

Attachment E

May 21, 2013 Revised Request Letter from EnergySolutions

May 21, 2013

CD13-0148

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

**RECEIVED**

**MAY 23 2013**

Re: Ground Water Quality Discharge Permit No. UGW 450005 – Revised Request for  
Modification to Appendix J and K; Response to DRC Memorandum dated 7 May  
2013

DEPARTMENT OF  
ENVIRONMENTAL QUALITY

Dear Mr. Lundberg:

EnergySolutions met with Division staff on 8 May 2013 to discuss the proposed revisions to Appendices J and K of Ground Water Quality Discharge Permit No. UGW 450005 that were included in the draft Division Memorandum (dated 7 May 2013). During this meeting, it was decided that the Memorandum's revisions would be incorporated as drafted, with the following exceptions:

- 1) Replacement of the word "prevent" with "minimize" as related to stormwater contact for the Rail Rollover Facility, East Truck Unloading and Container Holding Pads, Rotary Dump Facility – Thaw Building, and the SRS DU Storage Building.
- 2) Since it is not involved in bulk waste management, removal of the daily and daily when stormwater present inspection requirements from the Containerized Waste Storage Pad.
- 3) Since they are not involved in bulk waste management, removal of the daily and daily when stormwater present inspection requirements from the East Truck Unloading Area and Container Holding Pads.

- 4) Since it does not involve the use of additional water to building nor is it involved in bulk waste management, removal of the daily and daily when stormwater present inspection requirements from the Rotary Dump Facility Thaw Building.

Subsequent to those improvements included in the Division's Memorandum and the meeting of 8 May 2013, *EnergySolutions* proposes the following additional enhancements in inspection efficiencies:

- 1) Since manholes 1 and 2 and lift station alarms are checked daily, *EnergySolutions* proposes changing East Side Drainage System leak detection system check from weekly to monthly.
- 2) *EnergySolutions* proposes correction of the LLRW Operations Building alarm function test frequency to reflect the annual inspection currently performed.
- 3) Since the Manager, Waste Operations is required to turn off water access to the LLRW Operations Building lab each night (as part of Division-approved corrective actions) and the associated lab alarm status is inspected daily, *EnergySolutions* proposes to change the inspection frequency of free drainage from the laboratory to the collection tank to monthly.
- 4) Based on site conditions wherein water is only able to enter the SRS DU Storage Building at times of wind-blown storm events, *EnergySolutions* proposes a change for SRS DU Storage Building inspections to daily when storm water present and monthly.

Enclosed please find clean versions of Appendices J and K (including corrected versions of Table 1 and Forms 1, 1a, 1b, 2, and 3 of Appendix J), that reflect the subsequent changes presented herein, the revisions agreed to during the meeting of 8 May 2013, and the original Division Memorandum. Redline/strikeout digital files of these attachments will be electronically transmitted separately. Please contact me or Sean McCandless at 801-649-2000 with any questions regarding this issue.

Sincerely,



Vern C. Rogers  
Environmental Manager

enclosures

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

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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## 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 as required by Part I E 7 of the Permit, and on Form 1b when managing PCB wastes at the shredder facility.

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 provided there has been no waste handling or washing/decontamination activity for 48 hours prior to the facility being taken out of service. An “out of service” facility must be secured and inaccessible in such a manner so as to minimize any potential threat to ground water while out of service. Any facility taken out of service is not permitted for waste storage or management and shall remain in a dry and secure condition, while out of service, wherein BAT inspections are no longer applicable. The DRC shall be provided at least 48 hours email notification of the intent to take a facility out of service and provided the DRC an opportunity to inspect the facility after it has been taken 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 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 of the Permit, containers in storage at facilities other than the Class A West or 11e (2) disposal cell shall be managed to minimize the contact of waste with the ground surface and 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

**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.

Daily when stormwater is present inspection

For the purpose of this plan inspected on days when there is storm water accumulation on site

Dry and Secure A facility will be dry and secure when all water has been removed from a facility, all water access to the facility is denied, and the facility is locked down and cannot be accessed/occupied without the consent of the Manger, Waste Disposal Operations

**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

**Monthly Inspection**

Monthly BAT inspections as defined in Table 1 and Form 3 are required to be performed once per month, whether the facility is in operation or not.

**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:**

Includes the cleanliness of the pad and 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 Manager, Compliance and Permitting

The **Manager, Waste Disposal Operations** or designee is responsible for maintaining assigned facilities in compliance with BAT requirements of the Clive site at all times. The Manager, Waste Disposal Operations (or designee) shall immediately notify the QAM when any BAT Failure occurs.

The **Radiation Safety Officer (RSO)** or designee is responsible for performing evaluations of any existing threat or potential threat to public health and the environment.

The **Facility Operator or BAT Inspector** performs the routine inspections and provides notification to the Manager, Waste Disposal Operations and Quality Assurance Manager of any BAT non-compliance. The Facility Operator or BAT Inspector has the authority to initiate repairs when needed.

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

The **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 reviewing video inspection of the lysimeters. The Manager, Compliance and Permitting is responsible for providing required written notification to the regulatory agencies.

The **Manager, Engineering and Maintenance** or designee is responsible for scheduling and oversight of pump down testing if required, 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 Best Available Technology, summarized in Table 1, BAT Monitoring and Performance Criteria, to minimize discharge of fluids from the following facilities to subsurface soils or groundwater. Table 1 provides a 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 Corner, and Mixed Waste Evaporation Ponds

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 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 of the Permit, 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

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

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

#### ***4.3 2000 Evaporation Pond Transfer Pad***

The 2000 Evaporation Pond Transfer Pad is designed and constructed with gravity flow to provide free drainage of water from the transfer pad to the collection sump

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

The Northwest corner Evaporation 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

#### ***4.5 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 minimize 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 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 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 next Semi-annual BAT Monitoring Report.***

#### ***4.6 Containerized Waste Storage Pad***

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

#### ***4.7 Intermodal Unloading Facility (IUF)***

The IUF is designed with gravity flow 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 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 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

#### ***4.8 Intermodal Unloading Facility Lift Station***

The IUF Lift Station is designed and constructed to collect wastewater from the Rail Wash Facility on Track No 2, the IUF, the Railcar Digging Facility, and the Rail Rollover Facility for transfer via gravity flow to the 1995/1997 pond lift station An alarm will activate when the water level within the lift station rises above the lowest level of the inlet pipe

#### ***4.9 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 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 cap placed over the outlet from the facility is inspected for integrity

#### ***4.10 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 floor is inspected to ensure total containment of water and that there is no direct or indirect discharge to subsurface soils or groundwater The facility also includes an adjacent equipment/mechanics building that contains the collection tank(s) for the washing operations

#### ***4.11 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 IUF Lift Station. The Rail Digging Facility is designed for digging waste from rail cars and transferring it to hauling equipment. No waste storage will occur.

#### ***4.12 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 gravity flow to direct stormwater accumulated on the asphalt surfaces away from the concrete container holding pads. The concrete container holding pads are designed with gravity flow to direct water that accumulates on the concrete surface to collection troughs.

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.

#### ***4.13 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.

#### ***4.14 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.

#### ***4.15 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 to the Northwest Corner Evaporation Pond. Because the 7 catchbasins are located at least 3.5 feet lower in elevation than the top of Manhole 1, used to pump water to the tanks, inspecting each catchbasin also functions as an inspection for functionality of the submersible pump in Manhole 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

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 be used during the shredding of PCB waste and may be used 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 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.

#### ***4.16 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 next Semi-annual BAT Monitoring Report.

##### **4.16.1 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 minimize 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.

##### **4.16.2 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. The Rotary Building floor is sloped for free drainage of

wastewater to the sediment basin. 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 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.

#### **4.16.3 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.

#### **4.16.4 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 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.

#### **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. A process flow diagram of the system is provided as Figure 1.

The wastewater system is designed as follows: 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

#### **4.17.1 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

#### **4.17.2 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

#### **4.17.3 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

#### **4.17.4 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.

#### **4.17.5 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.

#### **4.17.6 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 IUF, 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.



#### **4.17.7 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 Director. A written report including test results will be maintained in the operating record.

#### **4.18 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 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.

#### **4.19 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 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 bootwash and sample prep room floor drains are the lowest elevation floor drains in the building, and therefore will provide the earliest indication if the tank is overfilled.

#### **4.20 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.

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

Ancillary equipment intended to facilitate evaporation at all Evaporation Ponds 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.

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.

#### ***4.22 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 West embankment 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 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 West and 11e (2) Disposal Cells
- 2) Contact stormwater at the Rail Rollover and Rotary Dump Facility
- 3) Contact stormwater at the 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 Manager, Compliance and Permitting or designee shall provide notification and justification to the Director whenever equipment bypasses a higher priority for use at a lower priority location.

Approval must be obtained from the 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 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 review inspection forms for accuracy and completeness.

The Manager, Waste Disposal Operations or designee will conduct a monthly assessment of the daily and weekly inspections to ensure inspection activities are performed in accordance with this plan. 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

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
1995, 1997, 2000, Northwest Corner, and Mixed Waste Evaporation Ponds	Freeboard between pond water level and spillway elevation, measured vertically	<b>Daily</b> – visual inspection	Minimum of 24 inches of freeboard	Form 1 (Form 4 for MW Pond)
	Leak detection system and monitoring equipment including leak detection system pump, head pressure transducer, and flow meters	<b>Daily</b> – Record water flow meter reading, record fluid head reading from pressure transducer <b>Weekly</b> – Calculate seven-day average flow rate	Pressure transducer $\leq$ 10 foot Flow rate initial action levels for each evaporation Pond 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 pump	<b>Annual</b> – inspection and maintenance	Procedure CL-EN-PR-023, <i>Annual Evaporation Pond Pump Inspection</i>	Procedure CL-EN-PR-023, form CL-EN-PR-023 F1
	Pump functionality and return pipe integrity	<b>Monthly</b> – inspect piping from leak detection system to pond through the manual removal of water	Pump operational, no leakage from piping	Form 3
1995/1997 Evaporation Pond Lift Station	Water level within the lift station	<b>Daily</b> – Inspect for visual alarm activation <b>Monthly</b> – Confirm alarm function	Water level not to exceed the lowest level of the inlet pipe (set point for alarm) Alarm trips manually	Form 1 Form 3
	Gravity flow from the pad to the collection sump	<b>Daily when stormwater present</b> – free drainage, sump water level <b>Weekly</b> – Surface integrity	Free drainage, water below grate of sump See definition “Surface Integrity Discrepancy”	Form 1a Form 2

**TABLE 1**

**BAT MONITORING AND PERFORMANCE CRITERIA**

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
Northwest Corner Evaporation Pond Transfer Facility	Concrete pad with HDPE apron for water transfer and collection	<b>Monthly</b> – Surface integrity, inspect pad apron for signs of cracks, tears, or holes	No holes, cracks, or tears at the seam between the concrete apron and HDPE liner See definition “Surface Integrity Discrepancy”	Form 3
Rail Rollover Facility	Minimize stormwater contact with waste	<b>Daily</b> - free drainage <b>Daily when stormwater present</b> – free drainage, sump water level, sump pump <b>Weekly</b> – Surface integrity, sump pump <b>Annual</b> – Clean entire surface for detailed surface integrity inspection	Free drainage, no ponding of water within covered area, water below grate of sump, sump pump operational, repair of concrete and asphalt surfaces See definitions “Free Drainage”, and “Surface Integrity Discrepancy”	Form 1 Form 1a Form 2 Engineer’s report of annual inspection
Containerized Waste Storage Pad	Minimize stormwater from contacting waste	<b>Weekly</b> – Surface integrity, container storage compliance cleanliness of pad surface, free drainage, sump water level	Free drainage, water below grate of sump See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance”	Form 2

**TABLE 1**

**BAT MONITORING AND PERFORMANCE CRITERIA**

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
Intermodal Unloading Facility (IUF)	Minimize stormwater contact with waste	<b>Daily when stormwater present</b> – free drainage, sump water level <b>Weekly</b> – Surface integrity, container storage compliance, and cleanliness of pad surface <b>Annual</b> – Clean entire surface for detailed surface integrity inspection (see section 4 7)	Free drainage, water below grate of sump See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance”	Form 1a Form 2 Engineer’s report of annual inspection
IUF Lift Station	Contain contact water within facility	<b>Daily</b> – Inspect for visual alarm activation <b>Monthly</b> – Alarm function	Water level not to exceed the lowest level of the inlet pipe (set point for alarm) Alarm trips manually	Form 1 Form 3
LARW Box Washing Facility	Contain contact water within facility	<b>Daily</b> -Sump water level, free drainage, holding tank water level <b>Weekly</b> – surface integrity, pipeline cap	Sump water level below grate, free drainage, tank water level $\leq \frac{3}{4}$ full, see definition “Surface Integrity Discrepancy”, pipeline cap intact,	Form 1 Form 2
Rail Wash Facility on Track No 4	Contain contact water within facility	<b>Daily</b> -Sump water level, free drainage (including concrete trench), and water level in collection and storage tanks <b>Weekly</b> – surface integrity, sump pump operational, inspection of collection and storage tanks <b>Monthly</b> – Alarm function	Sump water level below grate, free drainage, see definition “Surface Integrity Discrepancy” Alarm trips manually	Form 1 Form 2 Form 3

**TABLE 1**  
**BAT MONITORING AND PERFORMANCE CRITERIA**

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
Rail Digging Facility	Minimize stormwater contact with waste	<p><b>Daily</b>- cleanliness of asphalt and concrete surface</p> <p><b>Daily when stormwater present</b> – free drainage, sump water level</p> <p><b>Weekly</b> – Surface integrity</p>	Free drainage, water below grate of sump (4) See definition “Surface Integrity Discrepancy”	Form 1 Form 1a Form 2
East Truck Unloading Area and Container Holding Pads	Minimize stormwater from contacting waste	<p><b>Daily</b>- manholes 1 and 2 strobe alarm, lift station alarm, free drainage</p> <p><b>Monthly</b>– Surface integrity, container storage compliance, cleanliness of container holding pads, free drainage, and collection trough water level</p>	Free drainage, water level $\leq$ $\frac{3}{4}$ full See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance”	Form 1 Form 3
Decontamination Access Control Building	Contain contact water within facility	<p><b>Daily</b>- free drainage</p> <p><b>Weekly</b> – Level of wastewater in the tank, leak detection system check</p> <p><b>Monthly</b> – Alarm function</p>	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	Form 1 Form 2 Form 3
Intermodal Container Wash Building	Contain contact water within facility	<p><b>Daily</b>-Sediment basin water level, free drainage</p> <p><b>Weekly</b> – surface integrity, leak detection system</p>	Sump water level below grate, free drainage from boot-washes to troughs, from wash-bays to troughs through to the sediment basin, see definition “Surface Integrity Discrepancy”, no fluids in leak detection system	Form 1 Form 2

**TABLE 1**

**BAT MONITORING AND PERFORMANCE CRITERIA**

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
Shredder Facility	Minimize stormwater contact with waste	<p><b>Daily</b>- free drainage</p> <p><b>Daily when stormwater present</b> – free drainage, sump water level</p> <p><b>Weekly</b> – surface integrity</p> <p><b>Annual</b> – Clean entire surface for detailed surface integrity inspection</p>	<p>Free drainage to catch-basins, water below grate of sump (7)</p> <p>Shredded material removed from the outfeed pad by the end of shift</p> <p>See definition “Surface Integrity Discrepancy”</p>	<p>Form 1</p> <p>Form 1a</p> <p>Form 2</p> <p>Engineer’s report of annual inspection</p>
Shredder Facility Alternate Wastewater Management System	Minimize stormwater contact with waste	<p><b>Daily</b> when in use – free drainage, pipeline integrity, high water level alarm, surface integrity</p> <p><b>Monthly</b> – Alarm function</p>	<p>Free drainage, water below grate of sump (7), pipeline not leaking, high level alarm off, see definition “Surface Integrity Discrepancy”</p> <p>Alarm trips manually</p>	<p>Form 1b</p> <p>Form 3</p>
Rotary Dump Facility – Thaw Building	Consists of the Thaw, Rotary, and Wash buildings. Minimize stormwater contact with waste and contain contact water within all facilities. Contain contact water within facility	<p><b>Weekly</b> – free drainage (within Thaw Building and at discharge pipe), surface integrity</p>	<p>Free drainage, discharge pipe not blocked, see definition “Surface Integrity”</p>	<p>Form 2</p>

**TABLE 1**

**BAT MONITORING AND PERFORMANCE CRITERIA**

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
Rotary Dump Facility – Rotary Building	Contain contact water within facility	<p><b>Daily</b>– free drainage, sediment basin water level</p> <p><b>Weekly</b> – surface integrity, leak detection system</p> <p><b>Annual</b> – Clean entire surface for detailed surface integrity inspection (includes Thaw Building and Wash Building concrete surfaces)</p>	Free drainage, water below grate of sediment basin See definition “Surface Integrity Discrepancy”, no fluids in leak detection system	Form 1 Form 2 Engineer’s report of annual inspection
Rotary Dump Facility – Wash Building	Contain contact water within facility	<p><b>Daily</b>-free drainage, water in trenches below grates</p> <p><b>Weekly</b> – surface integrity (including east curb and seals around stairway footing)</p>	Free drainage, see definition “Surface Integrity	Form 1 Form 2
Rotary Dump Facility – Alternate Wastewater Management Area	Contain contact water within facility	<p><b>Daily</b> - inspection for leakage in the pipeline from sediment basin to wastewater storage tanks, activation of visual alarms at wastewater storage tanks</p> <p><b>Weekly</b> – free drainage, pipeline integrity, high water level alarm, surface integrity</p> <p><b>Monthly</b> – Alarm function</p>	Free drainage,, pipeline not leaking, high level alarm off, see definition “Surface Integrity Discrepancy” Alarm trips manually	Form 1b Form 2 Form 3

**TABLE 1**

**BAT MONITORING AND PERFORMANCE CRITERIA**

<b>FACILITY</b>	<b>BAT DESCRIPTION</b>	<b>INSPECTION AND MAINTENANCE</b>	<b>PERFORMANCE CRITERIA</b>	<b>DOCUMENTATION</b>
East Side Drainage System	Contain contact water within system	<b>Daily</b> – Manhole 1, 2, and stormwater lift station alarms <b>Weekly</b> – Leak detection system check <b>Monthly</b> – Alarm function <b>Annual</b> – Pressure test	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
South Ditch	Reduce a potential source of groundwater recharge via timely transfer of water to Southwest Corner Pond	<b>Daily when stormwater present</b> – pump operating <b>Monthly</b> – Alarm function	Pump operates while water in sump or manual removal Alarm trips manually	Form 1a Form 3
LLRW Operations Building	Contain contact water within facility	<b>Daily</b> – Alarm status <b>Monthly</b> – Free drainage to the wastewater collection tank <b>Annual</b> – Alarm function	Alarms off Boot-wash and sample prep room floor drains free drain Alarm trips manually	Form 1 Form 3 Engineer’s report of annual inspection
SRS DU Storage Building	Minimize stormwater from contacting waste	<b>Daily when stormwater present</b> – Surface integrity, container storage compliance, check for presence of water <b>Monthly</b> – Surface integrity, container storage compliance, check for presence of water	See definitions “Surface Integrity Discrepancy” and “Container Storage Compliance”, remove any water observed	Form 1a Form 3
Evaporation Pond Ancillary Equipment to Facilitate Evaporation	Contain contact water within the pond	<b>Daily</b> – pond liner integrity, system containment	Maintenance of pond liner integrity and prevention of spillage outside of pond or secondary containment	Form 1



# 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): _____
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## 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

Pnd Lift	Is the Visual Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
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East side Drainage	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"/>

East side Unloading	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"/>

Dech Accs	Is the surface free draining?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
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LLRW Ops	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"/>

IUF	Is the Visual Alarm activated?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
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Rail Roll Ovr	Is there free drainage?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
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# LLRW/11e.(2) DAILY STORMWATER INSPECTION – Form 1a (page 2)

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

## Stormwater Collection Worksheet

Name		CL-LD-PR-704 F1, Rev 2			Truck #
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					

List names of personnel working on the rig:

Daily Completion Time:

Comments

### Contact Water Areas

- 1--Class A Embankment (Priority 1)
- 2--Class A North Embankment (Priority 1)
- 3--11e (2) Embankment (Priority 1)
- 4--Rollover Facility (Priority 2)
- 5--Intermodal Unloading Facility (Priority 2)

### Non-Contact Water Areas

- 6--Vitro Boundary (Priority 3)
- 7--Northwest Operations Area (Priority 3)
- 8--LLRW Operations (Priority 3)
- 9--East Side Operations (Priority 3)
- 10--Other (Priority 3)

Driver Signature:

Date:

Manager Signature:

Date:





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

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

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

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

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

<b>Y</b>	<b>N</b>
<input type="checkbox"/>	<input type="checkbox"/>

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

<b>1995</b> Pond	Calculation of seven-day average flow rate _____	Test above 155 gal/day Max rate of 162 gal/day	Notify Manager <input type="checkbox"/>
<b>1997</b> Pond	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</b> Pond	Calculation of seven-day average flow rate _____	Test above 355 gal/day Max rate of 382 gal/day	Notify Manager <input type="checkbox"/>
<b>NWC</b> Pond	Calculation of seven-day average flow rate _____	Test above 300 gal/day Max rate of 326 gal/day	Notify Manager <input type="checkbox"/>
<b>East</b> Side Drain	Is the leak detection system operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>2000</b> Transfer Pad	Any integrity defects on exposed concrete?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>Rail</b> Rollover	Are there defects in the surface integrity?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Is the sump pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>CW</b> Storage Pad	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"/>
	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</b> Access	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</b> Wash	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"/>
<b>Track 4</b> Wash	Is the sump operational?	<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"/>
<b>Rail</b> Dig	Are there any integrity defects in the exposed surface?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
<b>ICW</b>	Are the leak detection systems in Ports 1 and 2 free of fluid?	<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"/>





# 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): \_\_\_\_\_

<b>1995 Pond</b>	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"/>
<b>1997 Pond</b>	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"/>
<b>Pond Lift</b>	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>2000 Pond</b>	Is the pump operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>NWC Pond</b>	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"/>
<b>NWC Transfr</b>	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"/>
<b>IUF Lift</b>	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>T 4 Wash</b>	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>Rot Dump</b>	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>East Side Drainage</b>	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"/>
<b>East Truck Unloading</b>	Are there surface integrity defects?	<input type="checkbox"/> No	Notify Manager <input type="checkbox"/>
	Are containers stored compliantly?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Is the collection trough water level below the grate?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
	Are the holding pads clean and free draining?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>Decn Accs</b>	Is the alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>Shrdr</b>	Is the tank alarm operational?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>
<b>South Ditch</b>	Is the alarm functioning properly?	<input type="checkbox"/> Yes	Notify Manager <input type="checkbox"/>



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

**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

**4.1.2 Evaporation Pond Freeboard Exceedance**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 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 will notify the QAM and Manager, Compliance and Permitting
- 4 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 5 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery
- 6

**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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The pipeline will be repaired

- 4 If the pipeline cannot be repaired within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 5 The Manager, Compliance and Permitting 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

<b>Evaporation Pond</b>	<b>Initial Action Level for Average Leakage Rate (in gallons)</b>
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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations will notify the Manager, Engineering and Maintenance
- 4 Within five days the Manager, Engineering and Maintenance 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 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

<b>Evaporation Pond</b>	<b>Allowable Average Leakage Rate (in gallons)</b>
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
  - 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
  - 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
  - 4 The Manager, Compliance and Permitting will provide written notification and a proposed corrective action plan and schedule to the DRC within seven calendar days of discovery
  - 5 A calculation from the monitored leakage rate will be evaluated by the 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 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
  - 6 Defects in the liner will be repaired in accordance with the corrective action plan and schedule
  - 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
  - 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
  - 3 The QAM or the Manager, Compliance and Permitting 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
  - 5 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery.

**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
- 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 will provide notification to the Manager, Compliance and Permitting and the QAM
- 9 The QAM or Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 10 The Manager, Compliance and Permitting 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 will notify the QAM or the Manager, Compliance and Permitting
- 8 The Manager, Compliance and Permitting or QAM will provide verbal notification to the DRC within 24 hours of identification
- 9 The Manager, Compliance and Permitting 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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
- 7 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 8 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 9 The Manager, Compliance and Permitting 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 3 The Facility Operator or BAT Inspector will cease water management activities at the transfer pad
- 4 The Manager, Waste Disposal Operations 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 Manager, Compliance and Permitting will submit just cause in writing to the 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 Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8 The Manager, Compliance and Permitting 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

- 2 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 3 The Facility Operator or BAT Inspector will cease water management activities at the transfer facility
- 4 The Manager, Waste Disposal Operations 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 Manager, Compliance and Permitting will submit just cause in writing to the 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 Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8 The Manager, Compliance and Permitting 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 3 The Facility Operator or BAT Inspector will cease water management activities at the transfer facility
- 4 The Manager, Waste Disposal Operations 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 Manager, Compliance and Permitting will submit just cause in writing to the 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 Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4.5 Rail Rollover Facility:

##### 4.5.1 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

- 2 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 5 2 Water Level in Sump Above Grate

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 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 QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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

#### **4.6 Containerized Waste Storage Pad:**

##### **4.6.1 Water Above the Sump Grate**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

##### **4.6.2 Discrepancy in Exposed Storage Pad Integrity**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 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 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 8 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 9 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

**4 6 3 Improper Labeling or Storage of Waste**

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

**4.7 East Truck Unloading Area:****4 7 1 Troughs More Than Three Quarters Full**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide notification to the DRC within seven calendar days of discovery

**4 7 2 Discrepancy in Exposed Surface Integrity**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 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
- 7 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 8 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that repairs were not performed

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

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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

### 4.8 Intermodal Unloading Facility:

#### 4 8 1 Water Above the Sump Grate

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

**4 8 2 Discrepancy in Exposed Pad Integrity**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 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
- 7 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 8 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 9 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

**4 8 3 Improper Labeling or Storage of Waste**

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

**4.9 Intermodal Unloading Facility Lift Station****4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 10 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### **4.10 LARW Box Washing Facility:**

##### **4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 10 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

##### **4 10 2 Pipeline Cap from the Building Not Intact**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification

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

#### 4.10.3 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The vwill schedule repairs within 48 hours after receiving notification
- 4 Repairs will be completed within 10 working days of discovery or the
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### 4.10.4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

**4.11 Rail Wash Facility on Track No. 4:****4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 10 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

**4 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 notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Director of Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification.
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

**4 11 3 Discrepancy in Exposed Pad Integrity**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations

- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### **4.12 Rail Digging Facility:**

##### **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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

##### **4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 6 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 12 5 Discrepancy in Exposed Asphalt Pad and Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### **4.13 Decontamination Access Control Building:**

##### **4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

##### **4 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
- 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

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

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

#### 4.14 Intermodal Container Wash Building:

##### 4.14.1 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification

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

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The facility will be taken out of service
- 4 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 5 The Manager, Compliance and Permitting 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 14 5 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The affected bay(s) will be placed out of service
- 4 The Manager, Waste Disposal Operations 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
- 5 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 6 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

**4.15 Shredder Facility:****4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and 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 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

**4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

**4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 Place the facility out of service
- 4 The Manager, Waste Disposal Operations will 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 will notify the QAM and Manager, Compliance and Permitting

- 6 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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, together with the 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The facility will be placed out of service
- 4 The Manager, Compliance and Permitting will determine necessary sampling activities

#### 4 15 6 Facility Not Labeled for PCBs as Required

- 1 The Facility Operator or BAT Inspection will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 15 8 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations 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
- 3 Manager, of Compliance and Permitting will provide just cause in writing to the Director
- 4 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 5 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

#### 4 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
- 3 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting 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 Manager, Compliance and Permitting 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

## **4.16 Rotary Dump Facility**

### **4 16 1 Thaw Building**

#### **4.16.1 1 Discrepancy in Exposed Concrete Integrity**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### **4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### **4 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

- 2 The Manager, Waste Disposal Operations will notify the Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 16 2 Wash Building

##### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 An absorbent material will be placed along the curbing to deter water flow past the curb
- 4 The Manager, Waste Disposal Operations 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
- 5 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 6 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

##### 4 16 2 2 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director

- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### 4 16 2 3 Integrity Breach at Surface Seal Around Footing

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Facility Operator or BAT Inspector will place the Wash Building out of service
- 3 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 4 The Manager, Waste Disposal Operations 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
- 5 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 6 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 16 3 Rotary Building

##### 4 16 3 1 Discrepancy in Exposed Concrete Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

##### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and 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 free drainage is restored
- 7 If blockage cannot be removed or is not removed within the same working day, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 10 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The facility will be taken out of service
- 4 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 5 The Manager, Compliance and Permitting 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 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
- 3 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 will notify to the Manager, Compliance and Permitting of the desire to operate the facility using the Alternate Wastewater Management Area
- 7 The Manager, Compliance and Permitting 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that fluids were present within the leak detection system
- 10 The Manager, Compliance and Permitting 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 16 4 Alternate Wastewater Management Area (When Placed in Service and Locking Valve is in the "Open" Position)

4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 16 4 2 Visual Alarm at One or Both Storage Tanks

- 1 The Rotary Dump Facility will be placed out of service
- 2 Perform manual removal of water from the collection tank
- 3 If the water is not removed within the same working day, the Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 4 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 5 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 6 The Manager, Compliance and Permitting 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

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

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### **4.17 East Side Drainage System:**

##### **4 17 1 Stormwater Management System**

##### **4 17 1 1 Catchbasin Water Level Above Outlet Pipe**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 6 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

##### **4 17 1 2 Lift Sump Alarm Activated**

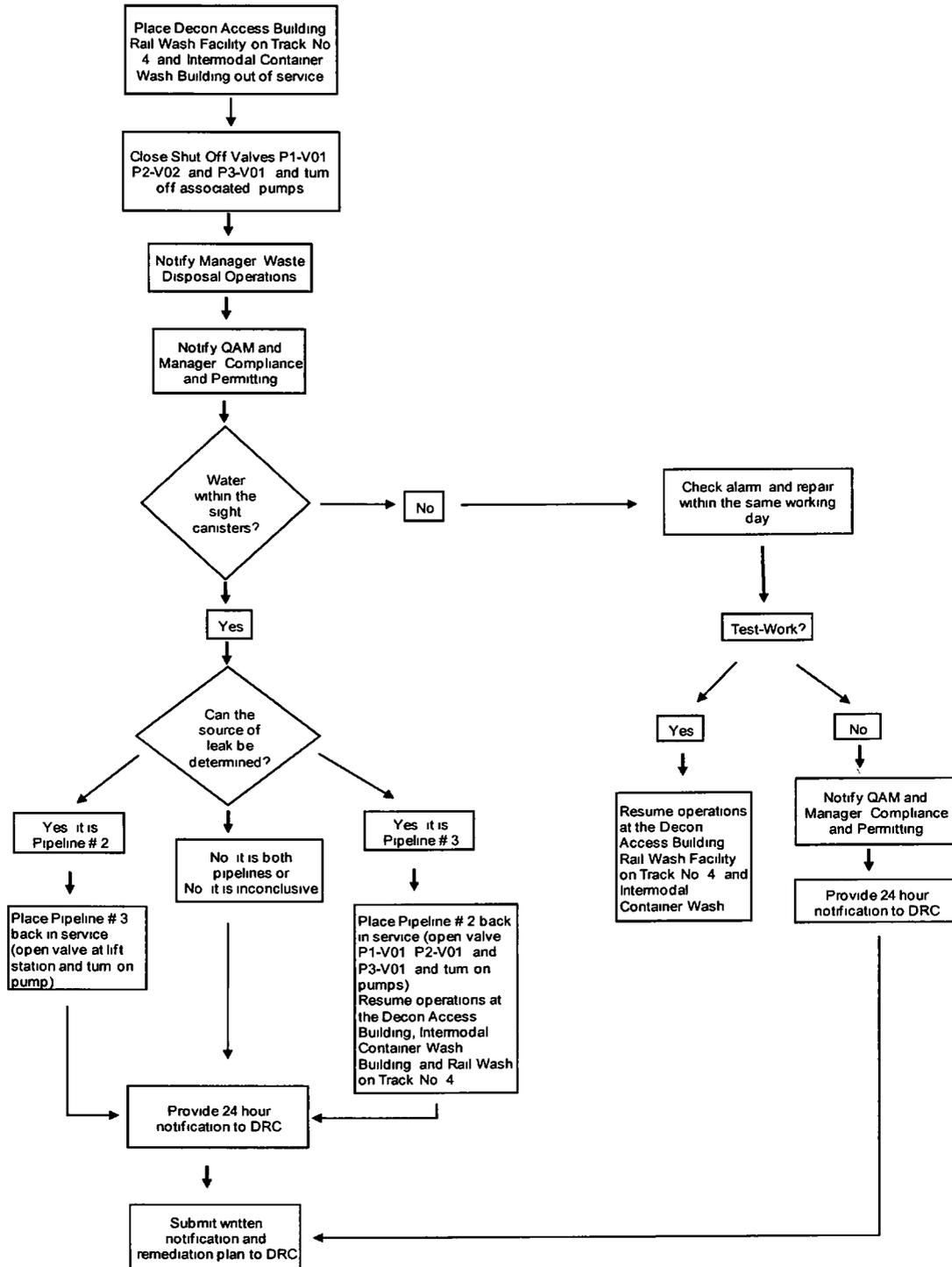
- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 Inspect the alarm system to determine if functioning properly
- 4 Inspect the sump pump(s) to determine 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 Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

4 17 2 East Side Drainage System Gray Water

4 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

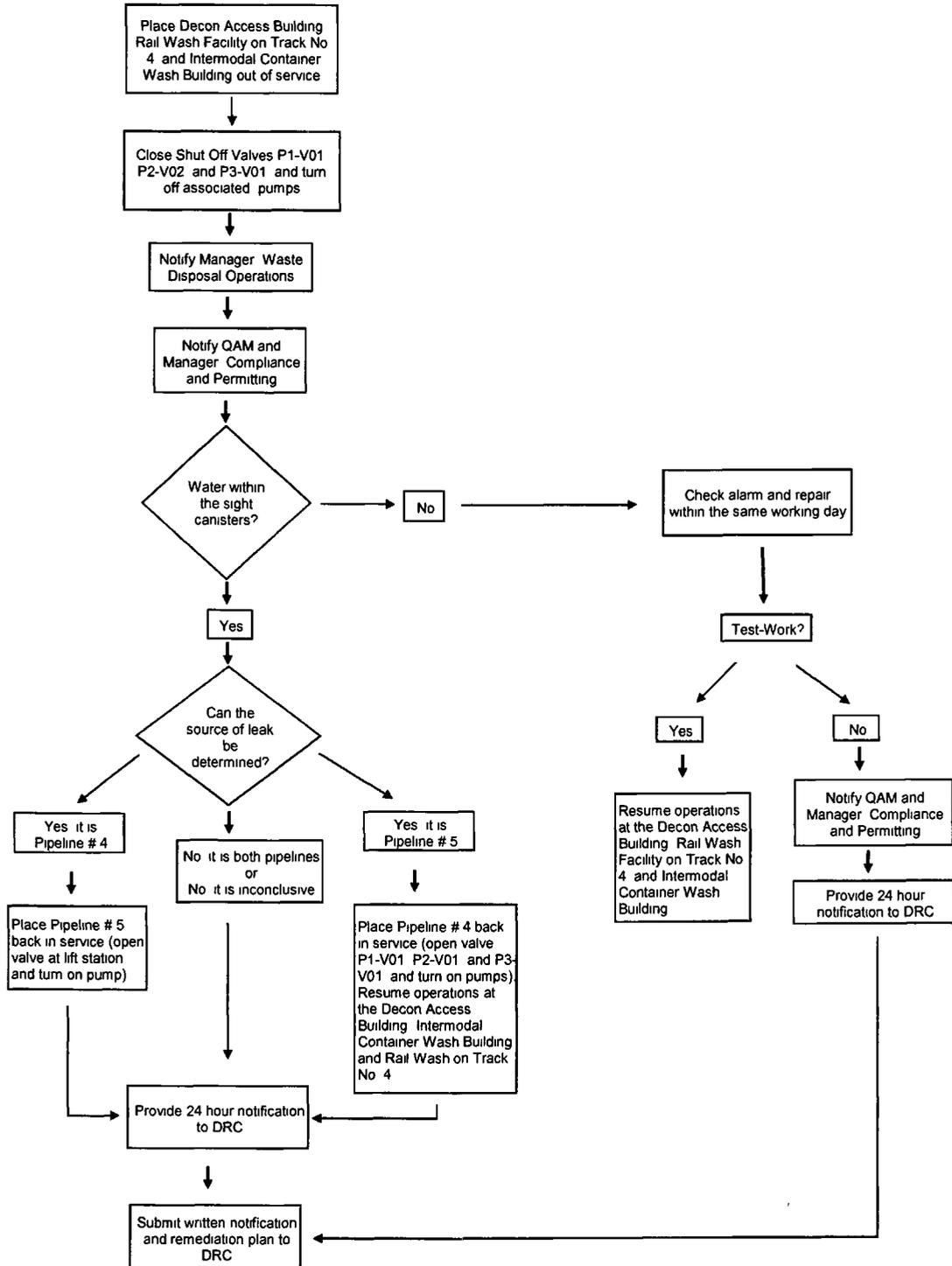
**Alarm Activated at Manhole 1**



4 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**



**4 18 2 3 Failure of the carrier pipe**

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 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 will notify the QAM and Manager, Compliance and Permitting and Manager, Engineering and Maintenance
- 4 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of confirmation and provide notification of manual water removal from affected facilities
- 5 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery
- 6 The 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 Professional Engineer
- 10 The facility will be placed back into service

**4.18 South Ditch****4 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
- 2 The Manager, Waste Disposal Operations will notify the QAM, Manager, Engineering and Maintenance, and Manager, Compliance and Permitting
- 3 The Manager, Engineering and Maintenance will schedule repairs within 48 hours after receiving notification
- 4 Repairs will be completed within 14 calendar days of discovery or the
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM, Manager, Engineering and Maintenance, and Manager, Compliance and Permitting
- 3 Manual removal of water will begin within the same working day
- 4 The Manager, Engineering and Maintenance 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
- 5 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 6 If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 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
- 2 The Manager, Waste Disposal Operations will notify the QAM, Manager, Engineering and Maintenance, and Manager, Compliance and Permitting
- 3 The Manager, Engineering and Maintenance will schedule repairs within 48 hours after receiving notification
- 4 Repairs will be completed within 14 calendar days of discovery or the
- 4 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 5 If repairs are not performed within 14 calendar days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 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
- 2 Debris removal will be completed within 48 hours of discovery or the
- 2 Manager, Compliance and Permitting will provide just cause in writing to the Director

- 3 If debris removal is not performed within 48 hours of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the debris removal was not performed
  - 4 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that the removal was not performed
- 4 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
  - 2 The Manager, Waste Disposal Operations will schedule manual water removal
  - 3 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
  - 4 The Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
  - 5 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### **4.19 LLRW Operations Building**

- 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
  - 2 The Manager, Waste Disposal Operations will 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 will notify the QAM and Manager, Compliance and Permitting
  - 4 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
  - 5 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery
- 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
  - 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting

- 3 Place the wastewater generating systems (restricted area of the building) out of service
- 4 The Manager, Waste Disposal Operations will 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 will notify the QAM and Manager, Compliance and Permitting
- 6 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification
- 7 The Manager, Compliance and Permitting 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 19 3 Presence of fluids in the leak detection system

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM, Manager, Compliance and Permitting, and Manager, Engineering and Maintenance
- 3 The wastewater generating systems (restricted area of the building) will be placed out of service
- 4 The Manager, Engineering and Maintenance will determine the cause of the alarm and schedule repairs as needed
- 5 The QAM or the Manager, Compliance and Permitting 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 Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

### 4.20 SRS DU Storage Building

#### 4 20 1 Discrepancy in Exposed Asphalt Integrity

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The Manager, Waste Disposal Operations 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, Compliance and Permitting will provide just cause in writing to the Director

- 5 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting 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 identification that repairs were not performed

#### 4 20 2 Evidence of container leakage, corrosion, or deterioration

- 1 The Facility Operator or BAT Inspector will notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and the Manager, Compliance and Permitting
- 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 Manager, Compliance and Permitting 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 Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of discovery

#### 4 20 3 Presence of water on the asphalt surface

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

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

#### 4 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 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 Director in accordance with that plan
- 3 The ancillary equipment will be taken out of service until the cause of the spill has been determined and repaired
- 4 Once the ancillary equipment has been repaired, 24 hour notification shall be provided to the Director prior to placing the system back into service

#### 4 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
- 3 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 4 The Manager, Waste Disposal Operations 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 Director prior to placing the system back into service
- 6 Repairs will be completed within 10 working days of discovery or the
- 6 Manager, Compliance and Permitting will provide just cause in writing to the Director
- 7 If repairs are not performed within 10 working days of discovery and just cause has not been provided to the Director, the QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of identification that the repairs were not performed
- 8 The Manager, Compliance and Permitting will provide written notification to the DRC within seven calendar days of identification that repairs were not performed

### **4.22 Contingency Actions for Qualitative BAT Performance Standards**

#### 4 22 1 Failure to complete inspections as required

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

#### 4 22 2 Failure to Comply with Waste Disposal Location Requirements

- 1 Notify the Manager, Waste Disposal Operations

- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of confirmation
- 4 The Manager, Compliance and Permitting 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 22 3 Disposal of Unauthorized Wastes

- 1 Notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC
- 4 The Manager, Compliance and Permitting will provide written notification in accordance with the Permittee's Radioactive Material License

#### 4 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 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 22 5 Failure to Complete a Portion of the Disposal Cell Within the Applicable Open Cell Time Limit

- 1 Notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery
- 4 The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery

**4 22 6 Failure to Comply with General Stormwater Management Requirements and Performance Criteria**

- 1 Notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery
- 4 The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery

**4 22 7 Failure to Comply with 11e (2) Waste Management and Storage Requirements**

- 1 Notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery
- 4 The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery

**4 22 8 Failure to Comply with LLRW Waste Management Requirements**

- 1 Notify the Manager, Waste Disposal Operations
- 2 The Manager, Waste Disposal Operations will notify the QAM and Manager, Compliance and Permitting
- 3 The QAM or the Manager, Compliance and Permitting will provide verbal notification to the DRC within 24 hours of discovery
- 4 The Manager, Compliance and Permitting will provide written notification and proposed corrective actions to the DRC within seven calendar days of discovery