Applicable Site Director or designee~~ will notify the QAM and ~~Director of Manager, Compliance and Permitting or designees~~.
3. The ~~Manager, Waste Disposal Operations Applicable Site Director~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
5. ~~The Director of Manager, Compliance and Permitting will provide just cause in writing to the Executive Secretary Director.~~
6. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.~~
7. ~~The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.~~

4.17.1.24.16.1.2 Ponding of Water on the Granular Floor Surface of the Thaw Building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting.
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.17.1.34.16.1.3 Blockage of Pipe from Thaw Building to Rotary Floor:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. Place the facility out of service.
4. Remove blockage.
5. Place the facility back in service when drainage is restored.
6. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.17.24.16.2 Wash Building:

4.17.2.14.16.2.1 Discrepancy in Exposed Concrete Integrity of the curbing at the east end of the wash building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.

2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. An absorbent material will be placed along the curbing to deter water flow past the curb.
4. The Manager, Waste Disposal Operations Applicable Site Director or designee will schedule repairs to the exposed pad within 48 hours after receiving notification.
- ~~5.~~ Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting.
- ~~6.~~ ~~5.~~ The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary Director.
- ~~7.~~ ~~6.~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
- ~~8.~~ ~~7.~~ The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.17.2.24.16.2.2 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations Applicable Site Director or designee immediately.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. The Manager, Waste Disposal Operations Applicable Site Director or designee will schedule repairs to the exposed pad within 48 hours after receiving notification.
- ~~4.~~ Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting.
- ~~5.~~ ~~4.~~ The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary Director.
- ~~6.~~ ~~5.~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
- ~~7.~~ ~~6.~~ The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.17.2.34.16.2.3 Integrity Breach at Surface Seal Around Footing

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Facility Operator or BAT Inspector will place the Wash Building out of service.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
4. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the surface seals within 48 hours after receiving notification.
5. Repairs will be completed within 10 working days of discovery or the Applicable Site Director will provide just cause to the Director of Compliance and Permitting.
6. ~~The Director of Manager, Compliance and Permitting or designee~~ will provide just cause in writing to the Executive Secretary ~~Director~~.
7. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~ Director, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
8. ~~The Director of Manager, Compliance and Permitting or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

4.17.2.44.16.2.4 Water Level Above Grates Within the Wash Building:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.17.2.54.16.2.5 Lack of Free Drainage from the Floor to the Trench:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
3. The facility will be placed out of service.
4. Perform an inspection to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

#### 4.17.34.16.3 Rotary Building

##### 4.17.3.14.16.3.1 Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting ~~or designees~~.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting ~~or designee~~.
- 5.4. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide just cause in writing to the Executive Secretary ~~Director~~.
- 6.5. If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary ~~Director~~, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
- 7.6. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

##### 4.17.3.24.16.3.2 Lack of Free Drainage from Rotary Dump Floor to Sediment Basin (When waste management activities are not occurring):

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. Place the facility out of service.
4. Perform an inspection of the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when free drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.17.3.34.16.3.3 Water Level Above the Grate in the Sediment Basin:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~Manager, Compliance and Permitting~~or designees~~.
3. Waste management activities at the facility will cease (waste may be removed from the facility).
4. The submersible pump will be inspected to see if functioning properly.
5. If the submersible pump requires repair or replacement, it will occur within the same working day.
6. The pipeline from the submersible pump to the northwest corner evaporation pond will be inspected for blockage.
7. If blockage is present within the pipeline it will be removed.
8. When blockage of pipeline is removed and/or pump repair or replacement has been completed, the facility may be placed back in service.
9. If blockage cannot be removed and/or pump repair/replacement cannot be completed, or is not completed within the same working day, the QAM or the ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
10. The ~~Director of~~Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.17.3.44.16.3.4 Presence of Fluids in Sediment Basin Leak Detection System:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.

2. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The facility will be taken out of service.
4. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
5. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.
6. Fluid will be collected from the leak detection system.
7. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
8. A written report including remediation plans if necessary will be submitted to the DRC.

4.17.3.54.16.3.5 Presence of Fluids in Leak Detection System for the Pipeline from Rotary Building to the Northwest Corner Evaporation Pond:

1. The Facility Operator or BAT Inspector will return the observation valve to the closed position.
2. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
3. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
4. The facility will be taken out of service.
5. The Facility Operator or BAT Inspector will close and lock the valve between the sediment basin and the Northwest Corner Evaporation Pond.
6. The ~~Manager, Waste Disposal Operations~~ Applicable Site Director will notify ~~provide notification to the Director of~~ Manager, Compliance and Permitting or designees, of the desire to operate the facility using the Alternate Wastewater Management Area.
7. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC.
8. Upon completion of DRC notification to use the Alternate Wastewater Management System, the Rotary Dump Facility may be placed in service.
9. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that fluids were present within the leak detection system.
10. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.
11. Fluid will be collected from the leak detection system.
12. Gamma Spectroscopy analysis will be performed on fluid collected to determine if radiological contamination has occurred.
13. A written report including remediation plans if necessary will be submitted to the DRC.

4.17.4.16.4 Alternate Wastewater Management Area (When Placed in Service and Locking Valve is in the "Open" Position)

4.17.4.14.16.4.1 Presence of Leakage from Sediment Basin Pipeline to Water Storage Tanks:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or Designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. Place the facility out of service.
4. Inspect the pipeline to determine origin of leak.
5. Repair the pipeline.
6. Place facility back in service when repairs are complete.
7. If repairs cannot be repaired within the same work day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.17.4.24.16.4.2 Visual Alarm at One or Both Storage Tanks:

1. The Rotary Dump Facility will be placed out of service
2. ~~The Facility Operator or BAT Inspector will notify the Facility Manager to schedule the Perform~~ manual removal of water from the collection tank.
3. If the water is not removed within the same working day, the Facility ~~Manager~~ Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~.
4. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
5. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.
7. Upon completion of water removal, the facility may be placed back in service.

4.17.4.34.16.4.3 Ponding of Water on the Concrete Surface at the Alternate Wastewater Management Area:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.

3. Place the facility out of service.
4. Inspect the drainage system to determine if blockage is present.
5. If blockage is present, remove blockage.
6. Place facility back in service when drainage is restored.
7. If blockage cannot be removed or is not removed within the same working day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.
8. The ~~Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.

~~4.17.4.4.16.4.4~~ Discrepancy in Exposed Concrete Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will schedule repairs to the exposed pad within 48 hours after receiving notification.
4. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
5. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide just cause in writing to the ~~Executive Secretary~~ Director.
6. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. ~~The Director of~~ Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

~~4.18.17~~ East Side Drainage System:

~~4.18.14.17.1~~ Stormwater Management System:

~~4.18.1.14.17.1.1~~ Catchbasin Water Level Above Outlet Pipe:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or designees.

3. Inspect the drainage system to determine why it is not free-draining.
4. Complete repairs as needed to restore free drainage within the same working day.
5. If free drainage is not restored within the same work day, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery.

~~4.18.1.24.17.1.2~~ Lift Sump Alarm Activated:

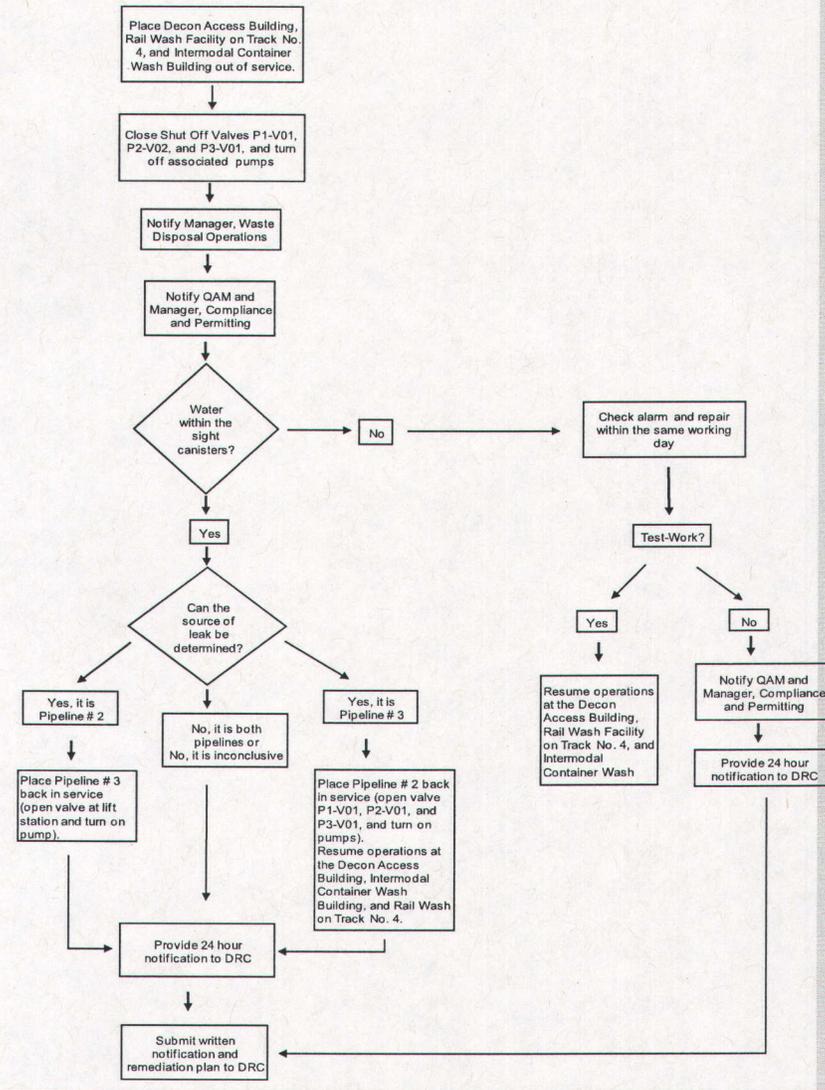
1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director~~ or ~~designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ or ~~designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting or ~~designees~~.
3. Inspect the alarm system to determine if functioning properly.
4. Inspect the sump pump(s) to determine if functioning properly.
5. If the sump pump(s) requires repair or replacement it will occur within the same working day.
6. If sump pump(s) cannot be repaired or replaced on the same working day of discovery, the QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification to the DRC within seven calendar days of discovery.

~~4.18.24.17.2~~ East Side Drainage System Gray Water:

4.18.2.14.17.2.1 Visual Alarm Activated at Manhole 1 (See Figure 1 of inspection form):

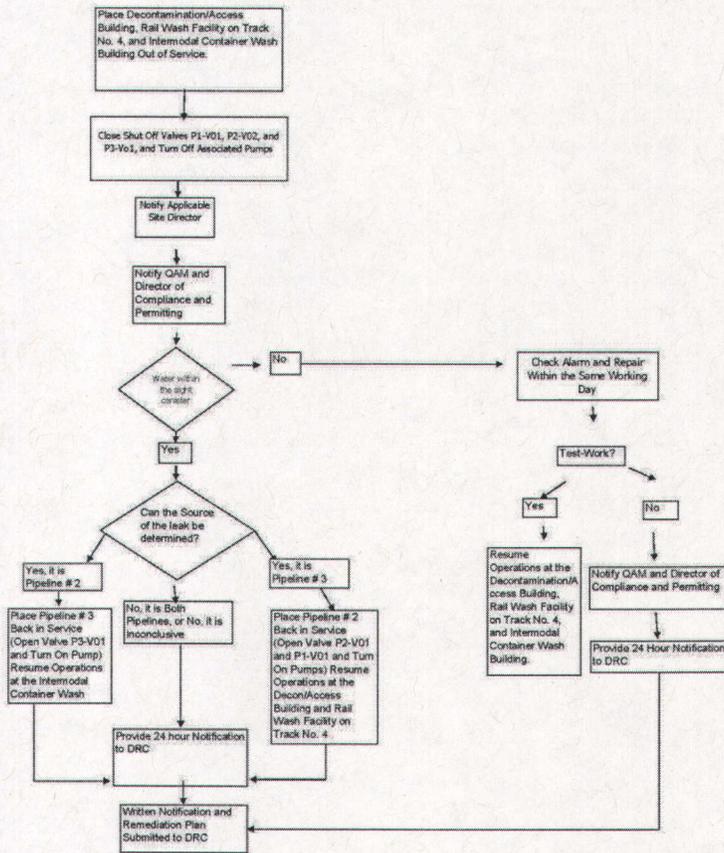
1. Perform Contingency Actions in accordance with the following Flow Chart.

**Alarm Activated at Manhole 1**



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### Alarm Activated at Manhole 1

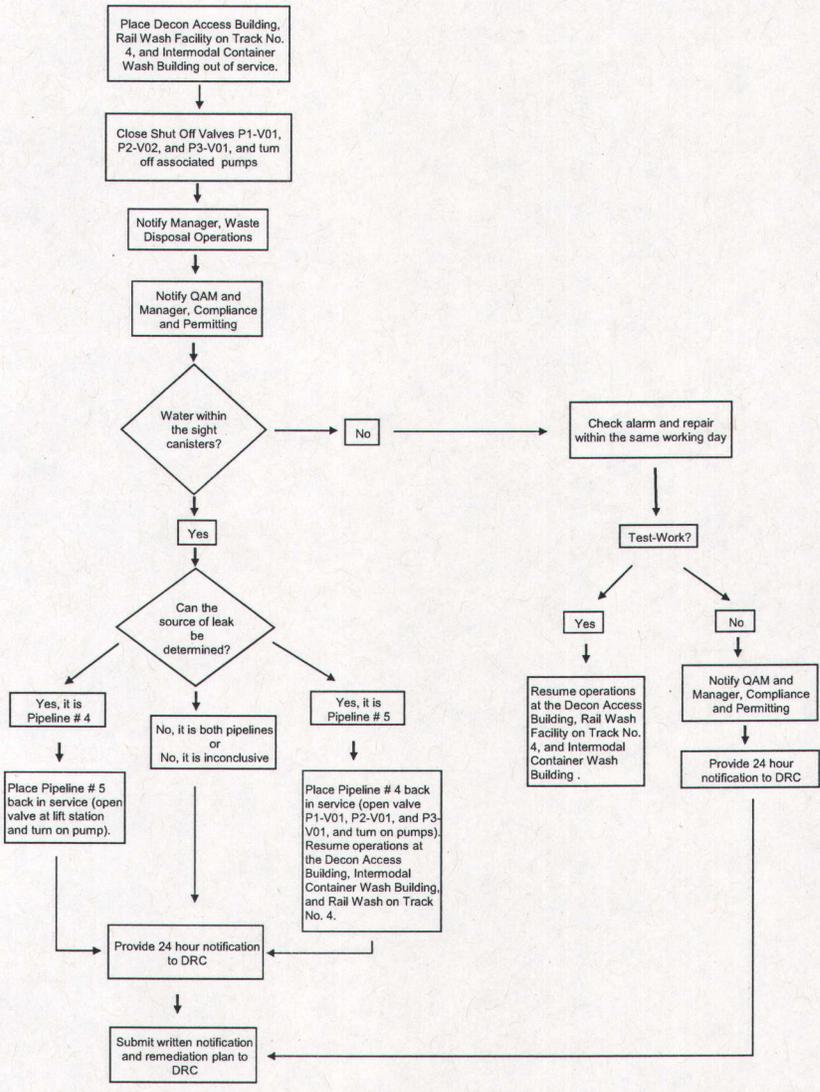


Revised January 21, 2008

4.18.2.24.17.2.2 Visual Alarm Activated at Manhole 2 (See Figure 1 of inspection form):

1. Perform Contingency Actions in accordance with following Flow Chart.

**Alarm Activated at Manhole 2**

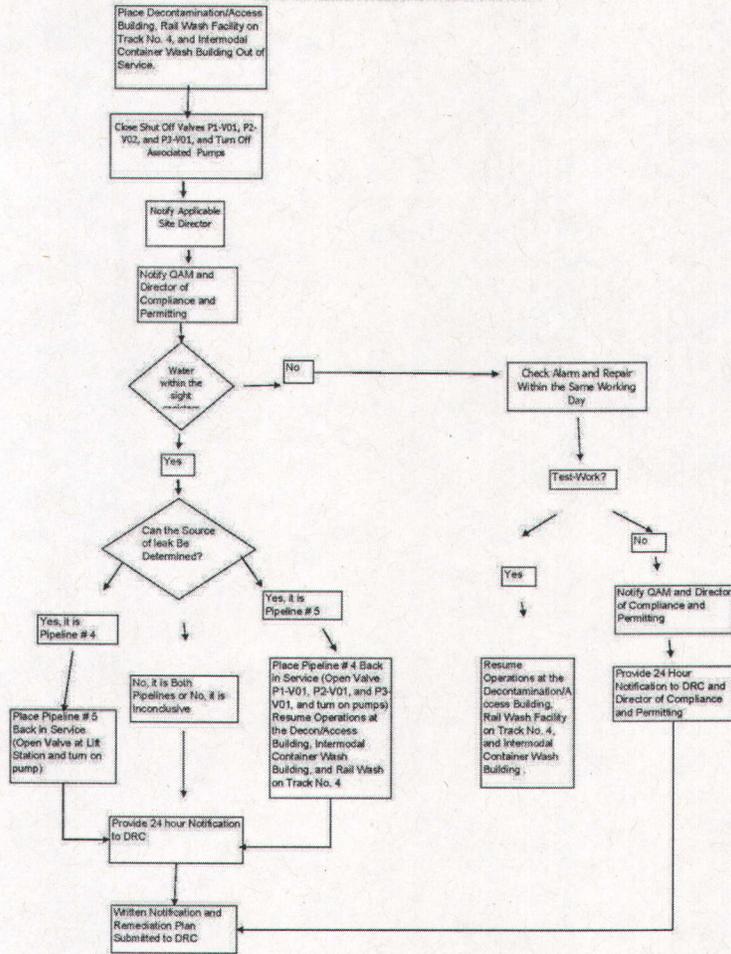


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**Alarm Activated at Manhole 2**



Revised January 21, 2008

## 4.18.2.3 Failure of the carrier pipe:

1. ~~The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~ Upon discovery the Applicable Site Director or designee will be notified immediately.
2. The affected shut-off valves will be closed, and associated pumps to affected facilities will be placed out of service.
3. ~~The Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM and ~~Director of Manager, Compliance and Permitting and Director of Manager, Engineering and Maintenance,~~ or designee.
4. The QAM or the ~~Director of Manager, Compliance and Permitting~~ or designee will provide verbal notification to the DRC within 24 hours of confirmation and provide notification of manual water removal from affected facilities.
5. ~~The Director of Manager, Compliance and Permitting~~ or designee will provide written notification to the DRC within seven calendar days of discovery.
6. ~~The Director of Manager, Engineering and Maintenance~~ will schedule testing of the containment pipe(s).
7. The containment pipe(s) will be tested based on the ASTM-F1417 method.
8. Upon completion of containment pipe testing, findings will be documented and a report submitted to the DRC within 30 calendar days. The report will include any completed or scheduled remediation.
9. Once remediation efforts have been completed, verification of the containment pipe repairs and remediation will be performed under the direction of and certified by a certified ~~Independent~~ Professional Engineer.
10. The facility will be placed back into service.

4.19.18 South Ditch

## 4.19.14.18.1 Pump system not functioning as designed: green light not activated when pump is present and operating:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. ~~The Manager, Waste Disposal Operations~~ Applicable Site Director or designee will notify the QAM, ~~Director of Manager, Engineering and Maintenance,~~ and ~~Director of Manager, Compliance and Permitting~~ or designees.
3. ~~The Director of Manager, Engineering and Maintenance~~ or designee will schedule repairs within 48 hours after receiving notification.
4. Repairs will be completed within 14 calendar days of discovery or the ~~Director of Engineering~~ or designee will provide just cause to the ~~Director of Compliance and Permitting~~ or designee.
5. ~~The Director of Manager, Compliance and Permitting~~ or designee will provide just cause in writing to the ~~Executive Secretary~~ Director.
5. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the ~~Executive Secretary~~ Director, the QAM or

~~the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.~~

6. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.19.24.18.2 Pump system not functioning as designed (pump is present but not operating with or without activation of green light):

- ~~1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately.~~~~
- ~~2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee will notify the QAM, Director of Manager, Engineering and Maintenance, and Director of Manager, Compliance and Permitting or designees.~~~~
3. Manual removal of water will begin within the same working day.
- ~~4. The Director of Manager, Engineering and Maintenance or designee will schedule repairs of the pump system within 48 hours after receiving notification.~~
- ~~5. Repairs will be completed within 14 calendar days of discovery or the Director of Engineering or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
- ~~6.5. The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary ~~Director.~~~~
6. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Executive Secretary ~~Director~~, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

4.19.34.18.3 Pump system not functioning as designed (blue light not activated when water is above the sump grate):

- ~~1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee immediately.~~~~
- ~~2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee will notify the QAM, Director of Manager, Engineering and Maintenance, and Director of Manager, Compliance and Permitting or designees.~~~~
- ~~3. The Director of Manager, Engineering and Maintenance or designee will schedule repairs within 48 hours after receiving notification.~~
- ~~4. Repairs will be completed within 14 calendar days of discovery or the Director of Engineering or designee will provide just cause to the Director of Compliance and Permitting or designee.~~

~~5.4. The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary/Director.~~

~~6.5. If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Executive Secretary/Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.~~

~~7.6. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.~~

~~4.19.44.18.4~~ Grate less than 75% clear of debris (determined during monthly pump and indicator light inspection):

- ~~1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations/Applicable Site Director or designee immediately.~~
- ~~2. The Facility Operator or BAT Inspector will notify individuals to remove debris from the grate.~~
- ~~3. Debris removal will be completed within 48 hours of discovery or the Director of Engineering or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
- ~~4.2. The Director of Manager, Compliance and Permitting or designee will provide just cause in writing to the Executive Secretary/Director.~~
- ~~5.3. If debris removal is not performed within 48 hours of discovery and just cause has not been provided to the Executive Secretary/Director, the QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification that the debris removal was not performed.~~
- ~~6.4. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of identification that the removal was not performed.~~

~~4.19.54.18.5~~ Manual water removal (only required when pump is not operating or has been removed during freezing weather) not initiated the same day as identification:

- ~~1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations/Applicable Site Director or designee immediately.~~
- ~~2. The Manager, Waste Disposal Operations Facility Operator or BAT Inspector will notify individuals to begin schedule manual water removal.~~
- ~~3. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.~~
- ~~4. The Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of identification.~~
- ~~5. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.~~

**4.20.4.19 LLRW Operations Building****4.20.4.19.1 High water level alarm (orange strobe) activated at the wastewater collection tank:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Facility Operator or BAT Inspector~~ will ~~notify the Facility Manager or designee~~ to schedule the manual removal of water from the storage tank.
3. If the water is not removed below the high water level by the end of the following workday after discovery, the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~.
4. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
5. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

**4.20.4.19.2 High-high-level alarm (red strobe) activated at the wastewater collection tank:**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
3. Place the wastewater generating systems (restricted area of the building) out of service.
4. The Manager, Waste Disposal Operations ~~Facility Operator or BAT Inspector~~ will ~~notify the Facility Manager or designee~~ to schedule the manual removal of water from the wastewater collection tank.
5. If the water is not removed below the high water level within the same working day of discovery, the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
6. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
7. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.
8. Upon completion of water removal below the high water level, the facility may be placed back in service.

**4.20.4.19.3 Presence of fluids in the leak detection system**

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM, Director of Manager, Compliance and Permitting, and Director of Manager, Engineering and Maintenance~~or designees~~.
3. The wastewater generating systems (restricted area of the building) will be placed out of service.
4. The Director of Manager, Engineering and Maintenance~~or designee~~, will determine the cause of the alarm and schedule repairs as needed.
5. The QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. If repairs to the inner (primary) tank are required, the tank shall be re-certified by an independent PE before being placed back into service.
7. If the sensor is determined to be faulty, the facility may be placed back into service once it is repaired or replaced and tested.
8. The Director of Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

#### 4.214.20 **SRS DU Storage Building**

##### 4.21.14.20.1 Discrepancy in Exposed Asphalt Integrity:

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations~~Applicable Site Director or designee~~ will notify the QAM and Director of Manager, Compliance and Permitting~~or designees~~.
3. The Manager, Waste Disposal Operations~~Applicable Site Director~~ will schedule repairs to the exposed asphalt surface within 48 hours after receiving notification.
4. Repairs will be completed within 10 working days of discovery or the Manager, Applicable Site Director~~or designee~~ will provide just cause to the Director of Compliance and Permitting~~or designee~~.
5. ~~4.~~ The Director of Compliance and Permitting will provide just cause in writing to the Executive Secretary~~Director~~.
6. ~~5.~~ If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~Director~~, the QAM or the Director of Manager, Compliance and Permitting~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
7. ~~6.~~ The Director of Manager, Compliance and Permitting~~or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

##### 4.21.24.20.2 Evidence of container leakage, corrosion, or deterioration

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and the Director of Manager, Compliance and Permitting ~~or designees~~.
3. An inspection will be performed to determine corrective actions as needed i.e. overpack of containers.
4. Corrective actions shall be completed and documented within the same working day.
5. If corrective actions cannot be completed within the same working day, the QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. If corrective actions cannot be completed with the same working day, the Director of Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

#### 4.21.34.20.3 Presence of water on the asphalt surface

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Manager, Waste Disposal Operations will schedule Facility Operator or BAT Inspector will notify individuals for water removal.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM, Director of Manager, Compliance and Permitting, and Director of Manager, Engineering and Maintenance ~~or designees~~.
4. An inspection will be performed to determine the source of the water and schedule repairs as needed.
5. The QAM or the Director of Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification.
6. The Director of Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

#### 4.224.21 **Evaporation Pond Ancillary Equipment to Facilitate Evaporation**

##### 4.22.14.21.1 Contact wastewater spill outside of the pond and secondary containment:

1. The Facility Operator or BAT Inspector will implement the Emergency Response Plan. Implementation automatically notifies the Manager, Waste Disposal Operations, QAM, and Manager, Compliance and Permitting.
2. ~~The Facility Operator or BAT Inspector will notify the Applicable Site Director or designee immediately.~~
3. ~~The Applicable Site Director or designee will notify the QAM and Director of Compliance and Permitting or designees.~~
4. ~~The spill will be cleaned up in accordance with the Emergency Response Plan. Initial (24-hour) and followup (7-day) reports will be made to the Executive Secretary/Director in accordance with that plan.~~

- 5.3. The ancillary equipment will be taken out of service until the cause of the spill has been determined and repaired.
- 6.4. Once the ancillary equipment has been repaired, 24 hour notification shall be provided to the ~~Executive Secretary~~ Director prior to placing the system back into service.

#### 4.22.24.21.2 Damage to the evaporation pond liner:

1. The ancillary equipment will be taken out of service immediately.
2. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Director of~~ Manager, Compliance and Permitting ~~or designees~~.
4. The Manager, Waste Disposal Operations ~~Applicable Site Director~~ will schedule repairs to the pond liner within 48 hours after receiving notification.
5. Once the pond liner has been repaired 24 hour notification shall be provided to the ~~Executive Secretary~~ Director prior to placing the system back into service.
6. ~~Repairs will be completed within 10 working days of discovery or the Applicable Site Director or designee will provide just cause to the Director of Compliance and Permitting or designee.~~
7. ~~The Director of~~ Manager, Compliance and Permitting will provide just cause in writing to the ~~Executive Secretary~~ Director.
8. ~~If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Executive Secretary~~ Director, the QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed.
9. ~~The Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of identification that repairs were not performed.

#### 4.23.4.22 Contingency Actions for Qualitative BAT Performance Standards

##### 4.23.14.22.1 Failure to complete inspections as required

1. The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ immediately.
2. The Facility Operator or BAT Inspector will perform missed inspection.
3. The Manager, Waste Disposal Operations ~~Applicable Site Director or designee~~ will notify the QAM and ~~Manager, Director of~~ Compliance and Permitting ~~or designees~~.
4. The QAM or the ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide verbal notification to the DRC within 24 hours of confirmation.
5. The ~~Director of~~ Manager, Compliance and Permitting ~~or designee~~ will provide written notification to the DRC within seven calendar days of discovery.

4.23.24.22.2 Failure to Comply with Waste Disposal Location Requirements:

1. Upon discovery the Applicable Site Director or designee will be notified immediately. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designee.
3. The QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of confirmation.
4. The Director of Manager, Compliance and Permitting or designee will provide written notification to the DRC within seven calendar days of discovery.
5. The waste will be removed from the location and disposed of in the correct location.
6. Follow up sampling will be performed to ensure that all waste material placed incorrectly has been completely removed and a report containing sample analytical results will be submitted for DRC approval. Upon approval, waste placement within the sampled area may resume.

4.23.34.22.3 Disposal of Unauthorized Wastes:

1. Upon discovery the Applicable Site Director or designee will be notified immediately. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. The QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC.
4. The Director of Manager, Compliance and Permitting or designee will provide written notification in accordance with the Permittee's Radioactive Material License.

4.23.44.22.4 Failure to Construct as Per Approval Designated in I.E.3:

1. Upon discovery the Applicable Site Director or designee will be notified immediately.
2. The Applicable Site Director of designee will notify the QAM and Director of Compliance and Permitting or designees.
3. The QAM or the Director of Compliance and Permitting or designee will provide verbal notification to the DRC.
4. The Director of Compliance and Permitting or designee will provide written notification in accordance with the Permittee's Radioactive Material License.

4.23.54.22.5 Failure to Complete a Portion of the Disposal Cell Within the Applicable Open Cell Time Limit:

1. Upon discovery the Applicable Site Director or designee will be notified immediately. Notify the Manager, Waste Disposal Operations
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. The QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of discovery.
4. The Director of Manager, Compliance and Permitting or designee will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

4.23.64.22.6 Failure to Comply with General Stormwater Management Requirements and Performance Criteria:

1. Upon discovery the Applicable Site Director or designee will be notified immediately. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designee.
3. The QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of discovery.
4. The Director of Manager, Compliance and Permitting or designee will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

4.23.74.22.7 Failure to Comply with 11e.(2) Waste Management and Storage Requirements:

1. Upon discovery the Applicable Site Director or designee will be notified immediately. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.
3. The QAM or the Director of Manager, Compliance and Permitting or designee will provide verbal notification to the DRC within 24 hours of discovery.
4. The Director of Manager, Compliance and Permitting or designee will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.

4.23.84.22.8 Failure to Comply with LLRW Waste Management Requirements:

1. Upon discovery the Applicable Site Director or designee will be notified immediately. Notify the Manager, Waste Disposal Operations.
2. The Manager, Waste Disposal Operations Applicable Site Director or designee will notify the QAM and Director of Manager, Compliance and Permitting or designees.

3. The QAM or the ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide verbal notification to the DRC within 24 hours of discovery.
4. The ~~Director of~~ Manager, Compliance and Permitting or ~~designee~~ will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery.