Hazardous Waste Management
RCRA Permit NEVHW0025
December 2011

US Ecology Nevada, Inc.
Beatty, Nevada
EPA ID# NVT330010000

State of Nevada
Department of Conservation and Natural Resources
Division of Environmental Protection
Bureau of Waste Management

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RCRA PERMIT
FOR A HAZARDOUS WASTE MANAGEMENT FACILITY

Permittee:	**US Ecology Nevada, Inc.** **Beatty, Nevada 89003**	RENEWAL DECEMBER 2011
Facility EPA ID#:	**NVT330010000**	
Permit Number:	**NEVHW0025**	

This Permit is issued by the Nevada Division of Environmental Protection (NDEP) under the authority of Section 3006 of Resource Conservation and Recovery Act (RCRA) (40 CFR Part 271), Nevada Revised Statutes (NRS) 459.520 and Nevada Administrative Code (NAC) 444.842 through 444.8746 and 444.960. The State of Nevada has adopted 40 CFR Subpart A of Part 2, Subparts A and B of Part 124, and Parts 260 through 270 inclusive, by reference in the NAC at 444.8632 with exceptions listed at 444.86325 and as revised at 444.8633. This Permit is issued to US Ecology Nevada, Inc. (hereafter called the Permittee), to operate a commercial hazardous waste treatment, storage, and disposal facility located near Beatty, Nevada at latitude 36° 46' 9" N and longitude 116° 41' 23" W, summarily described as follows:

The facility is located on an 80-acre site, which is owned by the State of Nevada. In addition, the State of Nevada leases a 400-acre buffer zone surrounding the 80-acre site from the U.S. Bureau of Land Management. The facility consists of:

- Five (5) Container Storage Units;
- Five (5) PCB Storage Tanks;
- One (1) Leachate Storage Tank;
- One (1) Evaporation Tank;
- Five (5) Batch Stabilization Tanks (Pans 1-5);
- Three (3) Subtitle C Landfills consisting of Trench 10 (closed), Trench 11 with a design capacity of 2.36 million cubic yards, and Trench 12 with a design capacity of 1.66 million cubic yards.

The facility is required to perform groundwater monitoring, perform post-closure care and monitoring, and is under corrective action activities which are described in detail in the sections of this Permit (Sections 10 - 13). The Permittee must comply with all terms and conditions of this Permit. This Permit consists of the conditions contained herein, the Permit Application, and the applicable regulations contained in 40 CFR Parts 124, 260 through 266, and 270, and Sections 206, 212, and 224 of HSWA, which require corrective action for all releases of hazardous wastes or constituents from any solid waste management unit (SWMU) at a treatment , storage, or disposal unit seeking a Permit, regardless of the time at which waste was placed in such unit, as specified in the Permit. If there are conflicts between this Permit and the Permit Application, the Permit shall prevail. Applicable regulations are those that are in effect on the date of issuance of the Permit, in accordance with 40 CFR 270.32(c) and NAC 444.8632.

This Permit is based on the assumption that the information submitted in the Part A Permit Application dated October 29, 2009 and Part B Permit Application originally dated October 29, 2009, as modified by subsequent amendments dated April 22, 2010, June 2, 2010 and May 17, 2011 (hereafter referred to as the

Permit Application) is accurate and that the facility will be constructed, operated and closed as specified in the Permit Application and this Permit.

Any inaccuracies found in the submitted information may be grounds for the termination, revocation and reissuance, or modification of this Permit in accordance with 40 CFR 270.41, 270.42, 270.43, and NAC 444.8632 and for enforcement action. The Permittee must inform the Director of any deviation from or changes in the information in the application, which would affect the Permittee's ability to comply with the applicable regulations or Permit conditions. Failure to comply with any term or condition set forth in this Permit in the time or manner specified herein will subject the Permittee to possible enforcement action and penalties pursuant to NRS 459.565, 459.570, 459.585, and 459.595.

This Permit is effective as of **December 8th , 2011** and shall remain in effect until **December 8th, 2016** unless revoked and reissued under 40 CFR 270.41 and NAC 444.8632, terminated under 40 CFR 270.43 and NAC 444.8632, or continued in accordance with 40 CFR 270.51(a) and NAC 444.8632.

This Permit shall be reviewed by the Director five years after the date of Permit issuance or reissuance and shall be modified as necessary, as provided in NRS 459.520 (4) and 40 CFR 270.50 (d).

12/8/11

R. Eric Noack
Chief, Bureau of Waste Management

Date

P:\BWM\HW Permits\American Ecology Inc (TSD)\Current and Renewal Permit\2011 Permit Renewal\2011 Final RCRA Permit\Signature Page.doc

1. SUMMARY

The Permittee is a commercial hazardous waste Treatment, Storage and Disposal Facility (TSDF). The Permittee may store, treat and dispose of all waste identified in the *Part A Application* and managed as identified in the *Part B Application* which are adopted by reference and are attachments to this Permit. Storage of waste is identified in Permit Sections 3 and 4 (Container Management and Tank Storage), Tank Treatment is identified in Permit Section 5, and Land Disposal is identified in Permit Section 7 (landfill). The facility also accepts waste that may be subject to RCRA Subpart AA, BB and CC with requirements identified in Permit Section 9 (Organic Air Emissions Conditions for Tanks & Containers). All regulations cited in this Permit refer to regulations in effect on the date of issuance of this Permit. The Permittee is to maintain compliance with the conditions contained in this Permit and any self-implementing regulations promulgated after issuance.

1.1. EFFECT OF PERMIT

The Permittee is authorized to treat, store, and dispose of on-site hazardous waste in accordance with the conditions of this Permit and its attachments. Any treatment, storage, or disposal of hazardous waste not authorized in this Permit is prohibited. Subject to 40 CFR 270.4, compliance with this Permit generally constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA, NRS 459.400 through 459.600, NAC 444.842 through 444.8746, NAC 444.960, and with HSWA. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 106(a), 104, 107 or 301(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), NRS 459.400 through NRS 459.600, or any other law providing for protection of public health or the environment. *[40 CFR 270.4, 270.30(g)]*

The State of Nevada has adopted 40 CFR Subpart A of Part 2, Subparts A and B of Part 124, Parts 260 through 270 inclusive, by reference in the NAC at 444.8632 with exceptions listed at 444.86325 and as revised at 444.8633. Therefore, all references to 40 CFR in this Permit shall be interpreted to include reference to NAC 444.8632.

1.2. PERMIT ACTIONS

1.2.1. Permit Modification, Revocation and Reissuance, and Termination

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

[40 CFR 270.4(a) and 270.30(f)]

1.2.2. Permit Renewal

This Permit may be renewed as specified in 40 CFR 270.30(b) and Permit Condition 1.5. 3. Review of any application for a permit renewal shall consider improvements in the state of control and measurement technology, as well as changes in applicable regulations.

[40 CFR 270.30(b), HSWA Sec. 212]

1.3. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

1.4. DEFINITIONS

For purposes of this Permit, terms used herein shall have the same meaning as those in 40 CFR Parts 124, 260, 264, 266, 268, and 270, unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. For purposes of this Permit, the definitions listed below will apply:

1.4.1. Administrator

The Administrator of the Nevada Division of Environmental Protection (NDEP) or his/her designee or authorized representative.

1.4.2. Area of Concern (AOC)

Any area having a probable release of a hazardous waste or hazardous constituent regardless of whether they are associated with a specific solid waste management unit (SWMU) and is determined by the Director to pose a current or potential threat to human health or the environment.

1.4.3. Certified Laboratory

A laboratory that has been approved by the Director to perform specific analyses referenced in NRS 459.500.

1.4.4. Closure Plan

The plan for closure prepared in accordance with the requirements of 40 CFR 264.112.

1.4.5. Current Closure Cost Estimate

The most recent of the estimates prepared in accordance with 40 CFR 264.142 (a), (b), and (c).

1.4.6. Post-Closure Plan

The plan for post-closure care prepared in accordance with the requirements of 40 CFR 264.117 through 40 CFR 264.120.

1.4.7. Current Post-Closure Cost Estimate

The most recent of the estimates prepared in accordance with 40 CFR 264.144 (a), (b), and (c).

1.4.8. Compliance Period

The number of years equal to the active life of the unit prior to the Director's approval of certification of closure and subsequent post-closure period.

1.4.9. Contamination

The presence of any hazardous constituent in a concentration which exceeds the naturally occurring concentration of that constituent in areas not affected by the operations of the facility.

1.4.10. Corrective Action

May include all corrective actions necessary to protect human health and the environment for all releases of hazardous waste or hazardous constituents at the facility, regardless of the time at which waste was placed in the unit, as required under 40 CFR 264.101. Corrective action may address releases to air, soil, surface water sediment, groundwater, or subsurface gas.

1.4.11. Director

The Director of the Nevada Department of Conservation and Natural Resources (DCNR) or his/her designee or authorized representative.

1.4.12. Division

The Nevada Division of Environmental Protection (NDEP), including personnel thereof authorized by the Administrator to act on behalf of the Division.

1.4.13. Extent of Contamination

The horizontal and vertical area in which the concentrations of hazardous constituents in the environmental media being investigated are above the naturally occurring concentration of that constituent in areas not affected by the operations of the facility.

1.4.14. Facility

Includes all contiguous property and structures, other appurtenances, and improvements on the property, used for treatment, storage or disposal of hazardous waste. For the purpose of implementing corrective action under 40 CFR 264.100 and 40 CFR 264.101, the facility includes all contiguous property under the control of the operator seeking a permit under Subtitle C of RCRA.

1.4.15. Hazardous Constituents

Those substances listed in 40 CFR 261 Appendix VIII and/or 40 CFR Part 264 Appendix IX.

1.4.16. Hazardous Waste Management Unit (HWMU)

A contiguous area of land on or in which hazardous waste is managed, or the largest area in which

there is significant likelihood of mixing hazardous waste constituents in the same area. Examples of hazardous waste management units include surface impoundments, waste piles, land treatment areas, landfill cells, incinerators, tanks and their associated piping and underlying containment system, and container storage areas. A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are managed**.**

1.4.17. Interim Measures

Actions necessary to minimize or prevent the further migration of contaminants and limit actual or potential human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented.

1.4.18. Land Disposal

Placement in or on the land except for a Corrective Action Management Unit (CAMU) and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, underground mine or cave, or concrete vault or bunker intended for disposal purposes.

1.4.19. Landfill

Any disposal at the facility or part of the facility where hazardous waste is or was placed in or on the land and is to be left in place.

1.4.20. Post Closure Care Period

A thirty year period beginning when a hazardous waste management unit is certified as closed and during which time the Permittee shall be required to maintain, monitor, and report in accordance with the appropriate requirements of 40 CFR 264 Subparts F, K, L, M, N, and X. The post closure care period is unit specific and may be more or less than thirty years. The Director may modify the post closure care period applicable to a unit if it is found that an extended or reduced period is sufficient to protect human health and the environment.

1.4.21. Post-Closure Plan

The plan for post-closure care prepared in accordance with the requirements of 40 CFR 264.117 through 264.120.

1.4.22. Qualified Professional Engineer

A person who by reason of his/her professional education and practical experience is granted a license by the Nevada State Board of Professional Engineers and Land Surveyors to practice professional engineering.

1.4.23. Release

Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste or hazardous constituents.

1.4.24. Remediation Waste

All solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris, that are managed for implementing cleanup. *[40 CFR 260.10]*

1.4.25. Schedule of Compliance

A schedule of remedial measures included in this Permit, including an enforceable sequence of interim requirements (for example, actions, operations, or milestone events) leading to compliance with the Resource Conservation and Recovery Act and/or the State of Nevada Hazardous Waste Management Regulations.

1.4.26. Solid Waste

Any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended (86 Stat. 880), or source, special nuclear, or byproduct material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923).

1.4.27. Solid Waste Management Unit (SWMU)

Any unit which has been used for the treatment, storage, or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste. RCRA hazardous waste management units are also solid waste management units. SWMUs include areas that have been contaminated by routine and systematic releases of hazardous waste or hazardous constituents, excluding one-time accidental spills that are immediately remediated and cannot be linked to solid waste management activities (e.g. product or process spills).

1.4.28. Temporary Unit (TU)

Any temporary tanks and/or container storage areas used solely for treatment or storage of hazardous remediation wastes during remedial activities required under 40 CFR 264.101 or RCRA Section 3008(h). Designated by the Director, such units must conform to specific standards as specified in 40 CFR 264.553.

1.4.29. Unit

Includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank, container storage area, wastewater treatment unit, elementary neutralization unit, or recycling unit.

1.5. DUTIES AND REQUIREMENTS

1.5.1. Duty to Comply

The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an Emergency Permit (see 40 CFR 270.61). Any Permit noncompliance, other than noncompliance authorized by an Emergency Permit, constitutes a violation of RCRA and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. *[40 CFR 270.30(a)]*

1.5.2. Compliance Schedules

Any schedule of compliance established subsequent to the issuance of this Permit shall be adopted by reference as a condition of Permit compliance as if fully set forth herein.

1.5.3. Duty to Reapply

If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee shall submit a complete application for a new Permit at least 180 days prior to Permit expiration. *[40 CFR 270.10(h), 270.30(b)]*

1.5.4. Permit Expiration

Pursuant to NRS 459.520 (4), this Permit shall be effective for a fixed term not to exceed five (5) years. As long as the Director is the Permit-issuing authority, this Permit and all conditions herein will remain in effect beyond the Permit's expiration date, if the Permittee has submitted a timely, complete application (see 40 CFR 270.10, 270.13 through 270.29) and, through no fault of the Permittee, the Director has not issued a new Permit, as set forth in 40 CFR 270.51.

1.5.5. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit. *[40 CFR 270.30(c)]*

1.5.6. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures, as are reasonable, to prevent significant adverse impacts on human health or the environment. *[40 CFR 270.30(d)]*

1.5.7. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision

requires the operation of back-up or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of this Permit. *[40 CFR 270.30(e)]*

1.5.8. Permit Actions

This Permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any Permit condition. *[40 CFR 270.30(f)]*

1.5.9. Property Rights

This Permit does not convey any property rights of any sort, nor any exclusive privilege. *[40 CFR 270.30(g)]*

1.5.10. Duty to Provide Information

The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit. *[40 CFR 264.74(a), 270.30(h)]*

1.5.11. Inspection and Entry

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

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

1.5.12. Monitoring and Records

1.5.12.1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261 or an equivalent method approved by the Director. Laboratory methods must be those specified in the current edition (and its current update) of EPA manual SW-846: Test Methods for Evaluating Solid Waste, Physical/Chemical Methods- Standard Methods of Wastewater Analysis, or an equivalent method, as specified in the Waste Analysis Plan, Section 8 of the Permit Application. *[40 CFR 270.30(j)(1)]*

1.5.12.1.1. Both groundwater and soil samples for regulatory monitoring and remedial efforts must be

sent to a Nevada-certified laboratory for analyses. As a permitted hazardous waste management facility, the on-site laboratory is not required to be state-certified if the laboratory is solely utilized for the purposes of on-site management of wastes.

[NRS 445A.425 and .427]

1.5.12.2. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, the certification required by 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application. In addition, the Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations for the active life of the facility and throughout post-closure. These periods may be extended by request of the Director at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility. *[40 CFR 264.74(b) and 270.30(j)(2)]*

1.5.12.3. Records of monitoring information shall include: *[40 CFR 270.30(j)(3)]*

1. The dates, exact place, and times of sampling or measurements;
2. The individuals who performed the sampling or measurements;
3. The dates analyses were performed;
4. The individuals who performed the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

1.5.13. Signatory Requirement

All applications, reports, or information submitted to or requested by the Director, his designee, or authorized representative, shall be signed and certified in accordance with 40 CFR 270.11.

[40 CFR 270.30(k)]

1.5.14. Reporting Requirements

1.5.14.1. Reporting Planned Changes

The Permittee shall give notice to the Director, as soon as possible, of any planned physical alterations or additions to the permitted facility. *[40 CFR 270.30(l)(1)]*

1.5.14.2. Reporting Anticipated Non-Compliance

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity, which may result in noncompliance with Permit requirements.

[40 CFR 270.30(l)(2)]

1.5.14.3. Certification of Construction or Modification

The Permittee may not commence treatment, storage or disposal of hazardous waste in any modified or newly constructed portion of the facility until:

1. The Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a qualified Professional Engineer stating that the facility has been constructed or modified in compliance with the Permit; and *[40 CFR 270.30(l)(2)(i)]*

2. (A) The Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the Permit; or *[40 CFR 270.30(l)(2)(ii)(A)]*

   (B) Within 15 calendar days of the date of submission of the letter in Section 1.5.14.3.1 of this Permit, if the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste. *[40 CFR 270.30(l)(2)(ii)(B)]*

1.5.14.4. Transfer of Permits

This Permit is not transferable to any person, except after notice to the Director. The Director may require modification or revocation and reissuance of the Permit to change the name of the Permittee and incorporate such other requirements as may be necessary under RCRA. Before transferring ownership or operation of the facility during its operating life or during its post-closure period, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270, NAC 444.842 through NAC 444.8746, NAC 444.960, and this Permit. *[40 CFR 270.30(l)(3), 40 CFR 264.12(c), 40 CFR 270.40]*

1.5.14.5. Monitoring Reports

Monitoring results shall be reported at the intervals specified elsewhere in this Permit or as required by a compliance schedule issued pursuant to Permit Condition 1.5.2.

[40 CFR 270.30(l)(4)]

1.5.14.6. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit or issued as an enforcement action, shall be submitted no later than 14 calendar days following each schedule date.

[40 CFR 270.30(l)(5)]

1.5.14.7. Twenty-Four Hour Reporting

1.5.14.7.1. The Permittee shall report to the Director any noncompliance which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. The report shall include the following:

1. Information concerning release of any hazardous waste that may cause an endangerment

to public drinking water supplies.

2. Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management facility which could threaten the environment or human health.

1.5.14.7.2. The description of the occurrence and its cause shall include:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident;
4. Name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

1.5.14.7.3. A written submission shall also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Director may waive the five-day written notice requirement in favor of a written report within 15 days. *[40 CFR 270.30(l)(6)]*

1.5.14.8. Manifest Discrepancy Report

If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved within fifteen days, the Permittee must submit a letter report, including a copy of the manifest, to the Director. (See 40 CFR 264.72) *[40 CFR 270.30(l)(7)]*

1.5.14.9. Unmanifested Waste Report

A report must be submitted to the Director within 15 calendar days of receipt of unmanifested hazardous waste. (See 40 CFR 264.76) *[40 CFR 270.30(l)(8)]*

1.5.14.10. Biennial Report

A Biennial Report must be submitted by March 1st of each even numbered year, covering facility activities during the previous calendar year and the information in 40 CFR 264.75.

[40 CFR 270.30(l)(9)]

1.5.14.11. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition 1.5.14.7.2. *[40 CFR 270.30(l)(10)]*

1.5.14.12. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit application, or submitted incorrect information in a Permit application or in any report to the Director, the Permittee shall promptly submit such facts or information. *[40 CFR 270.30(l)(11)]*

1.5.15. Information Repository

The Permittee shall maintain at the facility the information repository created in support of all Permit applications, renewals and modifications pursuant to 40 CFR 124.33(c) through (f) for the life of the facility. *[40 CFR 270.30(m)]*

1.6. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DIRECTOR

All reports, notifications, or other submissions required by this Permit must be sent to the addressee shown below and must be **received** by the specified due date:

RCRA Permitting Branch Supervisor
Bureau of Waste Management
Nevada Division of Environmental Protection
901 S. Stewart St., Suite 4001
Carson City, NV 89701-5249

1.7. CONFIDENTIAL INFORMATION

In accordance with 40 CFR 270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

1.8. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until closure is completed and certified by a qualified Professional Engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by 40 CFR 264.13 and this Permit
2. Inspection Schedules, as required by 40 CFR 264.15(b)(2) and this Permit
3. Personnel Training documents and records, as required by 40 CFR 264.16(d) and this Permit
4. Contingency Plan, as required by 40 CFR 264.53(a) and this Permit
5. Operating Record, as required by 40 CFR 264.73 and this Permit
6. Closure Plan, as required by 40 CFR 264.112(a) and this Permit
7. Post-closure Plan, as required by 40 CFR 264.118(a) and this Permit

8. Annually-adjusted cost estimate for facility closure & post-closure, as required by 40 CFR 264.142(d) & 264.144(d) respectively and this Permit
9. Information Repository as required by 40 CFR 270.30(m) and this Permit
10. All Groundwater Monitoring Records inclusive of installation details for all wells required by this Permit or otherwise
11. Corrective Action Plans and Reports
12. All instances of implementation of the Contingency Plan
13. All correspondence related to changes or modifications to this Permit
14. Unusual Occurrence Reports documenting (examples only): all manifest discrepancies, deficiencies found as a result of an inspection, all releases whether contained by secondary containment or not, all injuries to personnel, all activations of the alarm system, any non-compliance with this Permit, etc.

1.9. COMPLIANCE SCHEDULES

Refer to specific sections of this Permit for any compliance schedules established by the Director.

2. SUMMARY

The Permittee is required to operate the facility consistent with the accepted practices detailed in this and other sections of the Permit and Permit Application in order to minimize the possibility of releases to the environment or harm to either employees or the public at large.

2.1. DESIGN AND OPERATION OF FACILITY

The Permittee shall construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment as required by 40 CFR 264.31 and in accordance with the management practices and procedures specified in the permit application.

2.2. REQUIRED NOTICES

2.2.1. Hazardous Waste Imports

The Permittee shall notify the Director in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source, as required by 40 CFR 264.12 (a). Notice of subsequent shipments of the same waste from the same foreign source is not required.

2.2.2. Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), the Permittee must inform the generator in writing that they have the appropriate Permits, and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. *[40 CFR 264.12(b)]*

2.3. GENERAL WASTE ANALYSIS

The Permittee shall comply with the waste analysis requirements of 40 CFR 264.13 and follow the Waste Analysis Plan procedures of Permit Application Section 8 and the conditions listed below:

2.3.1. The Permittee shall verify the analysis of each waste stream annually as part of its quality assurance program, in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846 or equivalent methods as specified in the Waste Analysis Plan and as approved by the Director. At a minimum, the Permittee shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee shall inform the laboratory in writing that it must use analytical methods and operate under the waste analysis conditions set forth in this Permit.

2.3.2. Waste Stream Review

The Permittee shall submit to the Director for review, all new waste streams, including solid wastes, submitted to the Permittee for treatment, storage and/or disposal. The submitted information shall contain the following documents:

1. A completely filled-out Waste Disposal Information (WDI) Form, including any Land Disposal Certification (LDR), signed by the generator or authorized agent.
2. Technical Review Sheet (TRS)
3. Other information as requested by the Director

2.4. SECURITY

The Permittee shall comply with the security provisions of 40 CFR 264.14 and the Security Plan in Permit Application Section 4.

2.5. GENERAL INSPECTION REQUIREMENTS

The Permittee shall comply with the Inspection Plan requirements of 40 CFR 264.15 and follow the Inspection Plan procedures in the Permit Application Section 5. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 40 CFR 264.15(c). Records of all inspection shall be kept, as required by 40 CFR 264.15(d).

2.6. PERSONNEL TRAINING

The Permittee shall conduct personnel training, as required by 40 CFR 264.16. The Permittee shall follow the Personnel Training Program procedures in the Permit Application Section 6 and maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

2.6.1. Training Program

2.6.1.1. Facility Personnel

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Permit. The Permittee must ensure that this program includes all the elements described in the document required under 40 CFR 264.16(d)(3).

[40 CFR 264.16(a)(1)]

2.6.1.2. Instructor Qualifications and Training Content

The training program must be directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *[40 CFR 264.16(a)(2)]*

2.6.1.3. Emergency Response

At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

[40 CFR 264.16(a)(3)]

1. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
2. Key parameters for automatic waste feed cut-off systems;
3. Communications or alarm systems;
4. Response to fires or explosions;
5. Response to ground-water contamination incidents; and
6. Shutdown of operations.

2.6.1.3.1. For facility employees that receive emergency response training pursuant to Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.120(p)(8) and 1910.120(q), the facility is not required to provide separate emergency response training pursuant to this section, provided that the overall facility training meets all the requirements of 40 CFR 264.16 and this permit. *[40 CFR 264.16(a)(4)]*

2.6.2. Training Schedule

Facility personnel must successfully complete the program required in Permit Condition 2.6.1 within six months after the date of their employment or assignment to the facility, or to a new position at the facility, whichever is later. Newly hired employees must not work in unsupervised positions until they have completed the training requirements in Permit Conditions 2.6.1.1 through 2.6.1.3, above.

[40 CFR 264.16(b)]

2.6.3. Annual Review

Facility personnel must take part in an annual review of the initial training required in Permit Condition 2.6.1. *[40 CFR 264.16(c)]*

2.6.4. Documentation

The Permittee shall maintain the following documents and records at the facility:

[40 CFR 264.16(d)]

1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
2. A written job description for each position listed under (1), above. This description may be consistent in its degree of specificity with descriptions of other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under (1), above.

4. Records that document that the training or job experience required under Permit Conditions 2.6.1, 2.6.2 and 2.6.3 has been given to, and completed by, facility personnel.

2.6.5. Record Keeping

Training records on current personnel must be kept until closure of the facility; training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

[40 CFR 264.16(e)]

2.7. SPECIAL PROVISIONS

2.7.1. Special Provisions for Ignitable, Reactive, or Incompatible Waste

The Permittee shall comply with the requirements of 40 CFR 264.17 and follow the procedures for handling ignitable, reactive, and incompatible wastes in Sections 9.2.5, and 9.2.6 of the Container Management Plan and Section10.7 of the Tank Systems Report in the Permit Application.

2.7.2. Special Provisions for State-Hazardous Waste

2.7.2.1. The Permittee shall manage all waste that is designated as hazardous waste in the state of its origin (e.g., California) [See NAC 444.843.2(c)] as hazardous waste. This shall be done in accordance with the terms of this permit, upon acceptance, when brought to the facility and during storage and/or treatment while at the facility.

2.7.2.2. Waste originally designated as hazardous waste in its state of origin shall be manifested as hazardous waste when shipped offsite.

2.8. RESTRICTED WASTES

The Permittee is not authorized to receive, treat, store, dispose of, or otherwise manage the following:

1. Any radioactive material that is not exempt from regulation and licensing or is not expressly authorized for disposal under this Permit or any radioactive or nuclear waste material, which requires specific licensing or permitting under any other rules of state or federal authorities for disposal or transshipment;
2. Compressed gases (not to include aerosol containers) or pressurized gases, including those contained in compressed gas cylinders;
3. Class 1, Division 1.1 or 1.2, or forbidden explosives (40 CFR Part 173.50), or any explosive material, as defined by USDOT under 49 CFR Part 173;
4. Biological Agents, Etiologic Agents or infectious wastes;
5. Bulk liquids for direct disposal, or containerized liquids (except lab packs) for direct disposal; or bulk hazardous liquids to which absorbents have been added (Use of liquids as

dust suppression in accordance with Permit Application Section 11.3.10 is not considered disposal under this section);

6. Reactive material as defined in 40 CFR Part 261.23, that is not treated to meet the requirements of 40 CFR Part 268 prior to disposal;
7. Liquid organic peroxides with concentration exceeding 5% by volume;

[NDEP-USEN e-mail dated January 9, 2008]

8. Containerized liquids (Lab packs) with biodegradable absorbents (40 CFR 264.316(b).

2.9. PREPAREDNESS AND PREVENTION

2.9.1. Required Equipment

At a minimum, the Permittee shall maintain at the facility the equipment as required by 40 CFR 264.32 and as set forth in the Contingency Plan in the Permit Application Section 7.

2.9.2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified in Permit Condition 2.9.1, as necessary, to assure its proper operation in time of emergency, as required by 40 CFR 264.33.

2.9.3. Access to Communications or Alarm System

The Permittee shall maintain access to the communications or alarm system, as required by 40 CFR 264.34.

2.9.4. Required Aisle Space

The Permittee shall maintain a minimum of three (3) feet of aisle space between container rows to facilitate inspections and the movement of emergency equipment and personnel. *[40 CFR 264.35]*

2.9.5. Arrangements with Local Authorities

The Permittee shall maintain arrangements with State and local authorities as required by 40 CFR 264.37 and as specified in Permit Application Section 7. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the Operating Record.

2.10. CONTINGENCY PLAN

2.10.1. Implementation of Plan

The provisions of the Contingency Plan in Permit Application Section 7 must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. *[40 CFR 264.51(b)]*

2.10.2. Copies of Plan

A copy of the Contingency Plan and all revisions to the plan must be: *[40 CFR 264.53]*

1. Maintained at the facility; and
2. Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

2.10.3. Amendments to Plan

The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by 40 CFR 264.54.

2.10.4. Emergency Coordinator

A qualified emergency coordinator shall be available at all times in case of an emergency, as required by 40 CFR 264.55.

2.10.4.1. The Emergency Coordinator shall comply with the requirements of 40 CFR 264.56.

2.11. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72 and 264.76 and NAC 444.8666 and follow the procedures in Permit Application Section 8.6.5 consistent with:

1. Signing and dating each copy of the manifest to certify that the hazardous waste covered by the manifest was received[1];
2. Noting any significant discrepancies in the manifest as defined below, on each copy of the manifest;
   a. Waste Types - Manifest discrepancies between the type of hazardous waste designated on the manifest or shipping paper, and the type of hazardous waste the facility actually receives, or obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper or:
   b. Waste Quantities - For bulk waste, variations greater than 10 percent in weight, for batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload.
3. Immediately give the transporter at least one copy of the signed manifest;
4. Within 30 days after the delivery, send a copy of the manifest to the generator; and
5. Retain at the facility a copy of each manifest for at least three years from the date of delivery.
6. The Permittee shall comply with the manifest discrepancies requirements of 40 CFR 264.72 by reconciling the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after receiving the waste, the Permittee must immediately submit to the Director a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper.

[1] [*Comment:* The Director does not intend that the Permittee (who performs procedures under 40 CFR 264.13(c)) perform that analysis before signing the manifest and returning it to the transporter. §264.72(b), however, requires reporting an unreconciled discrepancy discovered during later analysis.]

2.12. RECORDKEEPING AND REPORTING

In addition to the recordkeeping, reporting and fee requirements specified elsewhere in this Permit, The Permittee shall do the following:

2.12.1. Operating Record

2.12.1.1. The Permittee shall maintain a written operating record at the facility as required in 40 CFR 264.73.

2.12.1.2. The Permittee shall maintain at the facility copies of waste minimization documents required in Permit Section 8 and shall make them available to any authorized representative of NDEP or USEPA conducting an inspection.

2.12.2. Quarterly Volume Fee

The Permittee shall submit to the Director a detailed volume fee breakdown report along with the quarterly volume fees due and the wire transfer information within 30 days after the end of each calendar quarter. *[NAC 444.8452]*

2.12.3. Annual Operating fee

The Permittee shall pay the annual operating fee on or before March 1 of each year. *[NAC 444.845]*

2.12.4. Annual Report

In addition to complying with the biennial reporting requirements of 40 CFR 264.75, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of each year with the following information:

1. The EPA identification number, name, and address of the facility;
2. The calendar year covered by the report;
3. The EPA identification number of each generator from which the Permittee received a waste stream during the year. In addition, the name and address of foreign generators shall be provided for all imported shipments.
4. A description and quantity of each waste stream in tons and cubic feet received at the facility. This information must be listed by EPA identification number for each generator.
5. The method of treatment, storage, and/or disposal for each waste stream.
6. The most recent closure and post-closure cost estimates (including complete cost itemization).
7. A description of the waste minimization efforts undertaken during the year to reduce the volume and toxicity of wastes generated by the Permittee.
8. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years.
9. Unusual occurrence reports covering all rejected shipments during the year and copies of the

quarterly reviews of these reports which is required by the Waste Analysis Plan (WAP). Any letters sent to a generator/broker during the year as required by the WAP must also be included.

10. The results of tank integrity assessments completed during the year.
11. Reports, as applicable, required under 40 CFR 264.1065 pertaining to all equipment subject to Subpart BB standards.
12. The certification signed by the operator of the facility or his authorized representative.

2.13. GENERAL CLOSURE REQUIREMENTS

2.13.1. Performance Standard

The Permittee shall close the facility, as required by 40 CFR 264.111 and in accordance with the approved Closure Plan.

2.13.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan in accordance with 40 CFR 264.112(c), whenever necessary.

2.13.3. Notification of Closure

The Permittee shall notify the Director in writing at least 60 days prior to the date on which the facility expects to begin partial or final closure of the facility, as required by 40 CFR 264.112(d).

2.13.4. Time Allowed for Closure

After receiving the final volume of hazardous waste in any or all of the regulated units, the Permittee shall treat, remove from the unit or facility, or dispose of on-site all hazardous wastes and shall complete closure activities, in accordance with 40 CFR 264.113 and the schedules specified in the Closure Plan in Permit Application Section 15 or 16 as determined by the Director.

2.13.5. Disposal or Decontamination of Equipment, Structures, and Soils

The Permittee shall decontaminate or ship offsite all contaminated equipment, structures, and soils, as required by 40 CFR 264.114 and the approved Closure Plan. In the event not all structures, soils or equipment can be shipped offsite, the Permittee shall close the facility in accord with 40 CFR 264 Subpart N.

2.13.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan in Permit Application Section 15 or 16, as required by 40 CFR 264.115.

2.13.7. Survey Plat

The Permittee shall submit to the local land use authority, and to the Director, upon submission of the certification of closure of each hazardous waste disposal unit, a survey plat indicating the waste disposal locations and dimensions, with respect to permanently surveyed benchmarks, as required by 40 CFR 264.116.

2.14. GENERAL POST-CLOSURE REQUIREMENTS

2.14.1. Post-Closure Care Period

The Permittee shall begin post-closure care for each landfill after completion of closure of the unit and continue post-closure care for at least 30 years after that date. Post-closure care shall be in accordance with 40 CFR 264.117 and as required in the Post-Closure Plan in Permit Application Section 17.

2.14.2. Post-Closure Care Security

The Permittee shall maintain security at the facility during the post-closure care period in accordance with 40 CFR 264.117(b) and as required in the Post-Closure Plan in Permit Application Section 17.

2.14.3. Amendment to Post-Closure Plan

The Permittee shall amend the Post-Closure Plan in accordance with 40 CFR 264.118(d), whenever necessary.

2.14.4. Post-Closure Notices

2.14.4.1. No later than 60 days after certification of closure of each hazardous waste disposal unit, the Permittee shall submit records of the type, location, and quantity of hazardous waste disposed of within each cell or disposal unit, in accordance with 40 CFR 264.119(a).

2.14.4.2. Within 60 days of certification of closure of each hazardous waste disposal unit, the Permittee shall submit a request to the Director and the Nevada Division of State Lands to record a notation on the deed (or other instrument normally examined during title search regarding the facility property), in accordance with 40 CFR 264.119(b)(1).

2.14.4.3. The Permittee shall request and obtain a permit modification prior to post-closure removal of hazardous wastes, hazardous waste residues, liners, or contaminated soils, in accordance with 40 CFR 264.119(c).

2.14.5. Certification of Completion of Post-Closure Care

The Permittee shall certify that the post-closure care period was performed in accordance with the specifications in the Post-Closure Plan in Permit Application Section 17, as required by 40 CFR 264.120.

2.15. FINANCIAL REQUIREMENTS FOR CLOSURE AND POST CLOSURE

The Permittee shall comply with the conditions in Permit Section 14 for Financial Assurance requirements and cost estimates.

2.16. LIABILITY REQUIREMENTS

The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 (a) and (b), and with Permit Section 14.

2.17. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee shall comply with 40 CFR 264.148, whenever necessary.

2.18 COMPLIANCE SCHEDULE

Reserved

3. SUMMARY

The Permittee is allowed to store waste in containers subject to the terms and conditions of this Permit as described in this Section. Containers are managed in the areas noted in the Container Management Report (Permit Application Section 9). Both liquids and solids managed in containers are accepted and stored while awaiting treatment, disposal, or off-site shipment. No treatment of waste in containers is permitted. The specific management requirements of each area are specified below.

3.1. CONTAINER STORAGE

The container storage areas are identified in the Container Management Report and summarized in Table 3.3. The actual locations of these container storage areas can be seen on the map in Permit Application Section 9, Appendix 9A. The maximum amount and type of wastes that may be handled are discussed below in Permit Condition 3.3.

3.2. CONTAINER-SPECIFIC INFORMATION TO BE MAINTAINED AT THE FACILITY

3.2.1. The Permittee shall maintain at the facility, until closure is completed for all container storage areas and certified by a qualified Professional Engineer, the following container-specific documents and information and all amendments, revisions and modifications to these documents and information:

3.2.2. A description of the containment systems including:

1. Basic design parameters, dimensions, and materials of construction;
2. How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system;
3. Capacity of the containment system relative to the number and volume of containers to be stored;
4. Provisions for preventing or managing run-on; and
5. How accumulated liquids can be analyzed and removed to prevent overflow.

3.2.3. For container storage areas holding wastes that do not contain free liquids, the Permittee shall maintain the following documentation onsite:

1. Test procedures and results or other documentation or information to show that the wastes do not contain free liquids;
2. A description of how the storage area is designed or operated to drain and remove liquids or how containers are kept from contact with standing liquids;
3. Sketches, drawings, or data demonstrating compliance with 40 CFR 264.176 (location of buffer zone (15m or 50ft) and containers holding ignitable or reactive wastes) and 40 CFR 264.177(c) (location of incompatible wastes in relation to each other), where applicable; and
4. Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with 40 CFR 264.177 and 264.17.

3.3. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

3.3.1. The Permittee may store in containers any hazardous waste identified in Part A of the Permit Application, and other hazardous wastes as identified in NAC 444.843, subject to the terms of this Permit. TSCA regulated PCB wastes are also subject to the terms of the Permittee's TSCA permit from US EPA. [See also NAC 444.9453]

3.3.2. The Permittee may store hazardous waste in any of the container storage areas listed in Table 3.3 up to the maximum volume specified, in accordance with Permit Application Section 9.

3.3.3. The Permittee is prohibited from treating waste in containers. Treatment is defined as "…any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume". *[40 CFR 260.10]*

Treatment does not include the addition of absorbent for incidental liquids.

Table 3.3

CS Area	Container Management Unit # and Name	Maximum Volume	Maximum Number and Type of Containers
1	CMU 1 - PCB /RCRA Storage Building	59,400 gallons (294 yd^3)	1080 55-gal drums
2	CMU 6 - Dry Hazardous Waste Storage Area #2 (DHWSA #2)	250,696 gallons (1241 yd^3)	4588 55-gal drums
3	CMU 7 - Bin Storage Area (Secondarily Contained)	80,778 gallons (400 yd^3)	1469 55-gal drums
4	CMU 16 - Container & Tank Management Building (CTMB)	246,520 gallons (1220 yd^3)	4482 55-gal drums
5	CMU 17 - Dry Hazardous Waste Storage Area #3 (DHWSA #3)	694,516 gallons (3438 yd^3)	12,627 55-gal drums
Total Storage Capacity		**1,331,910 gallons** (6593 yd^3)	**24,246 55-gal drums**

3.3.4. The Permittee may store hazardous waste for up to one (1) year in Container Storage Areas 1 through 5, as listed in Table 3.3.

3.3.5. Aisle space shall be maintained as noted in the Permit Application Section 9.2.3.2. Rows of containers shall be separated by a minimum aisle space of three (3) feet and containers shall be stored no more than two high.

3.3.6. The Permittee shall perform a Paint Filter Test (EPA method 9095 in SW 846) on all hazardous waste to be placed in CMU 6 & 17 (DHWSA 2 & 3) for which the absence of free liquids cannot be determined by visual inspection.

3.3.7. The Permittee shall not store or place any hazardous waste (whether accepted from offsite or generated onsite), which contains free liquids, as determined by the Paint Filter Test (EPA method 9095 in SW 846), in an area that does not have RCRA secondary containment.

3.3.8. The following wastes are prohibited from being stored or managed in CMU 6 and 17 (DHWSA 2 & 3): *[40 CFR 264.175(d)]*

1. Liquids
2. PCBs
3. Waste identified/labeled with the following EPA waste codes: F020, F021, F022, F023, F026 & F027

3.4. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with Permit Application Section 9. *[40CFR264.171]*

3.5. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall use a container made of, or lined with, materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired, in accordance with Permit Application Section 9.2.6. *[40 CFR 264.172]*

3.6. MANAGEMENT OF CONTAINERS

3.6.1. The Permittee shall keep all containers closed during storage or staging, except when it is necessary to visually inspect, add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. The Permittee shall follow the container management practices in Permit Application Section 9. *[40 CFR 264.173]*

3.7. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect all container areas in accordance with the Inspection Schedule in Permit Application Section 5, to detect leaking containers, improperly labeled containers, deterioration of containers and/or the containment system caused by corrosion and other factors. *[40 CFR 264.174]*

3.8. CONTAINMENT SYSTEMS

The Permittee shall construct and maintain the secondary containment systems as required by 40 CFR 264.175 and in accordance with Permit Application Section 9.2.4.

3.9. RECORDKEEPING

3.9.1. The Permittee shall place the results of all waste analyses, trial tests and inspections in the operating record. *[40 CFR 264.73]*

3.9.2. The Permittee must document compliance with 40 CFR 264.17(a) and (b) and 264.177 in the facility operating record. *[40 CFR 264.73]*

3.10. SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

3.10.1. The Permittee shall not locate containers holding ignitable or reactive waste within 50 feet (15 meters) of the facility's property line as required by 40 CFR 264.176.

3.10.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste as required by 40 CFR 264.17 and 264.176, and as specified in Permit Application Section 9.2.5.

3.11. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

3.11.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container, unless the Permittee complies with 40 CFR 264.17 (b). *[40 CFR 264.177(a)]*

3.11.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. *[40 CFR 264.177(b)]*

3.11.3. The Permittee shall separate containers of incompatible wastes as required by 40 CFR 264.177(c) and in accordance with Permit Application Section 9.2.6.

3.12. CONTAINER LABELING REQUIREMENTS

The Permittee shall comply with the labeling requirements of 40 CFR 262.30-262.32 and NAC 444.8671 and in accordance with Permit Application Section 9.2.3.2.

3.13. CLOSURE

Upon closure of any of the container storage areas, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system or area, as required by 40 CFR 264.178 and in accordance with the Closure Plan in Permit Application Section 9.2.7.

3.14. COMPLIANCE SCHEDULE

Reserved

4. SUMMARY

The tank storage portion of the facility includes five (5) Polychlorinated Biphenyls (PCB's) Storage Tanks and one (1) Leachate Storage Tank. The five PCB tanks are used exclusively for storage of TSCA regulated PCB waste. The maximum amount and type of wastes that may be handled are discussed below in Permit Condition 4.1.

[NOTE: Five (5) Stabilization Tanks (treatment pans) and one (1) Evaporation Tank (truck wash pad) designated as "treatment" tanks are discussed in Permit Section 5.]

4.1. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

4.1.1. The Permittee may store in Tanks T-4 through T-8 only TSCA regulated PCB wastes subject to the terms of the Permittee's TSCA permit from US EPA. Since the PCB waste is also a hazardous waste in Nevada pursuant to NAC 444.843 (and NAC 444.9453), Tanks T-4 through T-8 are also subject to RCRA regulation under 40 CFR Part 261. The Permittee may store in Tank T-15 any hazardous waste identified in Part A of the Permit Application, including PCB wastes, subject to the terms of this Permit.

4.1.2. The Permittee is prohibited from storing hazardous waste that is not identified in Permit Condition 4.1.1.

4.1.3. The Permittee may store a total volume of 38,000 gallons of hazardous waste in the tanks listed below, subject to the terms of this Permit and as follows:

Table 4.1

Tank ID #	Secondary Containment Required	Description	Capacity (Gallons)
T-4	Yes-In Place	PCB Storage	7,500
T-5	Yes-In Place	PCB Storage	7,500
T-6	Yes-In Place	PCB Storage	5,000
T-7	Yes-In Place	PCB Storage	5,000
T-8	Yes-In Place	PCB Storage (vacuum tank for transfer)	3,000
T-15	Yes-In Place	Leachate Storage Tank	10,000
		Total =	**38,000 gallons**

4.1.4. The Permittee may store hazardous waste for up to one (1) year in any of the storage tanks listed in Table 4.1. *[40 CFR 268.50]*

4.2. SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENTS

4.2.1. The Permittee shall design, construct, and operate the secondary containment system(s), in

accordance with the detailed design plans and descriptions contained in Permit Application Section 10. *[40 CFR 264.193(a)-(f)]*

4.2.2. The Permittee shall submit the integrity assessments required under 40 CFR 264.192 to the Director prior to operation of any new tank system.

4.3. OPERATING REQUIREMENTS

4.3.1. The Permittee shall not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. *[40 CFR 264.194(a)]*

4.3.2. The Permittee shall prevent spills and overflows from the tank or containment systems using the methods described in Permit Application Section 10. *[40 CFR 264.194(b)]*

4.4. RESPONSE TO LEAKS OR SPILLS

4.4.1 In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall comply with Permit Application Section 10.8 and remove the system from service immediately and complete the following actions: *[40 CFR 264.196]*

1. Immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.
2. If the release is from the tank system, the Permittee must, within 24 hours after detection of the leak or, if the Permittee demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.

   If the material released is to a secondary containment system, all released materials must be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.
3. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.
4. Close the system in accordance with the Closure Plan in Permit Application Section 10.10 unless the following actions are taken:

4.1 For a release caused by a spill that has not damaged the integrity of the system, the Permittee may return the system to service as soon as the released waste is removed and repairs, if necessary, are made.

4.2 For a release caused by a leak from the primary tank system into the secondary containment

system, the Permittee shall repair the system prior to returning the tank system to service.

4.3 If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in 40 CFR 264.192 and 264.193.

4.4.2. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

4.5. INSPECTION SCHEDULES AND PROCEDURES

4.5.1. The Permittee shall inspect the tank systems, in accordance with Permit Application Section 10.9, and complete the items in Permit Conditions 4.5.2 and 4.5.3 as part of those inspections.

4.5.2. The Permittee shall inspect the overfill controls in accordance with the schedule in Table 1 of Permit Application Section 5. *[40 CFR 264.195(a)]*

4.5.3. The Permittee shall inspect the following components of the tank system once each operating day: *[40 CFR 264.195(b), (c) and (f)]*

1. Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;
2. Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
3. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).
4. Ancillary equipment that is not provided with secondary containment, as described in 40 CFR 264.193(f)(1)-(4).

4.5.4. The Permittee shall inspect cathodic protection systems, in accordance with the following schedule*:* *[40 CFR 264.195(g)]*

1. The proper operation of the cathodic protection system must be confirmed within six months from initial installation and annually thereafter and;
2. All sources of impressed current must be inspected and tested every other month.

4.5.5. The Permittee shall document compliance with Permit Conditions 4.5.1 through 4.5.4 and place this documentation in the operating record for the facility. *[40 CFR 264.195(h)]*

4.5.6. For tanks subject to 40 CFR 264 Subpart CC, the Permittee shall comply with the inspection requirements in Permit Section 9.

4.6. RECORDKEEPING AND REPORTING

4.6.1. The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported). If the Permittee has reported the release pursuant to 40 CFR 302, that report satisfies the requirements of this Permit Condition. *[40 CFR 264.196(d)(1) and (2)]*

4.6.2. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Director: *[40 CFR 264.196(d)(3)]*

1. Likely route of migration of the release;
2. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
3. Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
4. Proximity of down-gradient drinking water, surface water, and populated areas; and
5. Description of response actions taken or planned.

4.6.3. The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days from returning the tank system to use. *[40 CFR 264.196(f)]*

4.6.4. The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the tank system. *[40 CFR 264.192(g)]*

4.6.5. The Permittee shall maintain at the facility a record of the results of leak tests and integrity tests conducted in accordance with 40 CFR 264.192 (a) and (d).

4.6.6. For tanks subject to 40 CFR 264 Subpart CC, the Permittee shall comply with the record keeping requirements in Permit Section 9.

4.7. SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

4.7.1. The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Permit Application Section 10.7.2 are followed. *[40 CFR 264.198(a)]*

4.7.2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981). *[40 CFR 264.198(b)]*

4.8. SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

4.8.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in Permit Application Section 10.7.1 are followed and unless 40 CFR 264.17(b) is complied with. *[40 CFR 264.199(a)]*

4.8.2. The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material. *[40 CFR 264.199(b)]*

4.9. CLOSURE AND POST-CLOSURE CARE

4.9.1. At closure of the tank system(s) the Permittee shall follow the procedures in the Closure Plan in Permit Application Section 10.10. *[40 CFR 264.197(a)]*

4.9.2. If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall close the tank system(s) and perform post-closure care in accordance with 40 CFR 264.197(b).

4.10. COMPLIANCE SCHEDULE

Reserved

5. SUMMARY

The amount and type of wastes that may be treated in tanks are discussed in this Section. The containment systems employed for the treatment tanks are discussed in detail in Permit Application Section 10. There are five (5) Stabilization Tanks (treatment pans) for the treatment of liquid and metal bearing wastes (See Table 5.1); Tanks T-1, T-2 and T-3 are outdoor units and Tanks T-18 and T-19 are indoor units. A sixth tank (T-11), located outdoor, is used for decontaminating equipment (trucks, etc) and allowing the wash-water to evaporate. The facility does not accept any waste with more than 500 ppm of VOCs; and hence, Tanks 1, 2, 3, 18 and 19 are not subject to 264 Subpart CC regulations. There also is no equipment (e.g. valves, pumps, etc.) associated with any of the Treatment Tanks; and as such, 264 Subpart BB is not applicable. Likewise, Tank 11 is assumed to contain less than 500 ppm of VOCs; however, the Permittee is required to test the solid and liquid phases in Tank 11 for VOCs as specified in this Permit section.

5.1. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

5.1.1. The Permittee may treat in tanks any hazardous waste identified in Part A of the Permit Application in the stabilization tanks listed in Table 5.1 within the parameters outlined in Permit Application Section 10.

5.1.2. The Permittee is prohibited from treating hazardous waste that is not identified in Permit Condition 5.1.1.

5.1.3. The Permittee may treat a total volume of 45,000 gallons/day of hazardous waste in Treatment Tank 1; 252,000 gallons/day each of hazardous waste in Treatment Tanks 2 and 3; 68,500 gallons/day each of hazardous waste in Treatment Tanks 18 and 19; and 10,000 gallons/day of hazardous waste in Tank 11; a total of 696,000 gallons/day, subject to the terms of this Permit.

Table 5.1

Tank ID #	Secondary Containment	Description	Capacity (gallons)	Permitted Throughput (gallons/day)
T-1	Yes- In Place	Stabilization Tank (Pan 1)	6,400	45,000
T-2	Yes- In Place	Stabilization Tank (Pan 2)	35,500	252,000
T-3	Yes- In Place	Stabilization Tank (Pan 3)	35,500	252,000
T-18	Yes- In Place	Stabilization Tank (Pan 4)	17,250	68,500
T-19	Yes- In Place	Stabilization Tank (Pan 5)	17,250	68,500
T-11	Yes-In Place	Evaporation Tank (Truck Wash Pad)	10,000	10,000
		Total =	**121,900**	**696,000**

5.2. SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENT

5.2.1. The Permittee shall ensure that the batch Stabilization Tanks T-1, T-2 and T-3 are provided with a backfill material that is non-corrosive, porous, homogeneous substance (e.g. sand) and that is installed so that the backfill is completely around the tank and compacted to ensure that the tank and piping, if any, are fully and uniformly supported. *[40 CFR 264.192 (c)]*

5.2.2. The Permittee shall ensure that all ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, or contraction. *[40 CFR 264.192 (e)]*

5.2.3. The Permittee shall design, construct, and operate the secondary containment system(s), in accordance with the detailed design plans and descriptions contained in the Permit Application Section 10. *[40 CFR 264.193(a)-(f)]*

5.2.4. The Permittee shall submit the integrity assessments required under 40 CFR 264.192 to the Director prior to operation of any new tank system and whenever the tanks are re-evaluated.

5.3. OPERATING REQUIREMENTS

5.3.1. The Permittee shall not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. *[40 CFR 264.194(a)]*

5.3.2. The Permittee shall prevent spills and overflows from the tank or containment systems using the methods described in Permit Application Section 10. *[40 CFR 264.194(b)]*

5.3.3. The Permittee shall, within 24 hours of completion and verification of treatment, remove all waste from the Stabilizations Pans 1 through 5.

5.4. RESPONSE TO LEAKS OR SPILLS

5.4.1. In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall comply with Permit Application Section 10.8 and remove the system from service immediately and complete the following actions: *[40 CFR 264.196]*

1. Immediately stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.

2. If the release is from the tank system, the Permittee must, within 24 hours after detection of the leak or, if the Permittee demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.

   If the material released is to a secondary containment system, all released materials must be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.

3. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

4. Close the system in accordance with the Closure Plan in Permit Application Section 10.10 unless the following actions are taken:

   4.1 For a release caused by a spill that has not damaged the integrity of the system, the Permittee may return the system to service as soon as the released waste is removed and repairs, if necessary, are made.

   4.2 For a release caused by a leak from the primary tank system into the secondary containment system, the Permittee shall repair the system prior to returning the tank system to service.

5. If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in 40 CFR 264.192 and 264.193.

5.4.2. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

5.5. INSPECTION SCHEDULES AND PROCEDURES

5.5.1. The Permittee shall inspect the tank systems, in accordance with the Inspection Plan in Permit Application Section 10.9, and complete the items in Permit Conditions 5.5.2 and 5.5.3 as part of those inspections.

5.5.2. The Permittee shall inspect the overfill controls in accordance with the schedule in Table 1 of Permit Application Section 5. *[40 CFR 264.195(a)]*

5.5.3. The Permittee shall inspect the following components of the tank system once each operating day: *[40 CFR 264.195(b), (c) and (f)]*

1. Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;
2. Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
3. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).
4. Ancillary equipment that is not provided with secondary containment, as described in 40 CFR 264.193(f)(1)-(4).

5.5.4. The Permittee shall inspect cathodic protection systems, in accordance with the following schedule*:* *[40 CFR 264.195(g)]*

1. The proper operation of the cathodic protection system must be confirmed within six months from initial installation and annually thereafter; and
2. All sources of impressed current must be inspected and tested every other month.

5.5.5. The Permittee shall document compliance with Permit Conditions 5.5.1 through 5.5.3 and place this documentation in the operating record for the facility. *[40 CFR 264.195(h)]*

5.5.6. For tanks subject to 40 CFR 264 Subpart CC, the Permittee shall comply with the inspection requirements in Permit Section 9.

5.6. RECORDKEEPING AND REPORTING

5.6.1. The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported). If the Permittee has reported the release pursuant to 40 CFR 302, that report satisfies the requirements of this Permit Condition. *[40 CFR 264.196(d)(1) and (2)]*

5.6.2. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Director: *[40 CFR 264.196(d)(3)]*

1. Likely route of migration of the release;
2. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
3. Results of any monitoring or sampling conducted in connection with the release. If the Permittee

finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

4. Proximity of downgradient drinking water, surface water, and populated areas; and
5. Description of response actions taken or planned.

5.6.3. The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days from returning the tank system to use. *[40 CFR 264.196(f)]*

5.6.4. The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of any new tank system. *[40 CFR 264.192(g)]*

5.6.5. The Permittee shall maintain at the facility a record of the results of leak tests and integrity tests conducted, in accordance with 40 CFR 264.192 (a) and (d).

5.6.6. The Permittee shall, on an annual basis, sample the Evaporation Pad liquid and solid phases in the tank and test for Volatile Organic Compounds (VOCs), RCRA TC metals, total cyanide, and conductivity. The test results shall be submitted to the Director with the annual facility report due March 1 (see Permit Condition 2.12.4).

5.6.7. For tanks subject to 40 CFR 264 Subpart CC, the Permittee shall comply with the record keeping requirements in Permit Section 9.

5.7. SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

5.7.1. The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Permit Application Section 10.7.2 are followed. *[40 CFR 264.198(a)]*

5.7.2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981). *[40 CFR 264.198(b)]*

5.8. SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

5.8.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in Permit Application Section 10.7.1 are followed and 40 CFR 264.17(b) is complied with.
[40 CFR 264.199(a)]

5.8.2. The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material. *[40 CFR 264.199(b)]*

5.9. CLOSURE AND POST-CLOSURE CARE

5.9.1. At closure of the tank system(s) the Permittee shall follow the procedures in the Closure Plan in Permit Application 10.10. *[40 CFR 264.197(a)]*

5.9.2. If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall close the tank system(s) and perform post-closure care in accordance with the 40 CFR 264.197 (b).

5.9. COMPLIANCE SCHEDULE

Reserved

Note: In the previous Permit NEVHW0019, this section was assigned to the Low Temperature Thermal Desorption (LTTD) unit. This unit is no longer in operation and the Permittee is in the process of closing this unit per the approved Closure Plan in Permit Application Section 15, dated April 1, 2004 and the closure schedule shown in Table 6 below:

Table 6

Completion Date	Task
3/11/2010 --- Day 0	Submit 45-day notice of closure to NDEP--- ***Completed***
4/25/2010 --- Day 45	Begin closure activities. Dismantle LTTD units. All debris which has been in contact with waste shall be macro-encapsulated and disposed in Trench 12 --- ***Completed***
7/24/2010 --- Day 135	Concrete pad shall be pressure washed and triple rinsed ---- ***Completed***
8/23/2010 --- Day 165	Final rinse of concrete pad with clean water. Collect water sample from final rinse and test for RCRA 8 metals and TOC* --- ***Completed***
9/7/2010 --- Day 180	Begin excavating soil in adjacent areas --- ***Completed***
12/6/2010 --- Day 270	Sample adjacent soils for RCRA 8 metals and TOC, VOC, SVOC & Pesticides --- ***Completed***
2/4/2011 --- Day 330	Submit final report to NDEP --- ***Completed***
6 months from the renewed RCRA Permit effective date	The asphalt pad apron shall be removed and underlying soil excavated with confirmatory soil sampling and analysis completed. ----

*****Based upon the initial confirmatory sample results, additional soil samples were collected from adjacent locations to the original TOC samples and analyzed for both volatile and semi-volatile organics. Additionally, it was suggested that the collected soil be analyzed for other constituents, such as herbicides or pesticides, which may serve as suitable indicators of any potential release from the LTTD. The Permittee has agreed to the removal of the asphalt apron at the perimeter of the existing concrete pad and excavation of the underlying soil. Provided the additional sample results are non-detect (*or below background*), clean closure of the LTTD may be accepted.

Based upon the encountered issues with use of only TOC samples initially for closure of this unit, the NDEP has requested the Permittee adjust and expand the sampling protocol from that identified in the Closure Plan for any future unit closures.

7. SUMMARY

Trench 11 and Trench 12 (Phases 1 & 2 of 3) are the currently operating landfills. Trench 11 was constructed with a double composite liner consisting of a primary 100-mil HDPE liner and a secondary 40-mil HDPE liner and 6" compacted clay liner amended with bentonite. The design was approved as meeting the Minimum Technology Requirements (MTR) in the June 6, 1988 permit. The below grade capacity of Trench 11 is 847 acre-feet (1.36 million cubic yards) and the area of the footprint is 12.3 acres. The above grade capacity of Trench 11 is 1,000,000 cubic yards. Currently Trench 11 is being used for PCB and PCB/RCRA wastes only and is expected to reach capacity and close in 2011-2012. Trench 12 Phase 1 (~0.42 million cubic yards below grade) was constructed in 2008 and Phase 2 (~0.33 million cubic yards below grade) was constructed in 2011 and are active. Trench 12 was constructed with a double composite liner consisting of a primary 80-mil HDPE liner and a secondary 60-mil HDPE liner and geosynthetic clay liner (GCL), exceeding the MTR. Trench 12 is currently not accepting any TSCA regulated PCB wastes pending TSCA permit from US EPA Region 9. The 11 acre base footprint to be occupied by Trench 12 and the total landfill capacity of 1029 acre-feet (1.66 million cubic yards) of waste and cover material is also included in this Permit.

7.1. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

The Permittee may dispose of the following hazardous wastes in Trench 11 and 12, subject to the terms of this Permit:

7.1.1. The Permittee may dispose of hazardous wastes as identified in the Part A application, and other hazardous wastes as identified in NAC 444.843, including wastes containing polychlorinated biphenyls, subject to the terms and limitations of this Permit.

7.1.2. The Permittee is prohibited from disposing of any hazardous waste that is not included in Permit Condition 7.1.1.

7.2. DESIGN AND OPERATING REQUIREMENTS

7.2.1. The Permittee shall design, maintain and operate landfill Trench 11 and 12 pursuant to Volume III, Appendix S (Geotechnical Investigation for Cell 12, Grant Environmental, 7/94, Cell 12 Design Report, TRC Environmental Solutions, 3/96 and Response to NOD for Cell 12 Design Report, HMA, December 1996, Response to Verbal Comments January 17, 1997 and January 30, 1997, HMA). All the above documents are part of Attachment 1 to this Permit.

7.2.2. The Permittee shall install and maintain two liners and a leachate collection and removal system (one above and one between the liners) in accordance with the design plans and reports in Permit Application Section 11 (Trench 11 already constructed and at capacity) and the Supplement-Landfill Report for Trench 12, October 2007 (standalone document which is part of Attachment 1 to this Permit). *[40 CFR 264.301(c)]*

7.2.3. The Permittee submitted a final cap design (approved by the Director by Revision 3 to Permit NEVHW0019) for Trenches 11 and 12 as described in the "Design Basis and Construction Specifications for Trenches 11 and 12 Final Covers—Supplement to Trench 12 Construction Quality Assurance Plan, April 2008" (standalone document) contained in Section 11 of Volume 2 of the Part B permit application. The alternative cover design (*aka* evapotranspiration or ET cover) has been designed to resist the maximum horizontal acceleration in lithified earth material for the site. Maximum horizontal acceleration is defined as the maximum expected horizontal acceleration depicted on a seismic hazard map with a 90 percent or greater probability that the acceleration will not be exceeded in 250 years. The Permittee shall close Trenches 11 and 12 in conformance with the above referenced plan.

7.2.4. Collected leachate must be managed in accordance with the procedures for all other waste streams outlined in the Waste Analysis Plan (Permit Application Section 8). Collected leachate may be used for dust suppression within the same cell from which it was generated, provided the collected leachate never leaves the landfill (see EPA memo dated May 23, 1996 in Permit Application Section 11.3.10).

7.2.5. The Permittee shall locate, construct, operate, and maintain Trench 11 and 12 as specified in permit Application Section 11 so as to prevent the migration of any hazardous constituents into the groundwater or surface water, at least as effectively as the liners and leachate collection and removal systems outlined in 40 CFR 264.301(c). *[40 CFR 264.301(d)]*

7.2.6. The Permittee shall design, construct, operate, and maintain a run-on and run-off control system in accordance with the design plans, specifications, and operating practices contained in Permit Application Section 11. *[40 CFR 264.301(f) and (g)]*

7.2.7. The Permittee shall empty or otherwise manage run-on and run-off collection and holding facilities to maintain the design capacity of the system(s) within 72 hours of a 25-year 24-hour storm event and in accordance with any other required permits (i.e. NPDES). *[40 CFR 264.301(h)]*

7.2.8. The Permittee shall cover or otherwise manage the landfill(s) to control wind dispersal of particulate matter, in accordance with the methods specified in Permit Application Section 11.3.10. *[40 CFR 264.301(j)]*

7.2.9. The Permittee shall sample and analyze each quarter, leachate from each Leachate Collection Removal System (LCRS) and Leachate Detection and Removal System (LDRS) for the parameters found in Table 10.3D in Permit Section 10. The results of these analyses shall be submitted with the bi-annual report required under Permit Condition 10.8.2.

7.2.10. Gravel to be used in the leachate sumps for Trench 12 shall meet the requirements of 40CFR 264.301(c)(3)(ii).

7.2.11. Prior to accepting waste in Trench 12, Phases 3, the Permittee must receive approval from the

Director.

7.3. ACTION LEAKAGE RATE / RESPONSE ACTION PLAN (RAP)

The Permittee shall operate Trench 11 and Trench 12 in accordance with the respective Response Action Plans (RAP) in Permit Application Section 11 (Appendices 11-B and 11-C).

7.3.1. The Action Leakage Rate (ALR) for Trench 11 is set at 211 gallons/acre-day and the ALR for Trench 12A, 12B and 12C are 204, 147 and 279 gallons/acre-day, respectively for each leak detection sump.

7.3.2. The Permittee shall calculate the gallons/acre-day (GPAD) leachate generation rate for each sump and submit the information along with the liquid level monitoring data and any leachate chemical analysis as required by Permit Condition 10.8.2.

7.3.3. The Permittee shall operate the leachate collection and detection systems without the head on any liner exceeding one (1) foot (30 cm).

7.3.4. The Permittee shall monitor each sump as required in the RAP in Permit Application Section 11.

7.3.5. The Permittee shall remove all pumpable fluids from each sump whenever the pump operating level, as defined in the RAP, is reached.

7.3.6. The Permittee shall notify the Director within 7 days of either an exceedence of the Action Leakage Rate (ALR) or the fluid head on either liner exceeding one foot. The notification must be followed by the submittal to the Director of a preliminary written assessment within (14) days of the exceedence. Within thirty (30) days of the initial notification, the Permittee shall submit an analysis of the liquid found in the sump with a summary of the other information required by the RAP.

7.4. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the landfill in accordance with the following conditions:

7.4.1. The Permittee shall inspect the liners and cover systems during construction and installation for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials).
[40 CFR 264.303(a)]

7.4.2. The Permittee shall inspect the landfill immediately after construction or installation.
[40 CFR 264.303(a)]

7.4.2.1. Synthetic liners and covers must be inspected to ensure tight seams and joints and the absence of tears, punctures, or blisters.

7.4.2.2. Soil-based and admixed liners and covers must be inspected for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover.

7.4.3. The Permittee shall inspect the landfill (including the liner and leachate collection system) in accordance with the inspection schedule in Permit Application Section 5. *[40 CFR 264.303(b)]*

7.4.3.1. The landfill must be inspected weekly and within 24 hours after a storm event of one quarter inch (0.25") or greater to detect evidence of any of the following:

1. Deterioration, malfunctions, or improper operation of run-on and run-off systems.
2. Proper functioning of wind dispersal control systems.
3. The presence of leachate in, and proper functioning of, leachate collection and removal systems.

7.5. CELL LOCATION SURVEYING

The Permittee shall maintain the following items in the operating record in accordance with Permit Application Section 11.3.9: *[40 CFR 264.73 and 40 CFR 264.309]*

1. A map with the exact location and dimensions (including depth) of each cell with respect to permanently surveyed benchmarks.
2. The types of waste in each cell and the approximate location of each hazardous waste type within each cell.

7.6. CLOSURE AND POST-CLOSURE CARE

The Permittee shall conduct closure and post-closure activities in accordance with the following conditions:

7.6.1. At final closure of the landfill, or upon closure of any cell, the Permittee shall follow the procedures in the approved Closure Plan contained in Permit Application Section 15 for Scheduled Closure and Permit Application Section 16 for Unscheduled Closure. *[40 CFR 264.310(a)]*

7.6.2. After final closure, the Permittee shall follow the plans and procedures in the approved Post-Closure Care Plan in Permit Application Section 17 and shall comply with Permit Section 13. *[40 CFR 264.310(b)]*

7.7. SPECIAL LANDFILL PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

The Permittee shall not place ignitable or reactive waste (including ignitable waste in containers) in the landfill, unless in accordance with 40 CFR 264.312(b) and the procedures specified in Permit Application Section 11.3.5 are followed.

7.8. SPECIAL LANDFILL PROVISIONS FOR INCOMPATIBLE WASTES

The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same landfill cell, unless in accordance within 40 CFR 264.17(b) and the procedures specified in Permit Application Section 11.3.5 are followed. *[40 CFR 264.313]*

7.9. SPECIAL LANDFILL PROVISIONS FOR HAZARDOUS WASTES F020, F021, F022, F023, F026, AND F027 [40 CFR 264.317]

7.9.1. The Permittee may place hazardous wastes F020, F021, F022, F023, F026, or F027 in the landfill only if the waste is shown to meet the treatment standard in 40 CFR 268.

7.9.2. The Permittee shall follow the special requirements for these wastes as specified in Permit Application Section 11.3.7.

7.10. SPECIAL LANDFILL PROVISIONS FOR BULK AND CONTAINERIZED LIQUIDS

7.10.1. The Permittee shall not place bulk or non-containerized liquid wastes, or waste containing free liquids (whether or not sorbents have been added) in a landfill. Use of leachate as dust suppression within the same cell from which it was collected, in accordance with Permit Application Section 11.3.10, is not considered placement under this section. *[40 CFR 264.314(a)]*

7.10.2. If undetermined by visual inspection, the Permittee shall demonstrate the absence of free liquids in either a containerized or a bulk waste by the following test: "Method 9095 (Paint Filter Liquids Test)" as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication No. SW-846) *[40 CFR 264.314(b)]*

7.10.3. The Permittee shall not place containers holding free liquid in the landfill unless: *[40 CFR 264.314(c)]*

1. All free-standing liquid: (i) has been removed by decanting, or other methods; (ii) has been mixed with absorbent or solidified so that free-standing liquid is no longer observed; or (iii) has been otherwise eliminated; or
2. The container is no larger than an ampule; or
3. The container is designed to hold free liquids for use other than storage (e.g., batteries, capacitors); or
4. The container is a lab pack as defined in 40 CFR 264.316 and is disposed of in accordance with Permit Condition 7.12.

7.10.4. The Permittee shall follow the procedures in Permit Application Section 11.3.3 to prevent the disposal of liquids in the landfill.

7.11. SPECIAL REDUCTION REQUIREMENTS FOR EMPTY CONTAINERS

The Permittee shall not dispose of any containers in the landfill unless they are at least 90 percent full when placed in the landfill or they are crushed, shredded, or similarly reduced in volume to the maximum practical extent before burial in the landfill, or they are no larger than an ampule.

[40 CFR 264.315]

7.11.1. The Permittee may stage in Trench 12 interim process loads while awaiting verification testing, in accordance with Permit Application Section 8.7.4.

7.12. DISPOSAL OF SMALL CONTAINERS OF HAZARDOUS WASTE IN OVERPACKED DRUMS (LAB PACKS)

The Permittee shall dispose of any small containers of hazardous waste in over-packed drums (lab packs) in accordance with the detailed plans and procedures contained in Permit Application Section 11.3.4.1. *[40 CFR 264.316]*

7.13. COMPLIANCE SCHEDULE

	Completion Date & Task
1	***Within one year after the final placement of waste*** - the Permittee shall close Trenches 11 and 12 in accordance with the standalone document, "Design Basis and Construction Specifications for Trenches 11 and 12 Final Covers -Supplement to Trench 12 Construction Quality Assurance Plan, April 2008", which has been adopted herein under Attachment 2 to this Permit. *[40 CFR 264.113]*
2	***Prior to accepting waste in Trench 12, Phase 3*** - the Permittee shall submit as-built drawings and the results of the construction and installation QA/QC Plan stamped by a qualified Professional Engineer.
3	***Within 60 days after the final placement of waste in Trench 11*** - The Permittee shall initiate the installation of a lysimeter system under the ET cover of Trench 11 pursuant to the design and protocol contained in "Final Cover Performance Monitoring System and Protocol, Disposal Trenches 11 and 12"--November 2009, revised January 2010, per the schedule in Permit Application Section 15, Table 15-2;

8. SUMMARY

The US EPA's National Waste Minimization Program supports efforts that promote a more sustainable society, reduce the amounts of waste generated, and lower the toxicity and persistence of wastes that are generated. The Permittee is required to conduct a Waste Minimization Program in accordance with this section of the Permit and Permit Application Section 3, Appendix H.

8.1. WASTE MINIMIZATION RECORD

The Permittee shall maintain at the facility copies of waste minimization documents required in Permit Conditions 8.2 and 8.3 and shall make them available to any authorized representative of the Division or US EPA conducting an inspection pursuant to 40 CFR 270.32 (b).

8.2. WASTE MINIMIZATION CERTIFICATION

The Permittee shall annually certify the following in accordance with 40 CFR 264.73 (b)(9):

1. The Permittee has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the facility operations to the degree, determined by the Permittee, to be economically practicable; and,

2. The method of treatment, storage, or disposal is the only practicable method or combination of methods currently available to the facility, which minimizes the present and future threat to human health and the environment.

3. This certification shall be retained with the facility's operating record and shall comply with the signatory requirements of Permit Condition 1.5.13.

8.3. SOURCE REDUCTION PLANS AND REPORTS

8.3.1. Source Reduction Evaluation Review and Plan

Within one (1) year of the effective date of this Permit, and at each permit renewal thereafter, the Permittee shall submit a source reduction evaluation review and plan to the Director. The review and plan should be conducted and prepared in accordance with the procedures and format provided in the EPA Waste Minimization Opportunity Assessment Manual or other equivalent source reduction guidance. The review and plan shall include at a minimum the following:

[40 CFR 270.32(b)]

1. The name and location of the facility.
2. The NAIC/SIC Code of the facility.
3. A copy of any written company policy or statement that outlines the general goals, objectives, and methods of source reduction to be implemented within the next five years.
4. Identification of all routinely generated hazardous waste streams, which result from ongoing processes or operations.
5. For each hazardous waste stream identified in Permit Condition 8.3.1.4 the following information shall be included:

1. An estimate of the quantity of hazardous waste generated.
2. An evaluation of source reduction approaches available to the Permittee, which are potentially viable. The evaluation shall consider at a minimum the following source reduction approaches:
    1. Input change;
    2. Operational improvement;
    3. Production process change; and,
    4. Product reformulation.

6. Any source reduction and/or recycling measure implemented by the Permittee in the last five years.

7. A specification of, and a rationale for, the technically feasible and economically practicable source reduction measures, which will be taken by the Permittee with respect to each waste stream identified. The review and plan shall fully document any statement explaining the Permittee's rationale for rejecting any available source reduction approach identified in Permit Condition 8.3.1.5.[1]

8. A detailed description of any programs the Permittee may have to assist generators of hazardous waste in reducing the volume or quantity and toxicity of wastes they produce.

9. An evaluation, and, to the extent practicable, a quantification, of the effects of the chosen source reduction method on emissions and discharges to the air, water, or land environmental mediums.

10. A description of employee training programs and employee incentive programs for source reduction, which may be in effect at the facility.

11. A timetable for making reasonable and measurable progress towards implementation of the selected source reduction measures identified in Permit Condition 8.3.1.7.

12. A summary of the source reduction evaluation review and plan.

13. Certification of the review and plan and the summary by a qualified Professional Engineer, or by an individual who is responsible for the processes and operation of the facility, or by an environmental assessor, who has demonstrated expertise in hazardous waste management. The engineer, individual, or assessor shall certify the review and plan and the summary only if the review and plan and the summary meet all the requirements of Permit Condition 8.3.1.

[1] Note: NDEP/EPA does not consider a source reduction method to be valid if it merely switches the waste load from one environmental medium (air, water, or land) to another.

8.3.2. Certification of Plan Implementation

At the time the review and plan required by Permit Condition 8.3.1 is submitted to the Director, the Permittee shall also submit a written statement from a responsible official of the facility certifying that the Permittee has implemented, is implementing, or will be implementing, the source reduction measures identified in the plan according to the implementation schedule contained in the Source Reduction Plan.

8.3.2.1. The Permittee may determine not to implement a measure selected pursuant to Permit Condition 8.3.1.7 only if the Permittee determines, upon conducting further analysis or due to unexpected circumstances, that the selected measure is not technically feasible or economically practicable, or if attempts to implement that measure reveal that the measure would result in, or has resulted in, any of the following:

1. An increase in the generation of waste (hazardous and solid).
2. An increase in the release of hazardous chemicals to other environmental media.
3. Adverse impacts on product quality.
4. A significant increase in the risk of an adverse impact to human health or the environment.

8.3.3. Source Reduction Plan and Plan Summary Amendments

If the Permittee elects not to implement the measures selected pursuant to Permit Condition 8.3.1.7, the Permittee shall amend its review and plan, and its summary to reflect this rejection and include in the review and plan, and in the summary, proper documentation identifying the rationale for this rejection. Any amendments to the review and plan or the plan summary shall be submitted to the Director no later than 30 days prior to implementation of the changes.

[40 CFR 270.32(b)]

8.3.4. Hazardous Waste Management Performance Report

Within one (1) year of the effective date of this permit and every year thereafter, the Permittee shall prepare a hazardous waste management performance report documenting hazardous waste management approaches implemented at the facility. The report shall be prepared in accordance with the EPA Waste Minimization Opportunity Assessment Manual or other equivalent source reduction guidance. The report shall include at a minimum the following: *[40 CFR 270.32(b)]*

1. The name and location of the facility.
2. The SIC Code for the facility.
3. The following information for each waste stream identified pursuant to Permit Condition 8.3.1.4.

    1. An estimate of the quantity of hazardous waste generated and the quantity of hazardous waste managed by the Permittee during the current reporting year and the baseline year. The current reporting year is the calendar year immediately proceeding the year in which the report is to be prepared. For the initial report, the baseline year is any calendar year selected by the Permittee for which substantial data is available on waste generation, or on-site or off-site management. Alternatively, the Permittee may select the current reporting year as

the initial baseline year. For all subsequent reports, the baseline year is the current reporting year of the immediately preceding report.

2. An assessment of the effect, during the current year, of each hazardous waste management measure implemented since the baseline year, upon the generation and the on-site and off-site management of hazardous waste. For the initial report, the assessment of the effect required by this condition shall be made for the current year in general terms for any waste management measures implemented in the preceding five years. The report shall consider, but shall not be limited to, measures which use the following approaches:
    1. Source reduction.
    2. Recycling.
    3. Treatment.

3. A description of factors during the current reporting year that have affected hazardous waste generation and on-site and off-site hazardous waste management since the baseline year. For the initial report, the description of factors shall be made in general terms for those factors affecting generation and management in the preceding five years. The description shall include, but is not limited to, any of the following:
    1. Changes in business activity.
    2. Changes in waste classification.
    3. Natural phenomena.
    4. Other factors that have affected either the quantity of hazardous waste generated or on-site and off-site hazardous waste management requirements.

4. A description of any factors, which may have prevented implementation of any aspect of the source reduction plan.

4. A summary of the Hazardous Waste Management Performance Report.

5. Certification of the report and summary by a qualified Professional Engineer, or by an individual who is responsible for the processes and operations of the facility, or by an environmental assessor, who has demonstrated expertise in hazardous waste management. The engineer, individual, or assessor shall certify the report and summary only if the report and summary meet all the requirements of Permit Condition 8.3.4.

8.4. COMPLIANCE SCHEDULE

Reserved

9. SUMMARY

The Permittee is required to manage hazardous waste in accordance with the air emission standards of Subpart AA, BB, and CC of 40 CFR Part 264, as applicable. Hazardous waste managed in containers (Permit Section 3) and tanks (Permit Sections 4 & 5) are subject to these requirements as specified in this Permit. At the time this permit was issued, no Hazardous Waste Management Unit subject to 40 CFR 264 Subpart AA was permitted at this facility.

9.1. ORGANIC AIR EMISSION STANDARDS

9.1.1. Prior to constructing any Hazardous Waste Management Unit with process vents subject to the requirements of 40 CFR 264, Subpart AA or installing any additional equipment subject to the requirements of 40 CFR 264, Subpart BB, the Permittee shall apply for a permit modification as described in Permit Condition 1.2.1, and provide the specific Part B information required under 40 CFR 270.24 and 270.25, as applicable, with the modification request.

9.1.2. Prior to installing any tank, surface impoundment or miscellaneous unit subject to 40 CFR 264, Subpart CC, the Permittee shall apply for a permit modification described in Permit Condition 1.2.1, and provide the specific Part B information required under 40 CFR 270.27, as applicable, with the modification request.

9.1.3. The Permittee shall also maintain compliance with the Air Quality Operating Permit #AP4953-0184.3 (and its revisions and renewal if any) issued to American Ecology Corporation by NDEP, Bureau of Air Pollution Control.

9.2. APPLICABILITY

40 CFR 264 Subpart BB establishes air emission controls for equipment leaks. Subpart BB applies to equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight for at least 300 hours per calendar year. 40 CFR 264 Subpart CC establishes air emission controls for tanks, surface impoundments, or containers subject to 40 CFR 264 Subparts I, J, or K. Generally, if a hazardous waste has an average volatile organic concentration less than 500 parts per million by weight (ppmw) at the point of waste origination, the unit is exempt from the Subpart CC regulations. The tanks and containers identified in Table 9.2 below are subject to Subpart BB and/or Subpart CC regulations:

Table 9.2

HWMU Designation/Identification Number	HWMU Type	Is BB/CC applicable?	Description Of Air Emission Control System, if applicable
PCB/RCRA Storage Building (CMU1)	Container Storage-drums	Yes--CC	Level 1 Controls

HWMU Designation/Identification Number	HWMU Type	Is BB/CC applicable?	Description Of Air Emission Control System, if applicable
Dry Hazardous Waste Storage Area #2 (CMU6)	Container Storage	Yes--CC	Level 1 or 2 Controls
Bin Storage Area (CMU7)	Container Storage	Yes--CC	Level 1 Controls
Container & Tank Management Building (CMU16)	Container Storage	Yes--CC	Level 1 Controls
Dry Hazardous Waste Storage Area #3 (CMU17)	Container Storage – Roll offs	Yes--CC	Level 1 or 2 Controls
T-4*	Tank Storage – PCB	Yes—BB/CC	Level 1 Controls
T-5*	Tank Storage – PCB	Yes—BB/CC	Level 1 Controls
T-6*	Tank Storage – PCB	Yes—BB/CC	Level 1 Controls
T-7*	Tank Storage – PCB	Yes—BB/CC	Level 1 Controls
T-8*	Tank Storage – PCB	Yes—CC	Level 1 Controls
T-15*	Leachate Storage	Yes---CC	Level 1 Controls
T-1**	Tank Treatment--Pan 1	Yes—CC	Level 2 Controls
T-2**	Tank Treatment--Pan 2	Yes—CC	Level 2 Controls
T-3**	Tank Treatment--Pan 3	Yes—CC	Level 2 Controls
T-18**	Tank Treatment--Pan 4	Yes—CC	Level 2 Controls
T-19**	Tank Treatment--Pan 5	Yes—CC	Level 2 Controls
T-11**	Tank Treatment--Truck Wash Pad	Yes—CC	Level 2 Controls

* These tanks are currently not subject to Subpart CC standards since the contents of these tanks are not likely to contain any VOCs. T-8 is under vacuum service and hence not subject to Subpart BB standards per 264.1050(e).

** These tanks are currently not subject to Subpart CC standards since USEN does not treat in these tanks any waste with VOCs > 500 ppm

9.2.1. The Permittee shall use the procedures specified in 40 CFR 264.1063(d) to determine if an equipment is subject to the Subpart BB air emission standards.

9.2.2. The Permittee shall use the procedures specified in 40 CFR 264.1082 to determine if a waste stream requires Subpart CC air emission controls or documentation submitted by the generator of the waste. When using generator-supplied information, the determination shall be made in accordance with 265.1084.

9.3. INSPECTION AND REPORTING REQUIREMENTS

9.3.1. The Permittee shall inspect containers using Container Level 1 controls and their covers as follows:

9.3.1.1. Containers managed at the facility which are not empty per 40 CFR 261.7(b), shall be visually inspected within 24 hours of acceptance. Each container and its cover shall be inspected for visible cracks, holes, gaps or other open spaces when the cover or closure device is secured in the closed position. If a defect is detected, the Permittee shall repair the defect in accordance with Permit Condition 9.3.1.2.

9.3.1.2. When a defect is detected for a container, cover or closure device, the Permittee shall make first efforts at repair of the defect no later than 24 hours after detection, and the repair shall be completed as soon as possible but no later than 5 calendar days after the defect is detected. If a repair or defect cannot be completed within 5 calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

9.3.2. Visual inspections, monitoring, and all recordkeeping requirements shall be met for each unit to ensure compliance with 40 CFR 264.1088.

9.3.3. The Permittee shall report to the Director within 7 days any unit that is not listed in Table 9.2 and which is managing hazardous waste such that 40 CFR 264 Subpart AA, BB and CC should apply to that unit.

9.3.4. A monitoring and inspection schedule and procedures shall be submitted to the Director, within thirty (30) calendar days prior to the anticipated start-up of any new Subpart CC unit or emissions control technology on existing units. The inspection schedule and procedures shall be approved by the Director prior to any continuous or intermittent operations.

9.3.5. The Permittee shall determine if a Permit modification is required under 40 CFR 270.42 or Permit Conditions 1.2 for any new activity requiring management under this Section and follow the procedures in 40 CFR 270 to obtain a Permit modification if required.

9.3.6. The Permittee shall mark, inspect, monitor and repair, as applicable, all equipment subject to Subpart BB standards in accordance with 40 CFR 264.1052-1062.

9.3.7. The Permittee shall comply with the test method and procedure requirements in 40 CFR 264.1063 pertaining to all equipment subject to Subpart BB standards.

9.3.8. The Permittee shall comply with the reporting requirements, as applicable, provided in 40 CFR 264.1065 pertaining to all equipment subject to Subpart BB standards, as specified in Permit Condition 2.12.4.11

9.4. OPERATING REQUIREMENTS

9.4.1. The Permittee shall control air pollutant emissions from each container subject to this section in accordance with the following requirements as applicable to the container:

[40 CFR 264.1086(b)(1)]

9.4.1.1. For a container having a design capacity greater than 26 gallons and less than 119 gallons, the Permittee shall control air pollutant emissions from the container in accordance with the Container Level 1 standards specified in Permit Condition 9.4.2 below.

9.4.1.2. For a container having a design capacity greater than 119 gallons that is not in light material service, the Permittee shall control air pollutant emissions from the container in accordance with the Container Level 1 standards in Permit Condition 9.4.2 below.

9.4.2. A container using Container Level 1 standards is one of the following:

[40 CFR 264.1086(c)(1)]

9.4.2.1. A container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation, as specified in 49 CFR Part 178-Specifications for Packaging or 49 CFR Part 179 (Specifications for Tank Cars and 40 CFR Part 107, Subpart B-Exemptions; 49 CFR Part 172-Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements; 49 CFR Part 173-Shippers-General Requirements for Shipments and Packages; and 49 CFR Part 180-Continuing Qualification and Maintenance of Packaging).

9.4.2.1.1. For the purpose of complying with this Part, no exceptions to the 49 CFR Part 178 or 179 regulations are allowed except as provided in Permit Condition 9.4.2.2.

9.4.2.1.2. For a lab pack that is managed in accordance with the requirements of 49 CFR Part 178 for the purpose of complying with this Section, the Permittee may comply with the exceptions for combination packaging specified in 49 CFR Part 173.12(b).

9.4.2.2. A container equipped with a cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container.

The cover may be a separate cover installed on the container (e.g. a lid on a drum or a suitably secured tarp on a roll-off box or may be an integral part of the container structural design such as a "portable tank" or bulk cargo container equipped with a screw type cap).

9.4.2.3. An open-top container in which an organic-vapor suppressing barrier (e.g. organic-vapor suppressing foam) is placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere.

9.4.3. A container using Container Level 1 controls shall have a cover or closure device that is compatible with the waste and the intended management of the container. *[40 CFR 264.1086(c)(2)]*

9.4.4. Whenever storing a container using Container Level 1 controls, the Permittee shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as follows: *[40 CFR 264.1086(c)(3)]*

9.4.4.1. Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material to the container as follows:

9.4.4.1.1. In the case when the container is filled to the intended final level in one continuous operation, the Permittee shall promptly secure the closure devices in the closed position and install the covers as applicable to the container, upon the conclusion of the filling operation.

9.4.4.1.2. In the case when discrete quantities or batches of material intermittently are added to the container over a period of time, the Permittee shall promptly secure the closure devices in the closed position and install covers as applicable to the container upon:

1. Either the container being filled to the intended final level;
2. The completion of a batch loading after which no additional material will be added to the container within 15 minutes;
3. The person performing the loading operation leaving the immediate vicinity of the container; or
4. The shutdown of the process generating the material being added to the container, whichever condition occurs first.

9.4.4.2. Opening of a closure device or cover is allowed for the purpose of removing hazardous waste from the container as follows: *[40 CFR 264.1086(c)(3)(ii)]*

9.4.4.2.1. For the purposes of meeting the requirements of this Section, an empty container as defined in 40 CFR 261.7(b) may be open to the atmosphere at any time (i.e., covers and closure devices are not required to be secured in the closed position on an empty container).

9.4.4.2.2. In the case when discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container as defined by

261.7(b), the Permittee shall promptly secure the closure devices in the closed position and install covers as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the operation leaves the immediate vicinity of the container, whichever occurs first.

9.4.4.3. Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities (e.g., sampling) other than transfer of hazardous waste. Following completion of the activity, the Permittee shall promptly secure the closure device or reinstall the cover, as applicable to the container.

9.4.4.4. Opening of a spring-loaded, pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for maintaining the internal pressure of the container in accordance with the container design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever internal pressure of the container is within the normal internal operating pressure for that container as defined in 40 CFR 264.1086(c)(3)(iv).

9.4.4.5. Opening of a safety device as defined in 40 CFR 264.1081, is allowed at any time conditions require doing so to avoid an unsafe condition.

9.5. RECORDKEEPING REQUIREMENTS

9.5.1. The Permittee shall maintain at the facility in the operating record the following information:

9.5.1.1. A copy of the procedure used to determine that containers with a capacity of 119 gallons or greater, which do not meet applicable DOT regulations as specified in 264.1086(f), are not managing hazardous waste in light service.

9.5.1.2. For waste streams that do not require the use of air emission control equipment, documentation shall be recorded and maintained in the operating record that includes the information that was used by the Permittee for each waste determination (e.g. test or certification by the generator). If analysis results for waste samples are used for the waste determination, then the Permittee shall record the date, time, and location that each waste sample is collected in accordance with applicable requirements in 40 CFR 264.1083.

9.5.1.3. For containers used at the facility to manage hazardous wastes covered by this Section, sufficient information shall be provided to describe:

1. A facility identification number for the container or group of containers;

2. The purpose and placement of this container, or group of containers, in the management train of this hazardous waste;
3. The procedures used to ultimately dispose of the hazardous waste handled in the containers.

9.5.2. The Permittee shall comply with the recordkeeping requirements of 40 CFR 264.1064, as applicable, pertaining to all equipment subject to Subpart BB standards.

9.5.3. The Permittee shall maintain at the facility until closure of the facility is completed and certified by a qualified Professional Engineer, the following air emission control documents and information and all amendments, revisions and modifications to these documents and information:

9.5.3.1. Identification of each area that manages waste subject to 40 CFR 264 Subpart AA, BB or CC controls and the Permittee's certification that the requirements of this Subpart are met. The facility must document if the containers are subject to Level 1, Level 2 or Level 3 requirements;

9.5.3.2. An emission monitoring plan for Method 21 in 40 CFR Part 60, Appendix A. This plan shall include monitoring point(s), monitoring methods for control devices, monitoring frequency, procedures for documenting any exceedence, and procedures for mitigating noncompliance.

9.5.4. The Permittee shall maintain compliance with and follow procedures in Permit Application Section 9.2.8

9.6. COMPLIANCE SCHEDULE

Reserved

10. SUMMARY

The Permittee is required to conduct a Groundwater Detection Monitoring Program in compliance with 40 CFR 264.98. A description of the facility defining onsite and offsite, specifically, the "Point of Compliance" (POC) (see 40 CFR 264.95) is identified by the legal description of the facility as contained in Section 3, Appendix F of the Permit Application.

The USEN environmental monitoring system includes data from 23 groundwater monitoring wells (18 upper aquifer wells and 5 lower aquifer wells), five pairs of leachate sumps and a soil vapor extraction well. The existing up gradient wells (background) are Wells 313, 318 & 319 in the upper aquifer. The five lower aquifer wells are currently not being sampled due to insignificant or zero yield. The system monitors for releases from landfill Trenches 11, 12 and the pre-RCRA Solid Waste Management Units (SWMUs) including Trenches 1 through 10.

10.1. POINT OF COMPLIANCE

The Point of Compliance (POC) is established as described in Permit Condition 10 above. All wells identified herein as POC wells or installed for that purpose subsequent to Permit issuance are considered reflective of the conditions at the Point of Compliance. For the purposes of determining whether the facility complies with the Groundwater Protection Standards established herein, any exceedence of the Groundwater Protection Standards identified in Table 10.3A requires compliance with Permit Condition 10.6 and 10.7.

10.2. WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee shall install and maintain a groundwater monitoring system as required by 40 CFR 264.97 and as specified in Permit Application Section 13, and as summarized below:

10.2.1. The Permittee shall install and maintain groundwater monitoring wells at the locations specified on the map in Permit Application Section 13, Figure 13-3 and in conformance with Table 10.2:

Table 10.2

MONITORING WELL IDENTIFICATION		DESIGNATION
1	001	POC
2	002	POC
3	308	POC
4	309	POC
5	310	POC
6	311	POC
7	313	Background

MONITORING WELL IDENTIFICATION		DESIGNATION
8	315A	POC
9	316	POC
10	317	POC
11	318	Background
12	319	Background
13	320	POC
14	322	POC
15	324	POC
16	325	POC
17	326	POC
18	327	POC
19	600	Supplemental ~ Lower Aquifer
20	601	Supplemental ~ Lower Aquifer
21	603	Supplemental ~ Lower Aquifer
22	604	Supplemental ~ Lower Aquifer
23	605	Supplemental ~ Lower Aquifer

10.2.2. Any wells deleted from the monitoring program shall be plugged and abandoned in accordance with NAC 534.420, and shall be decommissioned only upon prior approval of the Director. All well decommissioning methods and certification reports shall be submitted to the Director within 60 days from the date any wells are approved to be removed from the monitoring program.

10.3. INDICATOR PARAMETERS AND MONITORING CONSTITUENTS

For the purposes of determining whether a Statistically Significant Increase has occurred, the Groundwater Protection Standard (GWPS) in Table 10.3A will be used. The Permittee shall monitor the wells described in Permit Condition 10.2, for the following parameters: *[40 CFR 264.98(a)]*

Table 10.3A

CONSTITUENT		GROUNDWATER PROTECTION STANDARD (mg/L)
1	Arsenic	0.01
2	Barium	0.1
3	Cadmium	0.02
4	Chromium	0.06
5	Lead	0.05
6	Mercury	0.002

7	Selenium	0.04
8	Silver	0.04
9	Cyanide	0.02
10	Fluoride	1.4 (Ln of Result)
11	Sodium	175
12	Sulfate	230
13	Chloride	80
14	TOX	0.01
16	TOC	2.1
17	PH	7<pH<8.4
18	Specific Conductance	980<SpCd<1240 umhos
19	Nitrate-Nitrite as N	1.7

Table 10.3B*

Constituent		**Groundwater Protection Standard (mg/l)**
1	Endrin (1,2,3,4,10,10- hexachloro-1,7-epoxy-1,4, 4a,5,6,7,8,9a-octahydro-1,4-endo,endo-5,8-dimethano naphthalene)	0.0002
2	Lindane (1,2,3,4,5,6-hexachlorocyclohexane, gamma isomer)	0.004
3	Methoxychlor (1,1,1- Trichloro-2,2-bis (p-methoxyphenylethane)	0.1
4	Toxaphene ($C_{10}H_{10}Cl_6$, Technical chlorinated camphene, 67-69 percent chlorine)	0.005
5	2,4-D (2,4-Dichlorophenoxyacetic acid)	0.1
6	2,4,5-TP Silvex (2,4,5-Trichlorophenoxypropionic acid)	0.01

* 40 CFR 264.94(a)(2) Table1

Table 10.3C

Radioisotope		**Groundwater Protection Standard**
1	Gross Alpha	22 pCi/L
2	Gross Beta	25 pCi/L
3	Radium 226 / Radium 228	5pCi/L (Combination of Radium 226 & 228)
4	Tritium	250 pCi/L

Table 10.3D

Monitored Leachate Constituent(s)			
1	All constituents listed in Table 10.3A	6	Toluene
2	Chloroform	7	Total PCBs
3	Tetrachloroethene	8	Acetone
4	1,1,1-Trichloroethane	9	Carbon Tetrachloride
5	Trichlorofluoromethane	10	Trichloroethene

10.3.1. The Permittee shall monitor all wells listed in Table 10.2 for the parameters and constituents listed in Tables10.3A, 10.3B and 10.3C in accordance with Permit Condition 10.3.1.1. *[40 CFR 264.98(a)]*

10.3.1.1. All Point of Compliance (POC) and background wells in Table 10.2 shall be sampled quarterly, for parameters and constituents listed in Table 10.3A; and sampled biannually for parameters and constituents listed in Tables 10.3B and 10.3C. All Supplemental Wells shall be sampled every 5th quarter (calendar year basis) and shall be sampled and analyzed for the parameters and constituents in Tables 10.3A, 10.3B and 10.3C[1].

10.3.1.2. The Permittee shall sample and analyze pumped leachate quarterly for the parameters specified in Table 10.3D.

10.3.2. The Permittee shall take sufficient number and volume of samples from each background well to analyze for each parameter and/or constituent identified in Tables 10.3A, 10.3B and 10.3C each time the system is sampled. *[40 CFR 264.97(g)]*

10.3.2.1. Point of Compliance (POC) and background wells shall have four independent field measurements of specific conductance and pH at the time of each quarterly sampling event. *[40 CFR 264.98(d)]*

10.3.2.2. Background groundwater quality for monitoring parameters or constituents shall be based on all available data from quarterly sampling of Wells 313, 318 and 319. *[40 CFR 264.97(g)]*

10.3.2.3. The Permittee shall take a minimum of one sample from each well, each time the up-gradient well(s) are sampled, to identify changes to background groundwater quality for each parameter or constituent. *[40 CFR 264.97(g)(2)]*

10.3.2.4. The Permittee shall recalculate the Groundwater Protection Standards established in Tables 10.3A, 10.3B, and 10.3C and include such calculations when submitting an application for permit renewal in accord with 40 CFR 270. The recalculation shall include all data obtained from the background wells, which will be used by the Director to assist in establishing a background

[1] Based on USEN's justification as provided in Permit Application Section 13, Appendix 13G, the Director has waived the requirement to sample the Supplemental Wells 600, 601, 603, 604 and 605 until further notice. However, these wells must be maintained per Permit Condition 10.2.1.

limit for each parameter or constituent monitored; alternatively the Director may accept another suitable method of establishing the Groundwater Protection Standards which the Permittee can request through a permit modification following the procedures outlined in Permit Condition 1.2.1.

10.4. SAMPLING AND ANALYSIS PROCEDURES

The groundwater monitoring program must include sampling and analysis procedures that accurately measure hazardous constituents in groundwater and that are designed to ensure monitoring results that provide a reliable indication of the groundwater below the hazardous waste management area. The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Permit Condition 10.2:

[40 CFR 264.97(d) and (e)]

10.4.1. Samples shall be collected using the techniques described in the Groundwater Monitoring Plan in Permit Application Section 13.

10.4.2. Samples shall be preserved and shipped (when shipped off site for analysis), in accordance with the procedures specified in the Groundwater Monitoring Plan in Permit Application Section 13.

10.4.3. Samples shall be analyzed in accordance with the procedures specified in the Groundwater Monitoring Plan in Permit Application Section 13.

10.4.4. Samples shall be tracked and controlled using the chain-of-custody procedures specified in the Groundwater Monitoring Plan in Permit Application Section 13.

10.4.5. Field sampling equipment shall be calibrated in accordance with the manufacturer's guidelines for each piece of equipment. Manufacturer's guidelines for each field-sampling device shall be maintained at the facility. The calibration data shall be recorded and maintained as part of the operating record of the facility.

10.5. ELEVATION OF THE GROUNDWATER SURFACE

The Permittee shall determine the elevation of the groundwater surface at each well each time the groundwater is sampled, in accordance with Permit Condition 10.4 and Permit Application Section 13. *[40 CFR 264.97(f)]*

10.6. MONITORING PROGRAM AND DATA EVALUATION

10.6.1. The Permittee shall collect, preserve, and analyze samples pursuant to Permit Condition 10.3 and 10.4.

10.6.2. The Permittee shall determine groundwater quality at each monitoring well at the compliance point quarterly during the active, closure and post-closure life of all regulated units. *[40 CFR 264.98(d)]*

10.6.2.1. The Permittee shall express the groundwater quality at each monitoring well in a form necessary for the determination of statistically significant increases. *[40 CFR 264.97(h)]*

10.6.3. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer biannually and submit the results to the Director per Permit Condition 10.8.3. *[40 CFR 264.98(e)]*

10.6.4. The Permittee shall determine whether there is a statistically significant increase over the Groundwater Protection Standards for each parameter identified in Table 10.3A each time groundwater quality is determined at the compliance point. In determining whether such an increase has occurred, the Permittee must compare the Groundwater Protection Standards at each monitoring well specified in Table 10.2 to the background limits specified in Table 10.3A. *[40 CFR 264.98(f)]*

10.7. STATISTICAL PROCEDURES

10.7.1. A statistically significant increase is determined by comparing each groundwater monitoring result to the corresponding background limit. If the value of the groundwater data is higher than its respective background limit, the Permittee shall:

10.7.1.1. Resample the affected well for required parameters at the next scheduled quarterly sampling event.

10.7.1.2. Compare the results obtained to the Groundwater Protection Standard limits in Table 10.3A. If the results of the resample are higher than the background limit, such that two consecutive results exceed the Groundwater Protection Standard, then the Permittee shall comply with Permit Conditions 10.7.2 and/or 10.7.3.

10.7.2. If the Permittee determines, pursuant to Permit Condition 10.7.1.2, there is a statistically significant increase above the background values for the parameters and constituents specified in Table 10.3A, the Permittee may demonstrate that a source other than a currently operating regulated unit caused the increase or that the increase resulted from error in sampling, analysis, evaluation, or natural variation in the groundwater. *[40 CFR 264.98(g)(6)]*

In such cases, the Permittee shall:

10.7.2.1. Notify the Director in writing as part of the next regularly scheduled semi-annual Groundwater Monitoring Report that the Permittee intends to make such a demonstration, and *[40 CFR 264.98(g)(6)(i)]*

10.7.2.2. Submit a demonstration in that report that a source other than a currently operating regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, evaluation, or

natural variation in the groundwater. *[40 CFR 264.98(g)(6)(ii)]*

10.7.2.3. The Permittee shall perform the evaluations described in Permit Condition 10.6.4 through 10.7.2 within 90 days after receipt of quarterly groundwater analytical results. *[40 CFR 264.98(f)(2)]*

10.7.3. If the Permittee determines, pursuant to Permit Condition 10.7.1.2, that there is a statistically significant increase above the Groundwater Protection Standards for the parameters specified in Table 10.3A, and the Permittee does not submit the required demonstration under Permit Condition 10.7.2.2, then the Permittee shall:

10.7.3.1. Notify the Director in writing within seven days of the determination. *[40 CFR 264.98(g)(1)]*

10.7.3.2. Immediately sample the groundwater in all wells and determine the concentration of all constituents identified in Appendix IX (excluding dioxins/furans) of 40 CFR 264. *[40 CFR 264.98(g)(2)]*

10.7.3.3. For any Appendix IX compounds found in the analysis pursuant to Permit Condition 10.7.3.2, the Permittee may sample at the next regularly scheduled quarterly sampling event and repeat the analysis for those compounds detected. If the results of the re-sample confirm the initial results, then the newly identified constituents will form the basis for Compliance Monitoring. If the Permittee does not re-sample, the compounds found pursuant to Permit Condition 10.7.3.2 will form the basis for the Compliance Monitoring. *[40 CFR 264.98(g)(3)]*

10.7.3.4. Within 90 days of submitting the Biannual Groundwater Monitoring Report, submit to the Director, an application for a permit modification to establish a Compliance Monitoring program for the currently operating regulated units. *[40 CFR 264.98(g)(4)]*

The application must include the following information:

10.7.3.4.1. An identification of the concentration of any Appendix IX constituent detected in the groundwater at each monitoring well at the compliance point; *[40 CFR 264.98(g)(4)(i)]*

10.7.3.4.2. Any proposed changes to the groundwater monitoring system at the facility necessary to meet the requirements of 40 CFR 264.99; *[40 CFR 264.98(g)(4)(ii)]*

10.7.3.4.3. Any proposed changes to the monitoring frequency, sampling and analysis procedures or methods, or statistical methods used at the facility necessary to meet the requirements of 40 CFR 264.99. *[40 CFR 264.98(g)(4)(iii)]*

10.7.3.4.4. An engineering feasibility study plan for a corrective action program, including the documents, if any, listed in Permit Section 12A.9, necessary to meet 40 CFR 264.100 unless:

10.7.3.4.4.1. All hazardous constituents identified under 10.7.3.4.1 are listed in Table 1 of 40 CFR 264.94

and their concentrations do not exceed the respective values given in that Table; or

10.7.3.4.4.2. Within 90 days, submit to the Director an application for a permit modification to Section 12A to make any appropriate changes to the monitoring program at the facility; and *[40 CFR 264.98(g)(6)(iii)]*

10.7.3.4.4.3. Continue to monitor in accordance with the monitoring program at the facility. *[40 CFR 264.98(g)(6)(iv)]*

10.8. RECORDKEEPING AND REPORTING

10.8.1. The Permittee shall enter all field equipment calibration data, monitoring, testing, and analytical data obtained in accordance with Permit Condition 10.4 in the operating record. *[40 CFR 264.73(b)(6)]*

The data must include all computations, calculated means, variances, and tests of distribution results.

10.8.2. The Permittee shall submit to the Director the analytical and field data results required by Permit Conditions 10.3 and the results of the statistical analyses required by Permit Condition 10.7 in accordance with Table 10.8 below. The data shall be reported in graphical, tabular and electronic file format as approved by the Director.

Table 10.8

Bi-Annual Period		***Due Date***
1	January 1-June 30	September 30
2	July 1 – December 31	March 30

10.8.3. The Permittee shall submit a groundwater gradient map for the "upper" aquifer annually. The map shall indicate the velocity in ft/year, the groundwater elevation for each well used to generate the map and the direction of flow. The map is due with the second biannual report required by Permit Condition 10.8.2. The map shall be submitted in electronic and paper copy format.

10.9. REQUEST FOR PERMIT MODIFICATION

If the Permittee or the Director determines the Groundwater Detection Monitoring program no longer satisfies the requirements of the regulations, the Permittee must, within 90 days of the determination, submit an application for a permit modification in accordance with Permit Condition 1.2 to make any appropriate changes to the program which will satisfy the regulations. *[40 CFR 264.98(h)]*

10.10. COMPLIANCE SCHEDULE

Reserved

11. SUMMARY

In accord with 40 CFR 264.101, the Permittee is required to conduct the following groundwater monitoring for all releases of hazardous waste or constituents from all solid waste management units(SWMUs) at the facility, regardless of the time at which waste was placed in such unit. This section of the Permit specifically identifies disposal Trenches 1 through 9 as identified in the Current Conditions Report (CCR) and Corrective Measures Study (CMS) as sources of gaseous emissions contaminating groundwater beneath the site. Corrective action is specified in accordance with this section and other portions of this Permit. This Permit contains Schedules of Compliance for such corrective action (where such corrective action cannot be completed prior to issuance of this Permit) and assurances of financial responsibility for completing such corrective action. The Permittee must implement corrective actions beyond the facility boundary, as necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Director that the Permittee was unable to undertake such actions. The Permittee is not relieved of the responsibility to clean up a release that has migrated beyond the facility boundary where off-site access may be denied. On-site and off-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for such corrective action shall be provided in accordance with the terms and conditions of this Permit as approved by the Director.

11.1. GROUNDWATER MONITORING

11.1.1. The Permittee shall use the groundwater monitoring network specified in Permit Condition 10.2.

11.1.2. The Permittee shall monitor the groundwater in order to determine the effectiveness of corrective action at the facility and to determine the extent of impacts to the groundwater. The hazardous constituents listed in Table 11.5 and their concentration limits comprise indicators for making such a determination.

11.1.3. The Permittee shall comply with this section of the Permit until the Director relieves the Permittee of Permit Condition 11.5. If the Permittee continues to conduct corrective action at the end of this Permit life, then the compliance period shall be extended until the Permittee demonstrates that the Groundwater Protection Standard has not been exceeded for at least three consecutive years at all the Point-of-Compliance (POC) wells or until the Permittee is relieved of the requirements of this section.

11.1.4. Groundwater Assessment

11.1.4.1. The Permittee must determine the concentration of hazardous constituents in Table 11.5 in the groundwater at the compliance point quarterly in accordance with Permit Condition 10.4 or as otherwise requested by the Division in writing, during the compliance period as specified in Permit Condition 11.1.2.

11.1.4.2. The Permittee must analyze samples from all Point of Compliance monitoring wells every year for the following constituents in Appendix IX, 40 CFR Part 264, during the compliance period: volatile and semi-volatile compounds, metals and inorganics, pesticides, herbicides and PCBs.

11.2. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the approved sampling techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Permit Condition 10.2 as required by Permit Condition 10.4.

11.3. REPORTING AND RECORDKEEPING

The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Permit Condition 11.2 in the operating record. The data must include all computations, calculated means, variances, and results of statistical tests. The Permittee shall report the results of all sampling conducted pursuant to Permit condition 11.2 in the reports required by Permit Condition 10.8.2.

11.4. WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee shall maintain a groundwater monitoring system, as specified in Permit Section 10.

11.5. GROUNDWATER PROTECTION STANDARD

11.5.1. The Permittee shall monitor the groundwater to determine whether the SWMUs are in compliance with the Groundwater Protection Standard established herein and to determine the effectiveness of corrective action activities at the facility as required in Permit Section 12. The following hazardous constituents and their concentration limits comprise the indicators in order to make this determination:

Table 11.5

	Monitored Groundwater Constituents [Indicators of Contamination]	Groundwater Protection Standard (mg/l)
1	Carbon Tetrachloride	0.005
2	Chloroform	0.005
3	Trichlorofluoromethane	0.005
4	Tetrachloroethene	0.005
5	Toluene	0.005
6	Trichloroethene	0.005

11.5.2. The Permittee shall monitor all the well**s** at the point-of-compliance, as described in Permit Section 10, for the indicators in Table 11.5 and as designated in the Permit Application Section 13.

11.6. MONITORING PROGRAM AND DATA EVALUATION

11.6.1. The Permittee shall determine groundwater quality as follows:

11.6.1.1. The Permittee shall collect, preserve, and analyze groundwater samples pursuant to Permit Section 10.

11.6.2. The Permittee shall analyze samples from all monitoring wells in accord with Permit Condition 11.2, and their concentrations shall be reported to the Director in accord with Permit Condition 11.3.

11.7. COMPLIANCE SCHEDULE

Reserved

12A SUMMARY

This section of the Permit applies to Trench 11 and Trench 12. Trench 11 and Trench 12 are disposal trenches for RCRA, Non-RCRA, and TSCA waste. All waste must be disposed of in accordance with Nevada state law as adopted by reference in NAC 444.8632. The Groundwater Detection Monitoring Program set forth in Permit Section 10 will be used to determine whether a release from the Regulated Unit(s)[1] has occurred. In the event it is determined that a release has occurred from a regulated unit, the Permittee will be required to prepare and implement a Corrective Action Program that satisfies the requirements of 40 CFR 264.100. Any document submitted in support of a Corrective Action Program required under this part shall be adopted by reference as if fully set forth herein.

12A.1 GROUNDWATER WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee shall install and maintain a groundwater monitoring system required by 40 CFR 264.100(d) and Section 10 of this Permit.

12A.1.1 The Permittee shall install and maintain additional groundwater monitoring wells at locations as specified by the Director below: *[40 CFR 264.100(a)(3) and (d)]*

Table 12A.1A

Well No.		Location
1	*(Reserved)*	*(Reserved)*
2		
3		
4		

12A.1.2 The Permittee shall construct and maintain the monitoring wells identified in Permit Condition 12A.1, in accordance with the plans and specifications meeting the requirements of 40 CFR 264.97(c). The plans and specifications shall consist of design drawings and design criteria applicable to all wells, as well as individual well specifications identifying depth, and location of screened intervals.

12A.1.3 All wells deleted from the monitoring program shall be plugged and abandoned in accordance with Permit Section 10.2.2. Well plugging and abandonment methods and certification shall be submitted to the Director within 60 days from the date the wells are removed from the monitoring program.

[1] 40 CFR 264.90(a)(2) All solid waste management units must comply with the requirements in 40 CFR 264.101. A surface impoundment, waste pile, and land treatment unit or landfill that receives hazardous waste after July 26, 1982 is hereinafter referred to as a "Regulated Unit".

Accordingly, Trench 10 meets the definition of a Regulated Unit. As this Unit is also a SWMU, the Division has opted to address any releases and associated corrective action(s) for Trench 10 as a SWMU in accordance with Section 12B of this Permit.

12A.1.4 Groundwater Protection Standard(s)

The Permittee shall implement a corrective action program to ensure that regulated units comply with the groundwater protection standards. *[40 CFR 264.100(d)]*

The following hazardous constituents and their concentration limits comprise the additional groundwater protection standards: *[40 CFR 264.93 and 264.94]*

Table 12A.1B

	Constituent	Concentration
1	*(Reserved)*	*(Reserved)*
2		
3		
4		
5		

12A.1.5 The Permittee shall monitor the wells identified in Table 12A.1A and at the point-of-compliance, and any wells between the point-of-compliance and the facility boundary. *[40 CFR 264.95 and 264.100(d)]*

12A.1.6 The Permittee shall monitor for the hazardous constituents identified in Table 12A.1B during the compliance period. *[40 CFR 264.93]*

12A.2 CORRECTIVE ACTION PROGRAM

12A.2.1 The Permittee shall at a minimum submit the documents in Permit Condition 12A.9 within 90 days of a confirmed exceedence of the Groundwater Protection Standards of Permit Section 10. The Permittee shall also submit any other documents as required by the Division in a manner consistent with establishing a timely Corrective Action Program.

12A.2.2 The Permittee shall begin and complete corrective action within a period specified by the Director. *[40 CFR 264.100(c)]*

12A.2.3 The Permittee shall implement a corrective action program that prevents hazardous constituents from exceeding their respective concentration limits (as required under Permit Condition 12A.2.4) at the compliance point by removing the hazardous waste constituents or by treating them in place. *[40 CFR 264.100(b)]*

12A.2.4 The Permittee shall conduct a corrective action program to remove or treat in place any hazardous constituents that exceed concentration limits in groundwater between the compliance point and the downgradient facility property boundary, in accordance with the procedures approved by the Director. *[40 CFR 264.100(e)]*

12A.2.5 If the groundwater protection standard is met during the compliance period, the Permittee shall continue corrective action to the extent necessary to ensure that the groundwater protection standard is not exceeded. If corrective action is required beyond the compliance period, it must continue until the groundwater protection standard has not been exceeded for three consecutive years. *[40 CFR 264.100(f)]*

12A.3 SAMPLING AND ANALYSIS PROCEDURES

The groundwater monitoring program must include sampling and analysis procedures that accurately measure hazardous constituents in groundwater and that are designed to ensure monitoring results that provide a reliable indication of the groundwater below the hazardous waste management area. The Permittee shall follow the techniques and procedures of Permit Section 10 when obtaining and analyzing samples from the groundwater monitoring wells described in Permit Condition 12A.1. *[40 CFR 264.97(d) and (e)]*

12A.3.1 Samples shall be collected using the techniques described in Permit Section 10.

12A.3.2 Samples shall be preserved and shipped in accordance with the procedures specified in the Groundwater Monitoring Plan in Permit Application Section 13.

12A.3.3 Samples shall be analyzed in accordance with the procedures specified in the Groundwater Monitoring Plan in Permit Application Section 13.

12A.3.4 Samples shall be tracked and controlled using the chain-of-custody procedures specified in the Groundwater Monitoring Plan in Permit Application Section 13.

12A.3.5 Field Sampling equipment shall be calibrated in accordance with the manufacturers' guidelines for each piece of equipment. Manufacturers' guidelines for each field-sampling device shall be maintained at the facility. The calibration data shall be recorded and maintained as part of the operating record of the facility.

12A.4 ELEVATION OF THE GROUNDWATER SURFACE

The Permittee shall determine the elevation of the groundwater surface as described in Permit Section 10. *[40 CFR 264.97(f)]*

12A.5 STATISTICAL PROCEDURES

When evaluating the monitoring results to determine the effects of corrective action measures, in accordance with Permit Condition 12A.6, the Permittee shall follow the statistical procedures as presented in Permit Application Section 13, Appendix 13E.

12A.6 MONITORING PROGRAM AND DATA EVALUATION

The Permittee shall establish and implement a groundwater monitoring program to demonstrate the effectiveness of the corrective action program. Groundwater monitoring shall be conducted and shall be as effective as the program for compliance monitoring under 40 CFR 264.97 and 40 CFR 264.99. The Permittee shall determine groundwater quality as follows:

12A.6.1 The Permittee shall collect, preserve and analyze samples in accordance with Permit Section 10.

12A.6.2 The Permittee shall determine the concentrations of the hazardous constituents in Permit Condition 12A.1.4, throughout the compliance period and any extensions due to corrective action implementation, to demonstrate conformance with the Groundwater Protection Standard. *[40 CFR 264.96]*

12A.6.3 The Permittee shall determine the concentration of hazardous constituents in groundwater at each monitoring well at the compliance point, at least quarterly. *[40 CFR 264.100(d)]*

12A.6.4 The Permittee shall analyze samples from all monitoring wells at the compliance point for all constituents contained in 40 CFR 264, Appendix IX (excluding dioxin/furans) at least once every year to determine if additional hazardous constituents are present in the uppermost aquifer. If the Permittee finds additional hazardous constituents present (*i.e.*, not listed in this section), their concentrations shall be reported to the Director in writing within seven days from completion of the analysis.

12A.6.5 The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer at least annually. *[40 CFR 264.99(e)]*

12A.6.6 The Permittee shall statistically compare the measured concentration of each monitored hazardous constituent with the corresponding concentration limit specified in the groundwater protection standard each time groundwater quality is determined in accordance with Permit Condition 12A.6.2. The Permittee must compare the groundwater quality measured at each point of the compliance monitoring well and any other specified wells in accordance with the procedures specified in Permit Condition 12A.5.

12A.7 RECORDKEEPING AND REPORTING

12A.7.1 The Permittee shall enter all monitoring, testing and analytical data obtained, according to Permit Condition 12A.6, in the operating record. The data must include all computations, calculated means, variances, and results of the statistical test(s) that the Director has specified. *[40 CFR 264.73(b)(6)]*

12A.7.2 The Permittee shall report, in writing, semi-annually to the Director on the effectiveness of the corrective action program. These reports shall be submitted each year on the dates indicated in the corrective action program until the corrective action program has been completed.

[40 CFR 264.100(g)]

12A.7.3 The Permittee shall submit the analytical results required by Permit Conditions 12A.4, 12A.5, 12A.6 and 12A.7 in accordance with the following schedule:

Bi-Annual Period		Due Date
1	January 1-June 30	September 30
2	July 1 – December 31	March 30

12A.8 REQUEST FOR PERMIT MODIFICATION

If the Permittee or the Director determines that the corrective action program established by this Permit no longer satisfies regulatory requirements, then the Permittee must submit an application for a permit modification within 90 days to make any appropriate changes to the program.

[40 CFR 264.100(h)]

12A.9 DOCUMENTS TO BE SUBMITTED

	Document	Due Date
1	Corrective Action Program	As required
2	Sampling and Analysis Plan	As required
3	Statistical Procedures	As required
4	Reserved	As required

12B SUMMARY AND APPLICABILITY

The objective of the corrective action program at a permitted hazardous waste management facility is to evaluate the nature and extent of releases of hazardous waste and/or constituents, and if necessary, implement corrective measures to protect human health and the environment. The Permittee is required to implement corrective action in accordance with 40 CFR 264.101 and the conditions of this Permit. The Permittee shall follow applicable guidance, including but not limited to the RCRA Corrective Action Plan, EPA 520-R-94-004, dated May 1994 (or most recent version). The Permittee shall conduct the following Corrective Actions for release(s) from formerly used disposal areas (Trench 1 through Trench 10) within the facility boundaries as specified below.

12B.1 AUTHORITY

40 CFR 264.101, adopted by the Director in NAC 444.8632, requires that permits issued by the State of Nevada must address corrective action for releases of hazardous waste including hazardous constituents from any Solid Waste Management Unit (SWMU) at the facility, regardless of when the waste was placed in the unit. NAC 445A.121 sets standards applicable to all 'waters of the state' and will be used to evaluate the potential impacts of releases. NRS 445A.575 and 445A.465 are the Nevada Revised Statutes which define the authority of the Director to regulate the discharge of hazardous constituents to the waters of the state. NRS 445A.400 defines pollutant and NRS 459.429 defines "hazardous substance." Also, Section 301(c) of the (Federal) Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) defines the area under the facility to be "natural resources managed or controlled" by the State of Nevada.

12B.2 CORRECTIVE ACTION SUMMARY AND HISTORY

12B.2.1 The RCRA Permit issued July 24, 1988 contained requirements for the Permittee to conduct a RCRA Facility Investigation (RFI) based on the findings of the RCRA Facility Assessment (RFA) conducted by Jacobs Engineering Group Inc., April 1987, under contract to EPA Region IX. The RFA originally identified six (6) Solid Waste Management Units (SWMUs). The Permit combined site characterization and groundwater monitoring well installation in the RFI process and the early work centered on site characterization. On August 20, 1990, the Permittee submitted a RFI Workplan designed to investigate the potential for a release from the SWMUs, to meet the requirements of the Permit and comments by EPA and NDEP. The RFI Workplan was approved by EPA on September 20, 1990. An RFI report, which details the results of the approved RFI Workplan was submitted by the Permittee on April 13, 1992. The corrective action objectives (*in italics*) and any related activities and/or documents submitted, to date, are identified below:

1. *To evaluate all data collected to date and develop a site conceptual model:* Data was used to prepare the Current Conditions Report (September 30, 1998), and Corrective Measures Study Report (April 4, 2003).

2. *Develop a new RFI Workplan, if necessary, to determine fully the nature and extent of any release of hazardous waste and/or hazardous constituents at or from the Facility:* The RFI Workplan submitted November 20 1998 was accepted and a new workplan was not required.

3. *To determine the impact to human health and the environment due to the release of hazardous constituents at the Facility:* This was addressed in the Current Conditions Report submitted September 30, 1998. Additionally, this was addressed in the Corrective Measures Study Report submitted April 4, 2003.

4. *To perform a Corrective Measure Study (CMS) to identify and evaluate alternatives for the corrective action necessary to prevent, mitigate and/or remediate any releases of hazardous wastes or hazardous constituents at or from the Facility:* The CMS was conducted and the resulting report submitted April 4, 2003.

5. *To implement the corrective measure or measures if required by the NDEP at the Facility:* Phase I SVE well installed March 1999. The SVE well has been maintained and continues to operate.

6. *To perform any other activities necessary to correct actual or potential threats to human health and/or the environment resulting from the release or potential release of hazardous waste or hazardous constituents at the Facility:* Ongoing, no specific activities identified/implemented.

Units identified as SWMUs are in the April 1987 RFA. The April 1987, Jacobs Engineering Group, RFA contains additional information on each SWMU listed. The August 20, 1990 RFI Workplan was designed to determine the source and the lateral and vertical extent of any release from each of these SWMUs. The RFI report and subsequent sampling events in the vadose zone monitoring points clearly show there has been a release of gaseous contaminants to the subsurface. The Interim Measures Plan contained in this Permit confirmed the transferal of gaseous contaminants to groundwater. The Permittee has implemented the CMS Implementation plan, dated March 24 1994, that was submitted for the PCB Draining and Flushing Area.

The Permittee has submitted documentation in support of Corrective Action activities at the facility and these are listed below. Refer to Permit Condition 12B.3 for required corrective action. The Director has approved the Corrective Measures Study Report and all prior documents.

12B.2.2 Documents submitted in support of the Corrective Action activities at the facility are:

1. Current Conditions Report (CCR) -- Sept 1998
2. RFI Workplan -- Nov 1998
3. RFI Report -- Dec 1998
4. CMS Workplan -- Feb 1999
5. Evaluation of Groundwater and Vadose zone Monitoring Network -- Nov 2000

6. Recommendations for SVE Well Placement as a part of Corrective Measures Study Report -- Dec 2002
7. Corrective Measures Study Report -- April 2003
8. Well Abandonment and Installation Report -- Aug 2003
9. Soil Vapor Extraction Well Installation and Corrective Measures Implementation Project -- May 2004
10. Corrective Measures Implementation Plan -- October 2005

12B.3 REQUIRED CORRECTIVE ACTION ACTIVITIES

12B.3.1 Corrective Measures Implementation

The Permittee submitted a Corrective Measures Implementation (CMI) Plan. This Plan proposes implementation of remedial alternatives as described in the Corrective Measures Study Report of April 2003. The selected remedial alternatives include natural attenuation and/or soil vapor extraction.

12B.3.2 Corrective Measures Implementation Schedule

The CMI Plan required in Permit Condition 12.B.3.1 includes a proposed schedule for implementation of corrective measures. The Director shall approve or modify the proposed schedule. The approved or modified schedule will be incorporated into Permit Condition 12B.6.

12B.4 CORRECTIVE ACTION FOR SWMU AND AOC

The Permittee must institute corrective action, as necessary, to protect human health and the environment for all releases of hazardous waste or constituents from any solid waste management unit at the facility, regardless of the time at which waste was placed in such unit.

Corrective action shall be specified in accordance with this permit section. This section will contain schedules of compliance for such corrective action and assurances of financial responsibility for completing such corrective action.

12.B.4.1 SWMUs and AOCs Identified by the RFA:

The Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) identified by the initial RCRA Facility Assessment (RFA), any subsequent investigations, or other means, as listed in Solid Waste Management Unit and Area of Concern Summary (Permit Section 12B.7).

12.B.4.2 Additional SWMUs or AOCs

Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, releases or other means. As used in this part of the Permit, the terms "discover", "discovery", and "discovered" refer to the date on which the Permittee or a Division representative either, (1) visually observe evidence of a new SWMU or AOC, (2) visually observe evidence of a previously unidentified release of hazardous constituents to the environment, or (3) receive information which suggests the presence of a new release of hazardous waste or hazardous constituents to the environment.

12.B.4.3 Contamination Beyond Facility Boundary

The Permittee shall implement corrective actions beyond the facility boundary where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Director that, despite the Permittee's best efforts, as determined by the Director, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of responsibility to clean up a release that has migrated beyond the facility boundary where off site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for completion of such off-site corrective action will be required.

12B.5 NOTIFICATION and ASSESSMENT REQUIREMENTS for NEWLY IDENTIFIED SWMUS and AOCS

12.B.5.1 Notification

The Permittee shall notify the Director in writing, within fifteen (15) calendar days of discovery, of any additional AOCs and/or SWMUs discovered under Permit Condition 12.B.4.2. The notification shall include, at a minimum, a unique sequential identification number for the SWMU or AOC, the location of the SWMU or AOC, and all available information pertaining to the nature of the release (e.g., media affected, hazardous constituents released, magnitude of release, etc.).

12.B.5.2 Assessment Report

The Permittee shall prepare and submit to the Director, within ninety (90) calendar days of notification, an Assessment Report (AR) for each SWMU or AOC identified under Permit Condition 12.B.4.2. At a minimum, the AR shall provide the following information:

1. The unique sequential identification for the SWMU or AOC.
2. Location of unit(s) on a topographic map of appropriate scale such as required under 40 CFR 270.14(b)(19).
3. Designation of type and function of unit(s).
4. General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings).
5. Dates the unit(s) operated.

6. Specification of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on 40 CFR Part 261, Appendix VIII or 40 CFR Part 264 Appendix IX constituents contained in the wastes.
7. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (including groundwater, soil, air, surface water, and/or sediment data).

12.B.5.3 Director's Determination

The Director shall determine the need for further investigations at the SWMUs or AOCs covered in the AR. If the Director determines that such investigations are needed, the Permittee shall be required to prepare a plan for such investigations as required by the Director. If the Director determines further investigation of a SWMU or SWMUs or AOC is required, the Permittee will submit a modification to the Permit in accordance with 40 CFR Part 270 Subpart D.

12B.6 COMPLIANCE SCHEDULE

	Item	***Date***
1	Continue to operate SVE well	Until further notice
2	*Reserved*	*Reserved*
3	*Reserved*	*Reserved*
4		

12B.7 SOLID WASTE MANAGEMENT UNIT(S) and AREA(S) OF CONCERN SUMMARY

Table 12B.7A

List of All Solid Waste Management Units (SWMUs), Areas of Concern (AOCs)	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
1-9	Trench 1 through Trench 9
10	Low Temperature Thermal Desorption (LTTD) System—under closure
11	CMU 1 - PCB/RCRA - container storage
12	CMU 6 - Dry Hazardous Waste Storage Area 2 (DHWSA #2)
13	CMU 7 – container storage
14	CMU 16 – container storage
15	CMU 17 - Dry Hazardous Waste Storage Area 3 (DHWSA #3)
16	Tank 4 through Tank 8 – PCB storage
17	Tank 15- leachate storage
18	Treatment Tanks 1, 2 & 3
19	Treatment Tanks 18 & 19

20	Evaporation Tank - Truck Wash Pad
21	*Reserved*

Table 12B.7B

Units Regulated Under 40 CFR 264 (RCRA-regulated units)	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
RCRA 1	Trench 10
RCRA 2	Trench 11
RCRA 3	Trench 12
RCRA 4	*Reserved*

Table 12B.7C

SWMUs and AOCs Requiring No Further Action at this Time	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
NFA 1	The "Terminator"
NFA 2	WCSA 1
NFA 3	WCSA 2
NFA 4	DHWSA 1
NFA 5	*Reserved*

Table 12B.7D

SWMUs and AOCs Requiring a RCRA Facility Investigation (RFI)	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
RFI 2	*Reserved*

Table 12B.7E

SWMUs and AOCs Requiring a Corrective Measures Study	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
CMS 2	*Reserved*

Table 12B.7F

SWMUs and AOCs Requiring a Corrective Measures Implementation Plan	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
1-9	Trench 1 through Trench 9
RCRA 1	Trench 10
Reserved	*Reserved*

Table 12B.7G

SWMUs and AOCs in Corrective Action	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
1-9	Trench 1 through Trench 9
RCRA 1	Trench 10
Reserved	*Reserved*

Table 12B.7H

SWMUs and AOCs Requiring Land Use Controls	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
1-9	Trench 1 through Trench 9
RCRA 1	Trench 10
RCRA 2	Trench 11
RCRA 3	Trench 12
Reserved	*Reserved*

Table 12B.7I

SWMUs and AOCs Transferred to Another Environmental Program	
SWMU/AOC ID No/Letter	***SWMU / AOC Description or Name***
TRANS 1	*Reserved*

13. SUMMARY

This Section applies to the closed Trench 10 and to the currently operating Trenches 11 and 12 when those units are closed. The post-closure care for Trenches 11 and 12 must begin after completion of closure of these units and shall continue for 30 years after that date, and must consist of monitoring, reporting and maintenance. *[40 CFR 264.117]*

13.1. UNIT IDENTIFICATION

The Permittee shall provide post-closure care for the following hazardous waste management units, subject to the terms and conditions of this Permit, and as described below:

Table 13.1

Type of Waste Unit		Unit Description	Max Waste Inventory	Waste Description	Date of Certification of Closure
1	Landfill	Trench 10	~ 824,638 yd^3	Various	8/8/97
2	Landfill	Trench 11	~2.36(10^6) yd^3	RCRA and TSCA	*N/A*
3	Landfill	Trench 12	~1.66(10^6) yd^3	RCRA and TSCA	*N/A*
4	*Landfill*	*Reserved*		*Reserved*	

13.2. POST-CLOSURE PROCEDURES AND USE OF PROPERTY

13.2.1. The Permittee shall conduct post-closure care for each hazardous waste management unit listed in Permit Condition 13.1 above, to begin after completion of closure of the unit and continue for 30 years after the date of closure of the last unit listed above. The 30-year post-closure care period may be shortened upon application and demonstration approved by the Director that the facility is secure, or may be extended by the Director if he finds this is necessary to protect human health and the environment. *[40 CFR 264.117(a)]*

13.2.2. The Permittee shall maintain and monitor the groundwater as required by either Permit Section 10 or 11 and comply with all other applicable requirements of 40 CFR Part 264 Subpart F and Permit Section 10 during the post-closure period. *[40 CFR 264.117(a)(1)]*

13.2.2.1. The Permittee shall comply with the 40 CFR 264.310(b) requirements for landfills and as follows:

13.2.2.1.1. The Permittee shall comply with the post-closure requirements of Permit Application Section 17.

13.2.2.1.2. Maintain the integrity and effectiveness of the final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, or other events;

13.2.2.1.3. Maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of 40 CFR Subpart F;

13.2.2.1.4. Prevent run-on and run-off from eroding or otherwise damaging the final cover; and

13.2.2.1.5. Protect and maintain surveyed benchmarks used in complying with the surveying and recordkeeping requirements of 40 CFR 264.309.

13.2.2.2. The Permittee shall annually survey the elevation of the closure caps to verify the cap is not eroding or otherwise compromised and submit the results to the Director.

13.2.3. The Permittee shall comply with all security requirements, as specified in Permit Application, Sections 4 and 17. *[40 CFR 264.117(b)]*

13.2.4. The Permittee shall not allow any use of the units designated in Permit Condition 13.1 which will disturb the integrity of the final cover, liners, any components of the containment system, or the function of the facility's monitoring systems during the post-closure care period. *[40 CFR 264.117(c)]*

13.2.5. The Permittee shall implement the Post-Closure Plan in Permit Application Section 17. All post-closure care activities must be conducted in accordance with the provisions of the Post-Closure Plan. *[40 CFR 264.117(d) and 264.118(b)]*

13.2.6. Inspections
The Permittee shall inspect the components, structures, and equipment at the site (e.g. fences, gates, signs) in accordance with Permit Application Section 17. *[40 CFR 264.117(a)(1)(ii)]*

13.2.7. The Permittee shall monitor moisture migration through the final cover system of Trench 11 using a lysimeter system in accordance with Permit Application Section 17 for 10 years following initial installation of the lysimeter. Data from this monitoring will be used by the Director to assess the need for similar monitoring for the final cover of Trench 12 after it closes.

13.3. NOTICES AND CERTIFICATION

13.3.1. No later than 60 days after Certification of Closure of each permitted hazardous waste disposal unit, the Permittee shall submit to the Director a record of the type, location, and quantity of hazardous wastes disposed of within each cell or other disposal unit of the facility. For hazardous wastes disposed of before January 12, 1981, the Permittee shall identify the type, location, and quantity of the hazardous wastes to the best of his knowledge and in accordance with any records that have been kept. *[40 CFR 264.119(a)]*

13.3.2. Within 60 days of Certification of Closure of each hazardous waste disposal unit, the Permittee shall: *[40 CFR 264.119(b)]*

13.3.2.1. Record, in accordance with Nevada law, a notation on the deed to the facility property or on some other instrument that is normally examined during the title search that will in perpetuity notify any potential purchaser of the property that:

1. The land has been used to manage hazardous wastes;
2. Its use is restricted under 40 CFR Part 264 Subpart G regulations; and
3. The survey plat and record of the type, location, and quantity of hazardous wastes disposed of within each cell or other hazardous waste disposal unit of the facility have been filed with the Director and the local zoning authority with jurisdiction over local land use.

13.3.3. If the Permittee or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous wastes and hazardous waste residues, the liner, if any; or contaminated soils, then he shall request a modification to the Permit in accordance with the applicable requirements in 40 CFR Parts 124 and 270. The Permittee or any subsequent operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of 40 CFR 264.117(c). *[40 CFR 264.119(c)]*

13.3.4. No later than 60 days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall submit to the Director, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan. The Permittee and an independent Nevada registered professional engineer must sign the certification. Documentation supporting the qualified Professional Engineer's certification must be furnished to the Director upon request until the Director releases the Permittee from the financial assurance requirements for post-closure care under 40 CFR 264.145(i). *[40 CFR 264.120]*

13.4. POST CLOSURE COST ESTIMATE AND FINANCIAL ASSURANCE

13.4.1. The Permittee shall prepare and maintain a written estimate in current dollars for the cost of closing and providing post closure care of the facility and maintain financial assurance during the post-closure period in compliance with Permit Section 14 and Permit Application Section 18. *[40 CFR 264.145]*

13.4.2. The Permittee shall demonstrate to the Director that the value of the financial assurance mechanism exceeds the remaining cost of post-closure care, in order for the Director to approve a release of funds. *[40 CFR 264.145(a)(10)]*

13.4.3. The Permittee or any other person authorized to conduct post-closure care shall submit itemized bills to the Director when requesting reimbursement for post-closure care. *[40 CFR 264.145(a)(11)]*

13.4.4. In the event of a change in the facility design or operation that affects the post-closure plan, the Permittee shall re-calculate the post-closure cost estimate and submit it to the Director within 60 days after the effective date of the change. Any required adjustments to the amount of financial assurance required shall be made after the post-closure cost estimate is revised.

13.5. POST-CLOSURE PERMIT MODIFICATIONS

The Permittee must request a permit modification to authorize a change in the approved Post-Closure Plan. This request must be in accordance with applicable requirements of Permit Condition 1.2, and must include a copy of the proposed amended Post-Closure Plan for approval by the Director. The Permittee shall request a permit modification whenever changes in operating plans or facility design affect the approved Post-Closure Plan, there is a change in the expected year of final closure, or other events occur during the active life of the facility that affect the approved Post-Closure Plan. The Permittee must submit a written request for a permit modification at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the Post-Closure Plan. *[40 CFR 264.118(d)]*

14. SUMMARY

The Permittee shall comply with the Financial Assurance requirements of this section, and establish and/or maintain a funding mechanism for the facility for Closure, Post-Closure and any required Corrective Action measures including an Insurance Policy to cover Sudden/Non-Sudden Liability for the facility. At this time, the facility is proposed to be closed with post-closure monitoring and care; and as such, shall include a funding mechanism for the post-closure of the facility in accordance with the Closure Plan and State requirements.

14.1 APPLICABILITY

The property site is owned by the State of Nevada and is leased to American Ecology, Inc. as the Permittee. As such, the facility is exempt from complying with the 40 CFR Part 264 Subpart H requirements, except as provided otherwise in this Permit. Therefore, the Director has imposed alternative requirements for financial assurance set out in this Permit or in an enforceable document where the Director:

1. Prescribes alternative requirements for the regulated unit or units under 40 CFR 264.90(f), 40 CFR 264.101, and/or 40 CFR 264.110(c); or
2. Finds Nevada Administrative Code (NAC) 444.846 applies.

14.2 MODIFICATIONS

For changes or modifications to the facility that may affect the financial assurance requirements, the Permittee shall comply with the requirement of Permit Condition 1.2.

14.3 FINANCIAL ASSURANCE FOR FACILITY CLOSURE, POST-CLOSURE AND CORRECTIVE ACTION

The Permittee shall demonstrate continuous compliance with 40 CFR 264.142, 264.143, 264.144, 264.145, and 264.146 by following the Financial Assurance procedures of Permit Application Section 18 and by providing documentation of financial assurance in at least the amount of the cost estimates required by Permit Conditions 14.4, 14.6 and 14.8. Any proposed changes in the financial assurance mechanisms must be approved by the Director pursuant to 40 CFR 264.143, 264.145 or 264.149 and in accordance with Permit Condition 1.2. The Permittee shall comply with both Permit Application Section 18 and the requirements of this section.

14.4 COST ESTIMATE FOR CLOSURE

The Permittee shall maintain a detailed written estimate, in current dollars, of the cost of closing the entire facility in accordance with the requirements in 40 CFR 264.111 through 40 CFR 264.115 and applicable closure requirements in 40 CFR 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, 264.351, 264.601 through 264.603, and 264.1102. *[40 CFR 264.142(a)]*

14.4.1. The closure cost estimate shall equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by the facility's Closure Plan required by 40 CFR 264.112(b).
[40 CFR 264.142(a)(1)]

14.4.2. The closure cost estimate shall be based on the costs of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the Permittee (*See definition of Parent Corporation in 40 CFR 264.141(d)*). The Permittee may use costs for on-site disposal if it can be demonstrated that on-site disposal capacity will exist at all times over the life of the facility. *[40 CFR 264.142 (a)(2)]*

14.4.3. The closure cost estimate may not incorporate any salvage value that may be realized with the sale of hazardous wastes, or non-hazardous wastes if applicable under 40 CFR 264.113(d), facility structures or equipment, land, or other assets associated with the facility at the time of partial or final closure. *[40 CFR 264.142 (a)(3)]*

14.4.4. The Permittee may not incorporate a zero cost for hazardous wastes, or non-hazardous wastes if applicable under 40 CFR 264.113(d), that might have economic value. *[40 CFR 264.142 (a)(4)]*

14.4.5. During the active life of the facility, the Permittee must annually adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of October 15th. The adjustment may be made by recalculating the maximum costs of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its *Survey of Current Business*, as specified in 40 CFR 264.142(b). The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. Adjustment is made by multiplying the closure cost estimate by the inflation factor. *[40 CFR 264.142 (b)]*

14.4.6. During the active life of the facility, the Permittee shall revise the closure cost estimate no later than 30 days after the Director has approved the request to modify the closure plan, if the change in the closure plan increases the cost of closure. The revised closure cost estimate must be adjusted for inflation as specified in Permit Condition 14.5.5. *[40 CFR 264.142 (c)]*

14.4.7. The Permittee must keep the following at the facility during the operating life of the facility:

1. The latest Closure Cost Estimate prepared in accordance with Permit Condition 14.4 and,
2. When this estimate has been adjusted in accordance with Permit Condition 14.4.5, the latest adjusted closure cost estimate along with documentation of how the adjusted cost estimate was derived.

14.5 FINANCIAL ASSURANCE FOR CLOSURE

The Permittee shall establish and maintain financial assurance for closure of the facility in accordance with the approved closure plan and comply with the requirements specified below.

Any change in the financial assurance mechanism must be approved by the Director in accordance with Permit Condition 1.2.

14.5.1. Closure Fund

14.5.1.1. The Permittee may satisfy the requirements of this section by establishing a closure fund to comply with NAC 444.846 and which conforms to the requirements of this section. The specific wording of any agreement associated with the closure fund must be approved by the Director.

14.5.1.2. Payments into the fund must be made by the Permittee over the term of the RCRA permit or over the remaining operating life of the facility as estimated in the Closure Plan, whichever period is shorter and complies with the Director's requirements. This period is hereafter referred to as the "pay-in period." The payments into the closure fund shall be made as required by the Director.

14.5.1.3. If the Permittee establishes a closure fund and the value of that fund is less than the current closure cost estimate, the Permittee shall either submit payment into the fund or provide an alternative financial assurance instrument, as approved by the Director, to ensure coverage for the full amount of the current closure cost estimate.

14.5.1.4. The Permittee may accelerate payments into the fund or he may deposit the full amount of the current closure cost estimate at the time the fund is established or at any time thereafter.

14.5.1.5. Whenever the current closure cost estimate changes, the Permittee must compare the new cost estimate with the most recent annual valuation of the closure fund. If the value of the closure fund is less than the amount of the new closure cost estimate, then the Permittee, within 60 days after the change in the cost estimate, must either deposit an amount into the closure fund so that its value after this deposit equals the amount of the current closure cost estimate, or obtain other financial assurance, approved by the Director, as necessary to cover the difference.

14.5.1.6. If the value of the closure fund is greater than the combined total amount of both the current closure cost estimate and the post closure cost estimate, the Permittee may submit a written request to the Director for refund of the amount in excess of the current closure cost estimate. One written request for refund may be submitted each year, and such request shall be made within 30 days after the annual closure cost update due each October 15th.

14.5.1.7. Within 60 days after receiving a request from the Permittee for release of funds as specified in Permit Condition 14.5.1.6, the Director will provide a written response to the Permittee identifying the amount approved to be released from the closure fund.

14.5.1.8. After beginning partial or final closure, the Permittee or another person authorized to conduct partial or final closure may request reimbursements from the established closure fund for partial or final closure expenditures by submitting itemized bills to the Director.

Request for partial closure reimbursements may only be made if sufficient funds are remaining in the closure fund to cover the maximum costs of closing the facility over its remaining operating life and providing for post-closure care of the facility. Within 60 days after receiving bills for partial or final closure activities, the Director shall issue a written response specifying the amount of the reimbursement authorized, if the Director determines that the partial or final closure expenditures are in accordance with the approved closure plan, or otherwise justified. If the Director has reason to believe that the maximum cost of closure and maintenance over the remaining life of the facility and post-closure period will be greater than the existing value of the closure fund, reimbursements of such amounts may be withheld, as deemed prudent until determined in accordance with 40 CFR 264.143(i) that the Permittee is no longer required to maintain financial assurance for final closure of the facility. If the Director does not make such reimbursements, he will provide the Permittee with a detailed written statement of reasons. *[40 CFR 264.143(a)(10)]*

14.5.1.9. The Director may agree to termination of the closure fund when:

1. The Permittee substitutes alternate financial assurance, as accepted by the Director; or
2. The Director releases the Permittee from the requirements of this section in accordance with Permit Condition 14.5.3.

14.5.2. Use of multiple financial mechanisms

The Permittee may satisfy the requirements of this section by establishing more than one financial mechanism for the facility. These mechanisms are limited to funds, surety bonds guaranteeing payment into a fund, and insurance. The combination of mechanisms must provide financial assurance for an amount at least equal to the current closure cost estimate. The Director may use any or all of these mechanisms or NAC 444.846 to provide for closure of the facility. *[40 CFR 264.143(g)]*

14.5.3. Release of the Permittee from the Requirements of Financial Assurance for Closure

Within 60 days after receiving certifications from the Permittee and a qualified Professional Engineer that final closure has been completed in accordance with the approved closure plan, the Director will notify the Permittee in writing that the Permittee is no longer required by this permit section to maintain financial assurance for final closure of the facility, unless the Director has reason to believe that final closure has not been in accordance with the approved closure plan. The Director shall provide the Permittee a detailed written statement of any such reason to believe that closure has not been in accordance with the approved closure plan.

[40 CFR 264.143(c)]

14.6 COST ESTIMATE FOR POST-CLOSURE

The Permittee shall maintain a detailed written estimate, in current dollars, of the annual cost of providing at least 30 years of post-closure care and maintenance of the facility in accordance with the approved post-closure plan and the requirements in 40 CFR 264.117 through 40 CFR 264.120, and applicable post-closure regulations in 40 CFR 264.228, 264.258, 264.280, 264.310, and 264.603. *[40 CFR 264.144]*

14.6.1. The post-closure cost estimate must be based on the costs of hiring a third party to conduct the post-closure care activities. A third party is a party who is neither a parent nor a subsidiary of the Permittee. (*See definition of Parent Corporation in 40 CFR264.141(d)*)
[40 CFR 264.144(a)(1)]

14.6.2. The post-closure cost estimate is calculated by multiplying the estimated annual cost of providing the post-closure care required under 40 CFR 264.117 through 40 CFR 264.120, by at least 30 years of required post-closure care.

14.6.3. During the active life of the facility, the Permittee must adjust the post-closure cost estimate for inflation within 60 days prior to the anniversary date of October 15th. Adjustment shall be made by multiplying the post-closure cost estimate by the inflation factor as described in Permit Condition 14.4.5. The result is the adjusted post-closure cost estimate. *[40 CFR 264.144(b)]*

14.6.4. During the active life of the facility, the Permittee shall revise the post-closure cost estimate within 30 days after the Director has approved a request to modify the post-closure plan, if the change in the post-closure plan increases the cost of post-closure care. The revised post-closure cost estimate must be adjusted for inflation as specified in Permit Condition 14.6.3.
[40 CFR 264.144(c)]

14.6.5. The Permittee must keep the following at the facility during the operating life of the facility:

1. The latest post-closure cost estimate prepared in accordance with Permit Condition 14.6, and, *[40 CFR 264.144(a) & (c)]*
2. When this estimate has been adjusted in accordance with Permit Condition 14.6.3, the latest adjusted post-closure cost estimate along with documentation of how the adjusted cost estimate was derived.. *[40 CFR 264.144(b)]*

14.7 FINANCIAL ASSURANCE FOR POST-CLOSURE

The Permittee shall establish and maintain financial assurance for post-closure care of the facility in accordance with the approved post-closure plan and comply with the requirements specified below. Any change in the financial assurance mechanism must be approved by the Director in accordance with Permit Condition 1.2.

14.7.1. Post-Closure Fund

14.7.1.1. The Permittee may satisfy the requirements of this section by establishing a post-closure fund to comply with NAC 444.846, and which conforms to the requirements of this section. The specific wording of any agreement associated with the post-closure fund must be approved by the Director. A single fund may be established to provide the combined financial assurance amount for both the closure and post-closure cost estimates.

14.7.1.2. Payments into the fund may be made by the Permittee over the term of the RCRA Permit or

over the remaining operating life of the facility as estimated in the closure plan, whichever period is shorter and complies with the Director's requirements. The payments into the post-closure fund shall be made as required by the Director.

14.7.1.3. If the Permittee establishes a fund and the value of that fund is less than the current post-closure cost estimate, the Permittee shall either submit payment into the fund or provide an alternative financial assurance instrument, as approved by the Director, to ensure coverage for the full amount of the current post-closure cost estimate.

14.7.1.4. The Permittee may accelerate payments into the fund or may deposit the full amount of the current post-closure cost estimate at the time the fund is established or anytime thereafter.

14.7.1.5. Whenever the current post-closure cost estimate changes, the Permittee must compare the new cost estimate with the most recent annual valuation of the fund. If the value of the fund is less than the amount of the new estimate, then the Permittee, within 60 days after the change in the cost estimate, must either deposit an amount into the fund so that its value after this deposit at least equals the amount of the current post-closure cost estimate, or obtain other financial assurance, approved by the Director, as necessary to cover the difference.

14.7.1.6. During the operating life of the facility, if the value of the fund is greater than the combined total amount of both the current closure cost estimate plus the post-closure cost estimate, the Permittee may submit a written request to the Director for release of the amount in excess of the current closure and post-closure cost estimate. One written request for release may be submitted each year, and such request shall be made within 30 days after the annual closure cost update due each October 15th.

14.7.1.7. Within 60 days after receiving a request from the Permittee for release of funds as specified in Permit Condition 14.7.1.6, the Director will provide a written response to the Permittee identifying the amount approved to be released from the fund.

14.7.1.8. During the period of post-closure care, the Director may approve a release of funds if the Permittee demonstrates to the Director that the value of the fund exceeds the remaining cost of post-closure care.

14.7.1.9. The Permittee or any other person authorized to conduct post-closure care may request reimbursements from the established fund for post-closure care expenditures by submitting itemized bills to the Director. Request for post-closure care reimbursements may only be made if sufficient funds are remaining in the fund to cover the maximum costs of providing the remaining post-closure care of the facility. Within 60 days after receiving bills for post-closure care activities, the Director shall issue a written response specifying the amount of reimbursement authorized, if the Director determines that the post-closure care expenditures are in accordance with the approved post-closure plan or otherwise justified. If the Director has reason to believe that the maximum cost of post-closure care over the remaining life of the facility will be greater than the existing value in the post-closure fund, reimbursements of such amounts may be withheld. If the Director does make such reimbursements, he will

provide the Permittee with a detailed written statement of reasons.

14.7.1.10. The Director may agree to termination of the fund when:

1. The Permittee substitutes alternate financial assurance, as accepted by the Director; or
2. The Director releases the Permittee from the requirements of this section in accordance with Permit Condition 14.7.2.

14.7.2. Release of the Permittee from the requirements of financial assurance for Post-Closure Care
Within 60 days after receiving certifications from the Permittee and a qualified Professional Engineer that the post-closure care period has been completed in accordance with the approved plan, the Director will notify the Permittee in writing that the Permittee is no longer required by this section to maintain financial assurance for post-closure of the facility, unless the Director has reason to believe that post-closure care has not been in accordance with the approved plan. The Director shall provide the Permittee a detailed written statement of any such reason to believe that post-closure care has not been in accordance with the approved post-closure plan.

14.8 COST ESTIMATE FOR CORRECTIVE ACTION

The Permittee shall establish and maintain financial assurance for any remedial or corrective actions required at the facility as a result of a release of hazardous waste and in accordance with the corrective measures study and the requirements specified below. Any change in the financial assurance mechanism must be approved by the Director in accordance with Permit Condition 1.2.

14.8.1. The cost estimate for corrective action must be based on the costs of hiring a third party to conduct the corrective action activities. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (*See definition of Parent Corporation in 40 CFR 264.141(d)*).

14.8.2. The corrective action cost estimate is calculated by multiplying the annual corrective action cost estimate by the number of years of corrective action required by the Director.

14.8.3. During the active life of the facility, the Permittee must annually adjust the corrective action cost estimate for inflation within 60 days prior to the annual cost review date of October 15th. The adjustment may be made by either recalculating the maximum costs of corrective action in current dollars, or by multiplying the corrective action cost estimate by the inflation factor as described in Permit Condition 14.4.5. The result is the adjusted corrective action cost estimate.

14.8.4. During the active life of the facility, the Permittee shall revise the corrective action cost estimate within 30 days after the Director has approved a request to modify the Corrective Action Plan, if the change in the Corrective Action Plan increases the cost of corrective action. The revised corrective action cost estimate must be adjusted for inflation as specified in Permit Condition 14.8.3.

14.8.5. The Permittee must keep the following at the facility during the operating life of the facility:

1. The latest corrective action cost estimate prepared in accordance with 40 CFR 264.101 and Permit Condition 14.8.2 and,
2. When this estimate has been adjusted in accordance with Permit Condition 14.8.3, the latest adjusted corrective action cost estimate along with documentation of how the adjusted cost estimate was derived.

14.8.6. Use of multiple financial mechanisms

The Permittee may satisfy the requirements of this section by establishing more than one financial mechanism. The mechanisms shall be approved by the Director and must provide financial assurance for an amount at least equal to the current corrective action cost estimate. The Director may use selected mechanisms in 40 CFR Subpart H to provide for corrective action at the facility.

14.8.7. Release from the Requirements of Financial Assurance for Corrective Action

After receiving certifications from the Permittee and a qualified Professional Engineer that corrective action has been completed in accordance with the approved plans, and the Project Coordinator has accepted the final corrective action report and issued a letter indicating no further action, the Director will notify the Permittee that he is no longer required to maintain financial assurance for corrective action, unless the Director has reason to believe that corrective action has not been in accordance with the approved corrective action plan. The Director shall provide the Permittee with a detailed written statement of any such reason to believe that corrective action care has not been in accordance with the approved corrective action plan.

14.9 USE OF A MECHANISM FOR FINANCIAL ASSURANCE OF CLOSURE, POST-CLOSURE CARE AND CORRECTIVE ACTION

The Permittee may satisfy the requirements for financial assurance for closure, post-closure care and corrective action for the facility by using a combination of either a fund, surety bond paying into a fund, or insurance that meets the specifications for the mechanisms in both 40 CFR 264.143 and 264.145, or an equitable State mechanism approved by the Director. The amount of funds available through the mechanism must be no less than the sum of funds that would be available if separate mechanisms had been established and maintained for financial assurance of closure, post-closure care, and corrective action individually. *[40 CFR 264.146]*

14.10 LIABILITY REQUIREMENTS

The Permittee shall demonstrate continuous compliance with the requirement of 40 CFR 264.147(a) to establish and maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs. The Permittee shall also demonstrate continuous compliance with the 40 CFR 264.147(b) requirement to maintain liability coverage for non-sudden accidental occurrences in an amount of at least $3 million per occurrence, with an annual aggregate of at least $6 million, exclusive of legal defense costs.

14.10.1. Coverage for Sudden Accidental Occurrences

14.10.1.1. The Permittee must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The Permittee must have and maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs. This liability coverage may be demonstrated as follows: *[40CFR 264.147(a)]*

1. The Permittee may demonstrate the required liability coverage by having liability insurance as specified in this paragraph.
2. Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in 40 CFR 264.151(i). The wording of the certificate of insurance must be identical to the wording specified in 40 CFR 264.151(j). The Permittee must submit a signed duplicate original of the endorsement or the certificate of insurance to the Director. If requested by the Director, the Permittee must provide a signed duplicate original of the insurance policy.
3. Each insurance policy must be issued by an insurer, which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States, including Nevada.

14.10.1.2. The Permittee shall notify the Director in writing within 30 days whenever:

1. A claim results in a reduction in the amount of financial assurance for liability coverage provided by a financial instrument authorized in Permit Condition 14.10.1.1; or
2. A Certification of Valid Claim for bodily injury or property damages caused by a sudden or non-sudden accidental occurrence arising from the operation of a hazardous waste treatment, storage, or disposal facility is entered between the Permittee and third-party claimant for liability coverage under Permit Condition 14.10.1.1; or
3. A final court order establishing a judgment for bodily injury or property damage caused by a sudden or non-sudden accidental occurrence arising from the operation of a hazardous waste treatment, storage, or disposal facility is issued against the Permittee or an instrument that is providing financial assurance for liability coverage under Permit Condition 14.10.1.1.

14.10.2. Coverage for Non-sudden Accidental Occurrences

14.10.2.1. The Permittee must demonstrate financial responsibility for bodily injury and property damage to third parties caused by non-sudden accidental occurrences arising from operations of the facility or group of facilities. The Permittee must establish and maintain liability coverage for non-sudden accidental occurrences in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million, exclusive of legal defense

costs. As the Permittee must meet the requirements of this section, the Permittee may combine the required per-occurrence coverage levels for both sudden and non-sudden accidental occurrences into a single per-occurrence level, and combine the required annual aggregate coverage levels for both sudden and non-sudden accidental occurrences into a single annual aggregate level. Owners or operators who combine coverage levels for sudden and non-sudden accidental occurrences must maintain liability coverage in the amount of at least $4 million per occurrence and $8 million annual aggregate. This liability coverage may be demonstrated as specified below: *[40 CFR 2643.147(b)]*

1. The Permittee may demonstrate the required liability coverage by having liability insurance as specified in this paragraph.
2. Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in 40 CFR 264.151(i). The wording of the certificate of insurance must be identical to the wording specified in 40 CFR 264.151(j). The Permittee must submit a signed duplicate original of the endorsement or the certificate of insurance to the Director. If requested by the Director, the Permittee must provide a signed duplicate original of the insurance policy.
3. Each insurance policy must be issued by an insurer, which at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States, including Nevada .

14.10.2.2. The Permittee shall notify the Director in writing within 30 days whenever:

1. A claim results in a reduction in the amount of financial assurance for liability coverage provided by a financial instrument authorized in Permit Condition 14.10.2.1; or
2. A Certification of Valid Claim for bodily injury or property damages caused by a sudden or non-sudden accidental occurrence arising from the operation of a hazardous waste treatment, storage, or disposal facility is entered between the Permittee and third-party claimant for liability coverage under Permit Condition 14.10.2.1; or
3. A final court order establishing a judgment for bodily injury or property damage caused by a sudden or non-sudden accidental occurrence arising from the operation of a hazardous waste treatment, storage, or disposal facility is issued against the Permittee or an instrument that is providing financial assurance for liability coverage under Permit Condition 14.10.2.1.

14.10.3. Adjustments by the Director

If the Director determines that the levels of financial responsibility required are not consistent with the degree and duration of risk associated with treatment, storage, or disposal at the facility, the Director may adjust the level of financial responsibility required under this section as may be necessary to protect human health and the environment. The adjusted level will be based on the Director's assessment of the degree and duration of risk associated with the operation of the facility. In addition, if the Director determines that there is a significant risk to

human health and the environment from non-sudden accidental occurrences resulting from the operations of a facility that is not a surface impoundment, landfill, or land treatment facility, he may require that the Permittee comply with paragraph 14.10.2. The Permittee must furnish to the Director, within a reasonable time, any information, which the Director requests to determine whether cause exists for such adjustments of level or type of coverage. Any adjustment of the level or type of coverage for a facility that has a permit will be treated as a permit modification under 40 CFR 270.41(a)(5) and 40 CFR 124.5 and comply with Permit Condition 1.2. *[40CFR 264.147(d)]*

14.10.4. Period of Coverage

Within 60 days after receiving certifications from the Permittee and a qualified Professional Engineer that final closure has been completed in accordance with the approved closure plan; the Director will notify the Permittee in writing that he is no longer required by this section to maintain liability coverage for the facility, unless the Director has reason to believe that closure has not been in accordance with the approved closure plan. *[40 CFR 264.147(e)]*

14.11 INCAPACITY OF OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

14.11.1. The Permittee must notify the Director by certified mail of the commencement of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming the Permittee or parent company as a debtor, within 10 days after commencement of the proceeding. *[40 CFR 264.148(a)]*

14.11.2. The Permittee will be deemed to be without the required financial assurance or liability coverage in the event of bankruptcy of the trustee or issuing institution, or a suspension or revocation of the authority of the institution issuing the surety bond or insurance policy. The Permittee shall establish other financial assurance or liability coverage within 60 days after such an event. *[40 CFR 264.148(b)]*

14.12 COMPLIANCE SCHEDULE

Reserved

RCRA Permit Renewal Application, Part A (a*ttached*)

OMB# 2050-0024; Expires 11/30/2011

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal

MARK ALL BOX(ES) THAT APPLY

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☐ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☒ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____)
- ☐ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of ≥1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number N V T 3 3 0 0 1 0 0 0 0

3. Site Name

Name: US Ecology Nevada

4. Site Location Information

Street Address: Highway 95, 11 miles south of Beatty

City, Town, or Village: Beatty | **County:** Nye

State: Nevada | **Country:** USA | **Zip Code:** 89003

5. Site Land Type

☐ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☒ State ☐ Other

6. NAICS Code(s) for the Site (at least 5-digit codes)

A. 5 6 2 2 1 1 | C. | B. | D.

7. Site Mailing Address

Street or P.O. Box: PO Box 578

City, Town, or Village: Beatty

State: Nevada | **Country:** USA | **Zip Code:** 89003

8. Site Contact Person

First Name: Robert | **MI:** L | **Last:** Marchand

Title: General Manager

Street or P.O. Box: PO Box 578

City, Town or Village: Beatty

State: Nevada | **Country:** USA | **Zip Code:** 89003

Email: bmarchand@usecology.com

Phone: (775) 553-2203 | **Ext.:** 104 | **Fax:**

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: Sate of Nevada | **Date Became Owner:** 01/01/1970

Owner Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☒ State ☐ Other

Street or P.O. Box: 901 S. Stewart Street

City, Town, or Village: Carson City | **Phone:** (775) 687-4670

State: Nevada | **Country:** USA | **Zip Code:** 89701

B. Name of Site's Operator: US Ecology Nevada | **Date Became Operator:** 01/01/1962

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

EPA ID Number N V T 3 3 0 0 1 0 0 0 0

OMB#: 2050-0024; Expires 11/30/2011

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

Y ☒ N ☐ **1. Generator of Hazardous Waste**
If "Yes", mark only one of the following – a, b, or c.

- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities.

Y ☐ N ☒ d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☒ N ☐ e. United States Importer of Hazardous Waste

Y ☐ N ☒ f. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☒ **2. Transporter of Hazardous Waste**
If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☒ N ☐ **3. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste permit is required for these activities.

Y ☐ N ☒ **4. Recycler of Hazardous Waste**

Y ☐ N ☒ **5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒ **6. Underground Injection Control**

Y ☒ N ☐ **7. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y ☐ N ☒ **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**

- a. Batteries ☐
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☐
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☒ N ☐ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☐ N ☒ **1. Used Oil Transporter**
If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☒ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.
- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒ **3. Off-Specification Used Oil Burner**

Y ☐ N ☒ **4. Used Oil Fuel Marketer**
If "Yes", mark all that apply.
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

OMB#: 2050-0024; Expires 11/30/2011

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories **See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:**

☐ a. College or University

☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

See attached						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

OMB#: 2050-0024; Expires 11/30/2011

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

USEN accepts state regulated wastes for treatment, storage and disposal. State regulated wastes are managed per ~~NAC 444 and NRS 459.~~

14. Certification. 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 fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
RL Marchand	Robert L. Marchand (General Manager)	9/22/11

Number 11 A Waste Codes for Federally Regulated Hazardous Wastes

D001	F008	K031	K109	P010	P068	P188	U037	U090	U143	U194	U364
D002	F009	K032	K110	P011	P069	P189	U038	U091	U144	U196	U367
D003	F010	K033	K111	P012	P070	P190	U039	U092	U145	U197	U372
D004	F011	K034	K112	P013	P071	P191	U041	U093	U146	U200	U373
D005	F012	K035	K113	P014	P072	P192	U042	U094	U147	U201	U387
D006	F019	K036	K114	P015	P073	P194	U043	U095	U148	U202	U389
D007	F020	K037	K115	P016	P074	P196	U044	U096	U149	U203	U394
D008	F021	K038	K116	P017	P075	P197	U045	U097	U150	U204	U395
D009	F022	K039	K117	P018	P076	P198	U046	U098	U151	U205	U404
D010	F023	K040	K118	P020	P077	P199	U047	U099	U152	U206	U409
D011	F024	K041	K123	P021	P078	P201	U048	U101	U153	U207	U410
D012	F025	K042	K124	P022	P081	P202	U049	U102	U154	U208	U411
D013	F026	K043	K125	P023	P082	P203	U050	U103	U155	U209	
D014	F027	K044	K126	P024	P084	P204	U051	U105	U156	U210	
D015	F028	K045	K131	P026	P085	P205	U052	U106	U157	U211	
D016	F032	K046	K132	P027	P087	U001	U053	U107	U158	U213	
D017	F034	K047	K136	P028	P088	U002	U055	U108	U159	U214	
D018	F035	K048	K141	P029	P089	U003	U056	U109	U160	U215	
D019	F037	K049	K142	P030	P092	U004	U057	U110	U161	U216	
D020	F038	K050	K143	P031	P093	U005	U058	U111	U162	U217	
D021	F039	K051	K144	P033	P094	U006	U059	U112	U163	U218	
D022	K001	K052	K145	P034	P095	U007	U060	U113	U164	U219	
D023	K002	K060	K147	P036	P096	U008	U061	U114	U165	U220	
D024	K003	K061	K148	P037	P097	U009	U062	U115	U166	U221	
D025	K004	K062	K149	P038	P098	U010	U063	U116	U167	U222	
D026	K005	K069	K150	P039	P099	U011	U064	U117	U168	U223	
D027	K006	K071	K151	P040	P101	U012	U066	U118	U169	U225	
D028	K007	K073	K156	P041	P102	U014	U067	U119	U170	U226	
D029	K008	K083	K157	P042	P103	U015	U068	U120	U171	U227	
D030	K009	K084	K158	P043	P104	U016	U069	U121	U172	U228	
D031	K010	K085	K159	P044	P105	U017	U070	U122	U173	U234	
D032	K011	K086	K161	P045	P106	U018	U071	U123	U174	U235	
D033	K013	K087	K169	P046	P108	U019	U072	U124	U176	U236	
D034	K014	K088	K170	P047	P109	U020	U073	U125	U177	U237	
D035	K015	K093	K171	P048	P110	U021	U074	U126	U178	U238	
D036	K016	K094	K172	P049	P111	U022	U075	U127	U179	U239	
D037	K017	K095	K174	P050	P112	U023	U076	U128	U180	U240	
D038	K018	K096	K175	P051	P113	U024	U077	U129	U181	U243	
D039	K019	K097	K176	P054	P114	U025	U078	U130	U182	U244	
D040	K020	K098	K177	P056	P115	U026	U079	U131	U183	U246	
D041	K021	K099	K178	P057	P116	U027	U080	U132	U184	U247	
D042	K022	K100	P001	P058	P118	U028	U081	U133	U185	U248	
D043	K023	K101	P002	P059	P119	U029	U082	U134	U186	U249	
F001	K024	K102	P003	P060	P120	U030	U083	U135	U187	U271	
F002	K025	K103	P004	P062	P121	U031	U084	U136	U188	U278	
F003	K026	K104	P005	P063	P122	U032	U085	U137	U189	U279	
F004	K027	K105	P006	P064	P123	U033	U086	U138	U190	U280	
F005	K028	K106	P007	P065	P127	U034	U087	U140	U191	U328	
F006	K029	K107	P008	P066	P128	U035	U088	U141	U192	U353	
F007	K030	K108	P009	P067	P185	U036	U089	U142	U193	U359	

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United States Environmental Protection Agency

HARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	**First Name:** Robert	**MI:** L	**Last Name:** Marchand
	Contact Title: General Manager		
	Phone: (775) 553-2203	**Ext.:** 104	**Email:** bmarchand@usecology.com
2. Facility Permit Contact Mailing Address	**Street or P.O. Box:** PO Box 578		
	City, Town, or Village: Beatty		
	State: Nevada		
	Country: USA	**Zip Code:** 89003	
3. Operator Mailing Address and Telephone Number	**Street or P.O. Box:** PO Box 578		
	City, Town, or Village: Beatty		
	State: Nevada	**Phone:** (775) 553-2203	
	Country: USA	**Zip Code:** 898003	
4. Facility Existence Date	**Facility Existence Date (mm/dd/yyyy):** 01/01/1970		

5. Other Environmental Permits

A. Facility Type (Enter code)	B. Permit Number	C. Description
R	NEVHW0019	NDEP-HAZARDOUS WASTE PERMIT
P	AP4953-0184 02	NDEP-STATE AIR PERMIT
E	NO PERMIT	EPA REGION IX - TSCA PERMIT
E	P33 0-08-00261	DEPT OF AGRICULTURE - SOIL PERMIT
E	ISW-1397	NDEP - STORM WATER PERMIT

6. Nature of Business:

The facility provides treatment, storage and disposal for RCRA, non-hazardous, and TSCA regulated wastes. Treatment options include, stabilization, neutralization, solidification, chemical oxidation, encapsulation and deactivation.

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
2. **UNIT OF MEASURE – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.**

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
	Disposal	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment	
T01	Tank Treatment	Gallons Per Day; Liters Per Day
T02	Surface Impoundment	Gallons Per Day; Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity (for T81 – T94)
	Treatment (Continued)	
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
	Miscellaneous (Subpart X)	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; or Million BTU Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

Unit of Measure	Unit of Measure Code
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Short Tons Per Day	N
Metric Tons Per Hour	W
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	X
Million BTU Per Hour	X
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
BTU Per Hour	I

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7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	6,593	Y	05	
	2	S	0	2	38,000	G	06	
	3	T	0	1	10,000	U	01	
	4	T	0	1	686,000	U	05	
	5	D	8	0	4,020,000	Y	02	
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	2	T	0	4	100.00	U	001	

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

A. EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
	1	D	0	0	1	1,000	T	S	0	1	T	0	1	D	8	0	
	2	D	0	0	2	10,000	T	S	0	1	T	0	1	D	8	0	
	3	D	0	0	3	10	T	S	0	1	T	0	1	D	8	0	
	4	D	0	0	4	20,000	T	S	0	1	T	0	1	D	8	0	
	5	D	0	0	5	20,000	T	S	0	1	T	0	1	D	8	0	
	6	D	0	0	6	10,000	T	S	0	1	T	0	1	D	8	0	
	7	D	0	0	7	25,000	T	S	0	1	T	0	1	D	8	0	
	8	D	0	0	8	25,000	T	S	0	1	T	0	1	D	8	0	
	9	D	0	0	9	200	T	S	0	1	T	0	1	D	8	0	
1	0	D	0	1	0	100	T	S	0	1	T	0	1	D	8	0	
1	1	D	0	1	1	100	T	S	0	1	T	0	1	D	8	0	
1	2	D	0	1	2	1	T	S	0	1	T	0	1	D	8	0	
1	3	D	0	1	3	1	T	S	0	1	T	0	1	D	8	0	
1	4	D	0	1	4	1	T	S	0	1	T	0	1	D	8	0	
1	5	D	0	1	5	1	T	S	0	1	T	0	1	D	8	0	
1	6	D	0	1	6	1	T	S	0	1	T	0	1	D	8	0	
1	7	D	0	1	7	1	T	S	0	1	T	0	1	D	8	0	
1	8	D	0	1	8	100	T	S	0	1	T	0	1	D	8	0	
1	9	D	0	1	9	25	T	S	0	1	T	0	1	D	8	0	
2	0	D	0	2	0	1	T	S	0	1	T	0	1	D	8	0	
2	1	D	0	2	1	5	T	S	0	1	T	0	1	D	8	0	
2	2	D	0	2	2	5	T	S	0	1	T	0	1	D	8	0	
2	3	D	0	2	3	1	T	S	0	1	T	0	1	D	8	0	
2	4	D	0	2	4	1	T	S	0	1	T	0	1	D	8	0	
2	5	D	0	2	5	1	T	S	0	1	T	0	1	D	8	0	
2	6	D	0	2	6	1	T	S	0	1	T	0	1	D	8	0	
2	7	D	0	2	7	2	T	S	0	1	T	0	1	D	8	0	
2	8	D	0	2	8	10	T	S	0	1	T	0	1	D	8	0	
2	9	D	0	2	9	10	T	S	0	1	T	0	1	D	8	0	
3	0	D	0	3	0	1	T	S	0	1	T	0	1	D	8	0	
3	1	D	0	3	1	1	T	S	0	1	T	0	1	D	8	0	
3	2	D	0	3	2	1	T	S	0	1	T	0	1	D	8	0	
3	3	D	0	3	3	1	T	S	0	1	T	0	1	D	8	0	
3	4	D	0	3	4	1	T	S	0	1	T	0	1	D	8	0	
3	5	D	0	3	5	5	T	S	0	1	T	0	1	D	8	0	
3	6	D	0	3	6	1	T	S	0	1	T	0	1	D	8	0	

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
3	7	D	0	3	7	1	T	S	0	1	T	0	1	D	8	0	
3	8	D	0	3	8	1	T	S	0	1	T	0	1	D	8	0	
3	9	D	0	3	9	10	T	S	0	1	T	0	1	D	8	0	
4	0	D	0	4	0	10	T	S	0	1	T	0	1	D	8	0	
4	1	D	0	4	1	1	T	S	0	1	T	0	1	D	8	0	
4	2	D	0	4	2	1	T	S	0	1	T	0	1	D	8	0	
4	3	D	0	4	3	2	T	S	0	1	T	0	1	D	8	0	
4	4	F	0	0	1	5	T	S	0	1	T	0	1	D	8	0	
4	5	F	0	0	2	50	T	S	0	1	T	0	1	D	8	0	
4	6	F	0	0	3	5	T	S	0	1	T	0	1	D	8	0	
4	7	F	0	0	4	1	T	S	0	1	T	0	1	D	8	0	
4	8	F	0	0	5	1	T	S	0	1	T	0	1	D	8	0	
4	9	F	0	0	6	10,000	T	S	0	1	T	0	1	D	8	0	
5	0	F	0	0	7	5,000	T	S	0	1	T	0	1	D	8	0	
5	1	F	0	0	8	1,000	T	S	0	1	T	0	1	D	8	0	
5	2	F	0	0	9	500	T	S	0	1	T	0	1	D	8	0	
5	3	F	0	1	0	500	T	S	0	1	T	0	1	D	8	0	
5	4	F	0	1	1	100	T	S	0	1	T	0	1	D	8	0	
5	5	F	0	1	2	100	T	S	0	1	T	0	1	D	8	0	
5	6	F	0	1	9	1,000	T	S	0	1	T	0	1	D	8	0	
5	7	F	0	2	0	0.1	T	S	0	1	T	0	1	D	8	0	
5	8	F	0	2	1	0.1	T	S	0	1	T	0	1	D	8	0	
5	9	F	0	2	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	0	F	0	2	3	0.1	T	S	0	1	T	0	1	D	8	0	
6	1	F	0	2	4	0.1	T	S	0	1	T	0	1	D	8	0	
6	2	F	0	2	5	0.1	T	S	0	1	T	0	1	D	8	0	
6	3	F	0	2	6	0.1	T	S	0	1	T	0	1	D	8	0	
6	4	F	0	2	7	0.1	T	S	0	1	T	0	1	D	8	0	
6	5	F	0	2	8	0.1	T	S	0	1	T	0	1	D	8	0	
6	6	F	0	3	2	1	T	S	0	1	T	0	1	D	8	0	
6	7	F	0	3	4	0.5	T	S	0	1	T	0	1	D	8	0	
6	8	F	0	3	5	5	T	S	0	1	T	0	1	D	8	0	
6	9	F	0	3	7	500	T	S	0	1	T	0	1	D	8	0	
7	0	F	0	3	9	500	T	S	0	1	T	0	1	D	8	0	
7	1	K	0	0	1	1	T	S	0	1	T	0	1	D	8	0	
7	2	K	0	0	2	1	T	S	0	1	T	0	1	D	8	0	

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
7	3	K	0	0	3	1	T	S	0	1	T	0	1	D	8	0	
7	4	K	0	0	4	1	T	S	0	1	T	0	1	D	8	0	
7	5	K	0	0	5	1	T	S	0	1	T	0	1	D	8	0	
7	6	K	0	0	6	1	T	S	0	1	T	0	1	D	8	0	
7	7	K	0	0	7	1	T	S	0	1	T	0	1	D	8	0	
7	8	K	0	0	8	1	T	S	0	1	T	0	1	D	8	0	
7	9	K	0	0	9	1	T	S	0	1	T	0	1	D	8	0	
8	0	K	0	1	0	1	T	S	0	1	T	0	1	D	8	0	
8	1	K	0	1	1	1	T	S	0	1	T	0	1	D	8	0	
8	2	K	0	1	3	1	T	S	0	1	T	0	1	D	8	0	
8	3	K	0	1	4	1	T	S	0	1	T	0	1	D	8	0	
8	4	K	0	1	5	1	T	S	0	1	T	0	1	D	8	0	
8	5	K	0	1	6	1	T	S	0	1	T	0	1	D	8	0	
8	6	K	0	1	7	1	T	S	0	1	T	0	1	D	8	0	
8	7	K	0	1	8	1	T	S	0	1	T	0	1	D	8	0	
8	8	K	0	1	9	1	T	S	0	1	T	0	1	D	8	0	
8	9	K	0	2	0	1	T	S	0	1	T	0	1	D	8	0	
9	0	K	0	2	1	1	T	S	0	1	T	0	1	D	8	0	
9	1	K	0	2	2	1	T	S	0	1	T	0	1	D	8	0	
9	2	K	0	2	3	1	T	S	0	1	T	0	1	D	8	0	
9	3	K	0	2	4	1	T	S	0	1	T	0	1	D	8	0	
9	4	K	0	2	5	0.1	T	S	0	1	T	0	1	D	8	0	
9	5	K	0	2	6	0.1	T	S	0	1	T	0	1	D	8	0	
9	6	K	0	2	7	0.1	T	S	0	1	T	0	1	D	8	0	
9	7	K	0	2	8	1	T	S	0	1	T	0	1	D	8	0	
9	8	K	0	2	9	1	T	S	0	1	T	0	1	D	8	0	
9	9	K	0	3	0	0.1	T	S	0	1	T	0	1	D	8	0	
0	0	K	0	3	1	0.1	T	S	0	1	T	0	1	D	8	0	
0	1	K	0	3	2	0.1	T	S	0	1	T	0	1	D	8	0	
0	2	K	0	3	3	0.1	T	S	0	1	T	0	1	D	8	0	
0	3	K	0	3	4	0.1	T	S	0	1	T	0	1	D	8	0	
0	4	K	0	3	5	1	T	S	0	1	T	0	1	D	8	0	
0	5	K	0	3	6	0.1	T	S	0	1	T	0	1	D	8	0	
0	6	K	0	3	7	0.1	T	S	0	1	T	0	1	D	8	0	
0	7	K	0	3	8	0.1	T	S	0	1	T	0	1	D	8	0	
0	8	K	0	3	9	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number N V T 3 3 0 0 1 0 0 0 0

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
09	K040	0.1	T	S01 T01 D80	
10	K041	0.1	T	S01 T01 D80	
11	K042	0.1	T	S01 T01 D80	
12	K043	0.1	T	S01 T01 D80	
13	K044	0.1	T	S01 T01 D80	
14	K045	0.1	T	S01 T01 D80	
15	K046	0.1	T	S01 T01 D80	
16	K047	0.1	T	S01 T01 D80	
17	K048	0.1	T	S01 T01 D80	
18	K049	1	T	S01 T01 D80	
19	K050	100	T	S01 T01 D80	
20	K051	100	T	S01 T01 D80	
21	K052	100	T	S01 T01 D80	
22	K060	1	T	S01 T01 D80	
23	K061	250	T	S01 T01 D80	
24	K062	200	T	S01 T01 D80	
25	K069	250	T	S01 T01 D80	
26	K071	0.1	T	S01 T01 D80	
27	K073	0.1	T	S01 T01 D80	
28	K083	0.1	T	S01 T01 D80	
29	K084	0.1	T	S01 T01 D80	
30	K085	0.1	T	S01 T01 D80	
31	K086	0.1	T	S01 T01 D80	
32	K087	0.1	T	S01 T01 D80	
33	K088	0.1	T	S01 T01 D80	
34	K093	0.1	T	S01 T01 D80	
35	K094	0.1	T	S01 T01 D80	
36	K095	0.1	T	S01 T01 D80	
37	K096	0.1	T	S01 T01 D80	
38	K097	0.1	T	S01 T01 D80	
39	K098	0.1	T	S01 T01 D80	
40	K099	0.1	T	S01 T01 D80	
41	K100	0.1	T	S01 T01 D80	
42	K101	0.1	T	S01 T01 D80	
43	K102	0.1	T	S01 T01 D80	
44	K103	0.1	T	S01 T01 D80	

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
4	5	K	1	0	4	0.1	T	S	0	1	T	0	1	D	8	0	
4	6	K	1	0	5	0.1	T	S	0	1	T	0	1	D	8	0	
4	7	K	1	0	6	0.1	T	S	0	1	T	0	1	D	8	0	
4	8	K	1	0	7	0.1	T	S	0	1	T	0	1	D	8	0	
4	9	K	1	0	8	0.1	T	S	0	1	T	0	1	D	8	0	
5	0	K	1	0	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	1	K	1	1	0	0.1	T	S	0	1	T	0	1	D	8	0	
5	2	K	1	1	1	0.1	T	S	0	1	T	0	1	D	8	0	
5	3	K	1	1	2	0.1	T	S	0	1	T	0	1	D	8	0	
5	4	K	1	1	3	0.1	T	S	0	1	T	0	1	D	8	0	
5	5	K	1	1	4	0.1	T	S	0	1	T	0	1	D	8	0	
5	6	K	1	1	5	0.1	T	S	0	1	T	0	1	D	8	0	
5	7	K	1	1	6	0.1	T	S	0	1	T	0	1	D	8	0	
5	8	K	1	1	7	0.1	T	S	0	1	T	0	1	D	8	0	
5	9	K	1	1	8	0.1	T	S	0	1	T	0	1	D	8	0	
6	0	K	1	2	3	0.1	T	S	0	1	T	0	1	D	8	0	
6	1	K	1	2	4	0.1	T	S	0	1	T	0	1	D	8	0	
6	2	K	1	2	5	0.1	T	S	0	1	T	0	1	D	8	0	
6	3	K	1	2	6	0.1	T	S	0	1	T	0	1	D	8	0	
6	4	K	1	3	1	0.1	T	S	0	1	T	0	1	D	8	0	
6	5	K	1	3	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	6	K	1	3	6	0.1	T	S	0	1	T	0	1	D	8	0	
6	7	K	1	4	1	0.1	T	S	0	1	T	0	1	D	8	0	
6	8	K	1	4	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	9	K	1	4	3	0.1	T	S	0	1	T	0	1	D	8	0	
7	0	K	1	4	4	0.1	T	S	0	1	T	0	1	D	8	0	
7	1	K	1	4	5	0.1	T	S	0	1	T	0	1	D	8	0	
7	2	K	1	4	7	0.1	T	S	0	1	T	0	1	D	8	0	
7	3	K	1	4	8	0.1	T	S	0	1	T	0	1	D	8	0	
7	4	K	1	4	9	0.1	T	S	0	1	T	0	1	D	8	0	
7	5	K	1	5	1	0.1	T	S	0	1	T	0	1	D	8	0	
7	6	K	1	5	6	0.1	T	S	0	1	T	0	1	D	8	0	
7	7	K	1	5	7	0.1	T	S	0	1	T	0	1	D	8	0	
7	8	K	1	5	8	0.1	T	S	0	1	T	0	1	D	8	0	
7	9	K	1	5	9	0.1	T	S	0	1	T	0	1	D	8	0	
8	0	K	1	6	1	0.1	T	S	0	1	T	0	1	D	8	0	

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
8	1	K	1	6	9	500	T	S	0	1	T	0	1	D	8	0	
8	2	K	1	7	0	500	T	S	0	1	T	0	1	D	8	0	
8	3	K	1	7	1	500	T	S	0	1	T	0	1	D	8	0	
8	4	K	1	7	2	1000	T	S	0	1	T	0	1	D	8	0	
8	5	K	1	7	4	0.1	T	S	0	1	T	0	1	D	8	0	
8	6	K	1	7	5	0.1	T	S	0	1	T	0	1	D	8	0	
8	7	K	1	7	6	0.1	T	S	0	1	T	0	1	D	8	0	
8	8	K	1	7	7	0.1	T	S	0	1	T	0	1	D	8	0	
8	9	K	1	7	8	0.1	T	S	0	1	T	0	1	D	8	0	
9	0	K	1	8	1	0.1	T	S	0	1	T	0	1	D	8	0	
9	1	P	0	0	1	0.1	T	S	0	1	T	0	1	D	8	0	
9	2	P	0	0	2	0.1	T	S	0	1	T	0	1	D	8	0	
9	3	P	0	0	3	0.1	T	S	0	1	T	0	1	D	8	0	
9	4	P	0	0	4	0.1	T	S	0	1	T	0	1	D	8	0	
9	5	P	0	0	5	0.1	T	S	0	1	T	0	1	D	8	0	
9	6	P	0	0	6	0.1	T	S	0	1	T	0	1	D	8	0	
9	7	P	0	0	7	0.1	T	S	0	1	T	0	1	D	8	0	
9	8	P	0	0	8	0.1	T	S	0	1	T	0	1	D	8	0	
9	9	P	0	0	9	0.1	T	S	0	1	T	0	1	D	8	0	
2 0	0	P	0	1	0	1	T	S	0	1	T	0	1	D	8	0	
0	1	P	0	1	1	1	T	S	0	1	T	0	1	D	8	0	
0	2	P	0	1	2	1	T	S	0	1	T	0	1	D	8	0	
0	3	P	0	1	3	0.5	T	S	0	1	T	0	1	D	8	0	
0	4	P	0	1	4	0.1	T	S	0	1	T	0	1	D	8	0	
0	5	P	0	1	5	0.1	T	S	0	1	T	0	1	D	8	0	
0	6	P	0	1	6	0.1	T	S	0	1	T	0	1	D	8	0	
0	7	P	0	1	7	0.1	T	S	0	1	T	0	1	D	8	0	
0	8	P	0	1	8	0.1	T	S	0	1	T	0	1	D	8	0	
0	9	P	0	2	0	0.1	T	S	0	1	T	0	1	D	8	0	
1	0	P	0	2	1	0.1	T	S	0	1	T	0	1	D	8	0	
1	1	P	0	2	2	0.1	T	S	0	1	T	0	1	D	8	0	
1	2	P	0	2	3	0.1	T	S	0	1	T	0	1	D	8	0	
1	3	P	0	2	4	0.1	T	S	0	1	T	0	1	D	8	0	
1	4	P	0	2	6	0.1	T	S	0	1	T	0	1	D	8	0	
1	5	P	0	2	7	0.1	T	S	0	1	T	0	1	D	8	0	
1	6	P	0	2	8	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
1	7	P	0	2	9	1	T	S	0	1	T	0	1	D	8	0	
1	8	P	0	3	0	25	T	S	0	1	T	0	1	D	8	0	
1	9	P	0	3	1	0.1	T	S	0	1	T	0	1	D	8	0	
2	0	P	0	3	3	0.1	T	S	0	1	T	0	1	D	8	0	
2	1	P	0	3	4	0.1	T	S	0	1	T	0	1	D	8	0	
2	2	P	0	3	6	0.1	T	S	0	1	T	0	1	D	8	0	
2	3	P	0	3	7	0.1	T	S	0	1	T	0	1	D	8	0	
2	4	P	0	3	8	0.1	T	S	0	1	T	0	1	D	8	0	
2	5	P	0	3	9	0.1	T	S	0	1	T	0	1	D	8	0	
2	6	P	0	4	0	0.1	T	S	0	1	T	0	1	D	8	0	
2	7	P	0	4	1	0.1	T	S	0	1	T	0	1	D	8	0	
2	8	P	0	4	2	0.1	T	S	0	1	T	0	1	D	8	0	
2	9	P	0	4	3	0.1	T	S	0	1	T	0	1	D	8	0	
3	0	P	0	4	4	0.1	T	S	0	1	T	0	1	D	8	0	
3	1	P	0	4	5	0.1	T	S	0	1	T	0	1	D	8	0	
3	2	P	0	4	6	0.1	T	S	0	1	T	0	1	D	8	0	
3	3	P	0	4	7	0.1	T	S	0	1	T	0	1	D	8	0	
3	4	P	0	4	8	0.1	T	S	0	1	T	0	1	D	8	0	
3	5	P	0	5	0	0.1	T	S	0	1	T	0	1	D	8	0	
3	6	P	0	5	1	1	T	S	0	1	T	0	1	D	8	0	
3	7	P	0	5	4	0.1	T	S	0	1	T	0	1	D	8	0	
3	8	P	0	5	6	0.1	T	S	0	1	T	0	1	D	8	0	
3	9	P	0	5	7	0.1	T	S	0	1	T	0	1	D	8	0	
4	0	P	0	5	8	0.1	T	S	0	1	T	0	1	D	8	0	
4	1	P	0	5	9	0.1	T	S	0	1	T	0	1	D	8	0	
4	2	P	0	6	0	0.1	T	S	0	1	T	0	1	D	8	0	
4	3	P	0	6	2	0.1	T	S	0	1	T	0	1	D	8	0	
4	4	P	0	6	3	0.1	T	S	0	1	T	0	1	D	8	0	
4	5	P	0	6	4	0.1	T	S	0	1	T	0	1	D	8	0	
4	6	P	0	6	5	0.1	T	S	0	1	T	0	1	D	8	0	
4	7	P	0	6	6	0.1	T	S	0	1	T	0	1	D	8	0	
4	8	P	0	6	7	0.1	T	S	0	1	T	0	1	D	8	0	
4	9	P	0	6	8	0.1	T	S	0	1	T	0	1	D	8	0	
5	0	P	0	6	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	1	P	0	7	0	0.1	T	S	0	1	T	0	1	D	8	0	
5	2	P	0	7	1	0.1	T	S	0	1	T	0	1	D	8	0	

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
5	3	P	0	7	2	0.1	T	S	0	1	T	0	1	D	8	0	
5	4	P	0	7	3	0.1	T	S	0	1	T	0	1	D	8	0	
5	5	P	0	7	4	0.1	T	S	0	1	T	0	1	D	8	0	
5	6	P	0	7	5	0.1	T	S	0	1	T	0	1	D	8	0	
5	7	P	0	7	6	0.1	T	S	0	1	T	0	1	D	8	0	
5	8	P	0	7	7	0.1	T	S	0	1	T	0	1	D	8	0	
5	9	P	0	7	8	0.1	T	S	0	1	T	0	1	D	8	0	
6	0	P	0	8	1	0.1	T	S	0	1	T	0	1	D	8	0	
6	1	P	0	8	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	2	P	0	8	5	0.1	T	S	0	1	T	0	1	D	8	0	
6	3	P	0	8	7	0.1	T	S	0	1	T	0	1	D	8	0	
6	4	P	0	8	8	0.1	T	S	0	1	T	0	1	D	8	0	
6	5	P	0	8	9	0.1	T	S	0	1	T	0	1	D	8	0	
6	6	P	0	9	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	7	P	0	9	3	0.1	T	S	0	1	T	0	1	D	8	0	
6	8	P	0	9	4	0.1	T	S	0	1	T	0	1	D	8	0	
6	9	P	0	9	5	0.1	T	S	0	1	T	0	1	D	8	0	
7	0	P	0	9	6	0.1	T	S	0	1	T	0	1	D	8	0	
7	1	P	0	9	7	0.1	T	S	0	1	T	0	1	D	8	0	
7	2	P	0	9	8	1	T	S	0	1	T	0	1	D	8	0	
7	3	P	0	9	9	0.1	T	S	0	1	T	0	1	D	8	0	
7	4	P	1	0	1	0.1	T	S	0	1	T	0	1	D	8	0	
7	5	P	1	0	2	0.1	T	S	0	1	T	0	1	D	8	0	
7	6	P	1	0	3	0.1	T	S	0	1	T	0	1	D	8	0	
7	7	P	1	0	4	0.5	T	S	0	1	T	0	1	D	8	0	
7	8	P	1	0	6	5	T	S	0	1	T	0	1	D	8	0	
7	9	P	1	0	8	0.1	T	S	0	1	T	0	1	D	8	0	
8	0	P	1	0	9	0.1	T	S	0	1	T	0	1	D	8	0	
8	1	P	1	1	0	0.1	T	S	0	1	T	0	1	D	8	0	
8	2	P	1	1	1	0.1	T	S	0	1	T	0	1	D	8	0	
8	3	P	1	1	2	0.1	T	S	0	1	T	0	1	D	8	0	
8	4	P	1	1	3	0.1	T	S	0	1	T	0	1	D	8	0	
8	5	P	1	1	4	0.1	T	S	0	1	T	0	1	D	8	0	
8	6	P	1	1	5	0.1	T	S	0	1	T	0	1	D	8	0	
8	7	P	1	1	6	0.1	T	S	0	1	T	0	1	D	8	0	
8	8	P	1	1	8	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
8	9	P	1	1	9	0.5	T	S	0	1	T	0	1	D	8	0	
9	0	P	1	2	0	0.5	T	S	0	1	T	0	1	D	8	0	
9	1	P	1	2	1	0.5	T	S	0	1	T	0	1	D	8	0	
9	2	P	1	2	2	0.1	T	S	0	1	T	0	1	D	8	0	
9	3	P	1	2	3	0.1	T	S	0	1	T	0	1	D	8	0	
9	4	P	1	2	7	0.1	T	S	0	1	T	0	1	D	8	0	
9	5	P	1	2	8	0.1	T	S	0	1	T	0	1	D	8	0	
9	6	P	1	8	5	0.1	T	S	0	1	T	0	1	D	8	0	
9	7	P	1	8	8	0.1	T	S	0	1	T	0	1	D	8	0	
9	8	P	1	8	9	0.1	T	S	0	1	T	0	1	D	8	0	
9	9	P	1	9	0	0.1	T	S	0	1	T	0	1	D	8	0	
3 0	0	P	1	9	1	0.1	T	S	0	1	T	0	1	D	8	0	
0	1	P	1	9	2	0.1	T	S	0	1	T	0	1	D	8	0	
0	2	P	1	9	4	0.1	T	S	0	1	T	0	1	D	8	0	
0	3	P	1	9	6	0.1	T	S	0	1	T	0	1	D	8	0	
0	4	P	1	9	7	0.1	T	S	0	1	T	0	1	D	8	0	
0	5	P	1	9	8	0.1	T	S	0	1	T	0	1	D	8	0	
0	6	P	1	9	9	0.1	T	S	0	1	T	0	1	D	8	0	
0	7	P	2	0	1	0.1	T	S	0	1	T	0	1	D	8	0	
0	8	P	2	0	2	1	T	S	0	1	T	0	1	D	8	0	
0	9	P	2	0	3	0.1	T	S	0	1	T	0	1	D	8	0	
1	0	P	2	0	4	0.1	T	S	0	1	T	0	1	D	8	0	
1	1	P	2	0	5	0.1	T	S	0	1	T	0	1	D	8	0	
1	2	U	0	0	1	0.1	T	S	0	1	T	0	1	D	8	0	
1	3	0	0	0	2	0.5	T	S	0	1	T	0	1	D	8	0	
1	4	U	0	0	3	0.1	T	S	0	1	T	0	1	D	8	0	
1	5	U	0	0	4	0.1	T	S	0	1	T	0	1	D	8	0	
1	6	U	0	0	5	0.1	T	S	0	1	T	0	1	D	8	0	
1	7	U	0	0	6	0.1	T	S	0	1	T	0	1	D	8	0	
1	8	U	0	0	7	0.1	T	S	0	1	T	0	1	D	8	0	
1	9	U	0	0	8	0.1	T	S	0	1	T	0	1	D	8	0	
2	0	U	0	0	9	0.1	T	S	0	1	T	0	1	D	8	0	
2	1	U	0	1	0	0.1	T	S	0	1	T	0	1	D	8	0	
2	2	U	0	1	1	0.1	T	S	0	1	T	0	1	D	8	0	
2	3	U	0	1	2	0.1	T	S	0	1	T	0	1	D	8	0	
2	4	U	0	1	4	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
2	5	U	0	1	5	0.1	T	S	0	1	T	0	1	D	8	0	
2	6	U	0	1	6	0.1	T	S	0	1	T	0	1	D	8	0	
2	7	U	0	1	7	0.1	T	S	0	1	T	0	1	D	8	0	
2	8	U	0	1	8	0.1	T	S	0	1	T	0	1	D	8	0	
2	9	U	0	1	9	0.1	T	S	0	1	T	0	1	D	8	0	
3	0	U	0	2	0	0.1	T	S	0	1	T	0	1	D	8	0	
3	1	U	0	2	1	0.1	T	S	0	1	T	0	1	D	8	0	
3	2	U	0	2	2	0.1	T	S	0	1	T	0	1	D	8	0	
3	3	U	0	2	3	0.1	T	S	0	1	T	0	1	D	8	0	
3	4	U	0	2	4	0.1	T	S	0	1	T	0	1	D	8	0	
3	5	U	0	2	5	0.1	T	S	0	1	T	0	1	D	8	0	
3	6	U	0	2	6	0.1	T	S	0	1	T	0	1	D	8	0	
3	7	U	0	2	7	0.1	T	S	0	1	T	0	1	D	8	0	
3	8	U	0	2	8	0.1	T	S	0	1	T	0	1	D	8	0	
3	9	U	0	2	9	0.1	T	S	0	1	T	0	1	D	8	0	
4	0	U	0	3	0	0.1	T	S	0	1	T	0	1	D	8	0	
4	1	U	0	3	1	0.1	T	S	0	1	T	0	1	D	8	0	
4	2	U	0	3	2	0.1	T	S	0	1	T	0	1	D	8	0	
4	3	U	0	3	3	0.1	T	S	0	1	T	0	1	D	8	0	
4	4	U	0	3	4	0.1	T	S	0	1	T	0	1	D	8	0	
4	5	U	0	3	5	0.1	T	S	0	1	T	0	1	D	8	0	
4	6	U	0	3	6	0.5	T	S	0	1	T	0	1	D	8	0	
4	7	U	0	3	7	0.5	T	S	0	1	T	0	1	D	8	0	
4	8	U	0	3	8	0.1	T	S	0	1	T	0	1	D	8	0	
4	9	U	0	3	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	0	U	0	4	1	0.1	T	S	0	1	T	0	1	D	8	0	
5	1	U	0	4	2	0.1	T	S	0	1	T	0	1	D	8	0	
5	2	U	0	4	3	0.5	T	S	0	1	T	0	1	D	8	0	
5	3	U	0	4	4	0.5	T	S	0	1	T	0	1	D	8	0	
5	4	U	0	4	5	0.1	T	S	0	1	T	0	1	D	8	0	
5	5	U	0	4	6	0.1	T	S	0	1	T	0	1	D	8	0	
5	6	U	0	4	7	0.1	T	S	0	1	T	0	1	D	8	0	
5	7	U	0	4	8	0.1	T	S	0	1	T	0	1	D	8	0	
5	8	U	0	4	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	9	U	0	5	0	0.1	T	S	0	1	T	0	1	D	8	0	
6	0	U	0	5	1	0.5	T	S	0	1	T	0	1	D	8	0	

EPA ID Number N V T 3 3 0 0 1 0 0 0 0

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9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
6	1	U	0	5	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	2	U	0	5	3	0.1	T	S	0	1	T	0	1	D	8	0	
6	3	U	0	5	5	0.1	T	S	0	1	T	0	1	D	8	0	
6	4	U	0	5	6	0.1	T	S	0	1	T	0	1	D	8	0	
6	5	U	0	5	7	0.1	T	S	0	1	T	0	1	D	8	0	
6	6	U	0	5	8	0.1	T	S	0	1	T	0	1	D	8	0	
6	7	U	0	5	9	0.1	T	S	0	1	T	0	1	D	8	0	
6	8	U	0	6	0	5	T	S	0	1	T	0	1	D	8	0	
6	9	U	0	6	1	5	T	S	0	1	T	0	1	D	8	0	
7	0	U	0	6	2	0.1	T	S	0	1	T	0	1	D	8	0	
7	1	U	0	6	3	0.1	T	S	0	1	T	0	1	D	8	0	
7	2	U	0	6	4	0.1	T	S	0	1	T	0	1	D	8	0	
7	3	U	0	6	6	0.1	T	S	0	1	T	0	1	D	8	0	
7	4	U	0	6	7	0.1	T	S	0	1	T	0	1	D	8	0	
7	5	U	0	6	8	0.1	T	S	0	1	T	0	1	D	8	0	
7	6	U	0	6	9	0.1	T	S	0	1	T	0	1	D	8	0	
7	7	U	0	7	0	0.1	T	S	0	1	T	0	1	D	8	0	
7	8	U	0	7	1	0.1	T	S	0	1	T	0	1	D	8	0	
7	9	U	0	7	2	0.1	T	S	0	1	T	0	1	D	8	0	
8	0	U	0	7	3	0.1	T	S	0	1	T	0	1	D	8	0	
8	1	U	0	7	4	0.1	T	S	0	1	T	0	1	D	8	0	
8	2	U	0	7	5	0.1	T	S	0	1	T	0	1	D	8	0	
8	3	U	0	7	6	0.5	T	S	0	1	T	0	1	D	8	0	
8	4	U	0	7	7	0.5	T	S	0	1	T	0	1	D	8	0	
8	5	U	0	7	8	0.5	T	S	0	1	T	0	1	D	8	0	
8	6	U	0	7	9	0.5	T	S	0	1	T	0	1	D	8	0	
8	7	U	0	8	0	0.5	T	S	0	1	T	0	1	D	8	0	
8	8	U	0	8	1	0.5	T	S	0	1	T	0	1	D	8	0	
8	9	U	0	8	2	0.5	T	S	0	1	T	0	1	D	8	0	
9	0	U	0	8	3	0.1	T	S	0	1	T	0	1	D	8	0	
9	1	U	0	8	4	0.1	T	S	0	1	T	0	1	D	8	0	
9	2	U	0	8	5	0.1	T	S	0	1	T	0	1	D	8	0	
9	3	U	0	8	6	0.1	T	S	0	1	T	0	1	D	8	0	
9	4	U	0	8	7	0.1	T	S	0	1	T	0	1	D	8	0	
9	5	U	0	8	8	0.1	T	S	0	1	T	0	1	D	8	0	
9	6	U	0	8	9	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
9	7	U	0	9	0	0.1	T	S	0	1	T	0	1	D	8	0	
9	8	U	0	9	1	0.1	T	S	0	1	T	0	1	D	8	0	
9	9	U	0	9	2	0.1	T	S	0	1	T	0	1	D	8	0	
4 0	0	U	0	9	3	0.1	T	S	0	1	T	0	1	D	8	0	
0	1	U	0	9	4	0.1	T	S	0	1	T	0	1	D	8	0	
0	2	U	0	9	5	0.1	T	S	0	1	T	0	1	D	8	0	
0	3	U	0	9	6	0.1	T	S	0	1	T	0	1	D	8	0	
0	4	U	0	9	7	0.1	T	S	0	1	T	0	1	D	8	0	
0	5	U	0	9	8	0.1	T	S	0	1	T	0	1	D	8	0	
0	6	U	0	9	9	0.1	T	S	0	1	T	0	1	D	8	0	
0	7	U	1	0	1	0.1	T	S	0	1	T	0	1	D	8	0	
0	8	U	1	0	2	0.1	T	S	0	1	T	0	1	D	8	0	
0	9	U	1	0	3	0.1	T	S	0	1	T	0	1	D	8	0	
1	0	U	1	0	5	0.1	T	S	0	1	T	0	1	D	8	0	
1	1	U	1	0	6	0.1	T	S	0	1	T	0	1	D	8	0	
1	2	U	1	0	7	0.1	T	S	0	1	T	0	1	D	8	0	
1	3	U	1	0	8	0.1	T	S	0	1	T	0	1	D	8	0	
1	4	U	1	0	9	0.1	T	S	0	1	T	0	1	D	8	0	
1	5	U	1	1	0	0.1	T	S	0	1	T	0	1	D	8	0	
1	6	U	1	1	1	0.1	T	S	0	1	T	0	1	D	8	0	
1	7	U	1	1	2	0.1	T	S	0	1	T	0	1	D	8	0	
1	8	U	1	1	3	0.1	T	S	0	1	T	0	1	D	8	0	
1	9	U	1	1	4	0.1	T	S	0	1	T	0	1	D	8	0	
2	0	U	1	1	5	0.1	T	S	0	1	T	0	1	D	8	0	
2	1	U	1	1	6	0.1	T	S	0	1	T	0	1	D	8	0	
2	2	U	1	1	7	0.1	T	S	0	1	T	0	1	D	8	0	
2	3	U	1	1	8	0.1	T	S	0	1	T	0	1	D	8	0	
2	4	U	1	1	9	0.1	T	S	0	1	T	0	1	D	8	0	
2	5	U	1	2	0	0.1	T	S	0	1	T	0	1	D	8	0	
2	6	U	1	2	1	0.1	T	S	0	1	T	0	1	D	8	0	
2	7	U	1	2	2	0.2	T	S	0	1	T	0	1	D	8	0	
2	8	U	1	2	3	0.5	T	S	0	1	T	0	1	D	8	0	
2	9	U	1	2	4	0.1	T	S	0	1	T	0	1	D	8	0	
3	0	U	1	2	5	0.1	T	S	0	1	T	0	1	D	8	0	
3	1	U	1	2	6	0.1	T	S	0	1	T	0	1	D	8	0	
3	2	U	1	2	7	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
3	3	U	1	2	8	0.1	T	S	0	1	T	0	1	D	8	0	
3	4	U	1	2	9	0.1	T	S	0	1	T	0	1	D	8	0	
3	5	U	1	3	0	0.1	T	S	0	1	T	0	1	D	8	0	
3	6	U	1	3	1	0.1	T	S	0	1	T	0	1	D	8	0	
3	7	U	1	3	2	0.1	T	S	0	1	T	0	1	D	8	0	
3	8	U	1	3	3	0.1	T	S	0	1	T	0	1	D	8	0	
3	9	U	1	3	4	1	T	S	0	1	T	0	1	D	8	0	
4	0	U	1	3	5	0.5	T	S	0	1	T	0	1	D	8	0	
4	1	U	1	3	6	0.1	T	S	0	1	T	0	1	D	8	0	
4	2	U	1	3	7	0.1	T	S	0	1	T	0	1	D	8	0	
4	3	U	1	3	8	0.1	T	S	0	1	T	0	1	D	8	0	
4	4	U	1	4	0	0.1	T	S	0	1	T	0	1	D	8	0	
4	5	U	1	4	1	0.1	T	S	0	1	T	0	1	D	8	0	
4	6	U	1	4	2	0.1	T	S	0	1	T	0	1	D	8	0	
4	7	U	1	4	3	0.1	T	S	0	1	T	0	1	D	8	0	
4	8	U	1	4	4	0.5	T	S	0	1	T	0	1	D	8	0	
4	9	U	1	4	5	0.2	T	S	0	1	T	0	1	D	8	0	
5	0	U	1	4	6	0.1	T	S	0	1	T	0	1	D	8	0	
5	1	U	1	4	7	0.1	T	S	0	1	T	0	1	D	8	0	
5	2	U	1	4	8	0.1	T	S	0	1	T	0	1	D	8	0	
5	3	U	1	4	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	4	U	1	5	0	0.1	T	S	0	1	T	0	1	D	8	0	
5	5	U	1	5	1	0.5	T	S	0	1	T	0	1	D	8	0	
5	6	U	1	5	2	0.1	T	S	0	1	T	0	1	D	8	0	
5	7	U	1	5	3	0.1	T	S	0	1	T	0	1	D	8	0	
5	8	U	1	5	4	0.1	T	S	0	1	T	0	1	D	8	0	
5	9	U	1	5	5	0.1	T	S	0	1	T	0	1	D	8	0	
6	0	U	1	5	6	0.1	T	S	0	1	T	0	1	D	8	0	
6	1	U	1	5	7	0.1	T	S	0	1	T	0	1	D	8	0	
6	2	U	1	5	8	0.1	T	S	0	1	T	0	1	D	8	0	
6	3	U	1	5	9	0.1	T	S	0	1	T	0	1	D	8	0	
6	4	U	1	6	0	0.1	T	S	0	1	T	0	1	D	8	0	
6	5	U	1	6	1	0.2	T	S	0	1	T	0	1	D	8	0	
6	6	U	1	6	2	0.1	T	S	0	1	T	0	1	D	8	0	
6	7	U	1	6	3	0.1	T	S	0	1	T	0	1	D	8	0	
6	8	U	1	6	4	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
6	9	U	1	6	5	0.1	T	S	0	1	T	0	1	D	8	0	
7	0	U	1	6	6	0.1	T	S	0	1	T	0	1	D	8	0	
7	1	U	1	6	7	0.1	T	S	0	1	T	0	1	D	8	0	
7	2	U	1	6	8	0.1	T	S	0	1	T	0	1	D	8	0	
7	3	U	1	6	9	0.1	T	S	0	1	T	0	1	D	8	0	
7	4	U	1	7	0	0.1	T	S	0	1	T	0	1	D	8	0	
7	5	U	1	7	1	0.1	T	S	0	1	T	0	1	D	8	0	
7	6	U	1	7	2	0.1	T	S	0	1	T	0	1	D	8	0	
7	7	U	1	7	3	0.1	T	S	0	1	T	0	1	D	8	0	
7	8	U	1	7	4	0.1	T	S	0	1	T	0	1	D	8	0	
7	9	U	1	7	6	0.1	T	S	0	1	T	0	1	D	8	0	
8	0	U	1	7	7	0.1	T	S	0	1	T	0	1	D	8	0	
8	1	U	1	7	8	0.1	T	S	0	1	T	0	1	D	8	0	
8	2	U	1	7	9	0.1	T	S	0	1	T	0	1	D	8	0	
8	3	U	1	8	0	0.1	T	S	0	1	T	0	1	D	8	0	
8	4	U	1	8	1	0.1	T	S	0	1	T	0	1	D	8	0	
8	5	U	1	8	2	0.1	T	S	0	1	T	0	1	D	8	0	
8	6	U	1	8	3	0.1	T	S	0	1	T	0	1	D	8	0	
8	7	U	1	8	4	0.1	T	S	0	1	T	0	1	D	8	0	
8	8	U	1	8	5	0.1	T	S	0	1	T	0	1	D	8	0	
8	9	U	1	8	6	0.1	T	S	0	1	T	0	1	D	8	0	
9	0	U	1	8	7	0.1	T	S	0	1	T	0	1	D	8	0	
9	1	U	1	8	8	0.1	T	S	0	1	T	0	1	D	8	0	
9	2	U	1	8	9	0.1	T	S	0	1	T	0	1	D	8	0	
9	3	U	1	9	0	0.1	T	S	0	1	T	0	1	D	8	0	
9	4	U	1	9	1	0.1	T	S	0	1	T	0	1	D	8	0	
9	5	U	1	9	2	0.1	T	S	0	1	T	0	1	D	8	0	
9	6	U	1	9	3	0.1	T	S	0	1	T	0	1	D	8	0	
9	7	U	1	9	4	0.1	T	S	0	1	T	0	1	D	8	0	
9	8	U	1	9	6	0.1	T	S	0	1	T	0	1	D	8	0	
9	9	U	1	9	7	0.1	T	S	0	1	T	0	1	D	8	0	
0	0	U	2	0	0	0.1	T	S	0	1	T	0	1	D	8	0	
0	1	U	2	0	1	0.1	T	S	0	1	T	0	1	D	8	0	
0	2	U	2	0	2	0.1	T	S	0	1	T	0	1	D	8	0	
0	3	U	2	0	3	0.1	T	S	0	1	T	0	1	D	8	0	
0	4	U	2	0	4	0.1	T	S	0	1	T	0	1	D	8	0	

5

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

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9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
0	5	U	2	0	5	0.1	T	S	0	1	T	0	1	D	8	0	
0	6	U	2	0	6	0.1	T	S	0	1	T	0	1	D	8	0	
0	7	U	2	0	7	0.1	T	S	0	1	T	0	1	D	8	0	
0	8	U	2	0	8	0.1	T	S	0	1	T	0	1	D	8	0	
0	8	U	2	0	9	0.5	T	S	0	1	T	0	1	D	8	0	
0	9	U	2	1	0	0.5	T	S	0	1	T	0	1	D	8	0	
1	0	U	2	1	1	0.5	T	S	0	1	T	0	1	D	8	0	
1	1	U	2	1	3	0.1	T	S	0	1	T	0	1	D	8	0	
1	2	U	2	1	4	0.1	T	S	0	1	T	0	1	D	8	0	
1	3	U	2	1	5	0.1	T	S	0	1	T	0	1	D	8	0	
1	4	U	2	1	6	0.1	T	S	0	1	T	0	1	D	8	0	
1	5	U	2	1	7	0.1	T	S	0	1	T	0	1	D	8	0	
1	6	U	2	1	8	0.1	T	S	0	1	T	0	1	D	8	0	
1	7	U	2	1	9	0.1	T	S	0	1	T	0	1	D	8	0	
1	8	U	2	2	0	0.5	T	S	0	1	T	0	1	D	8	0	
1	9	U	2	2	1	0.1	T	S	0	1	T	0	1	D	8	0	
2	0	U	2	2	2	0.1	T	S	0	1	T	0	1	D	8	0	
2	1	U	2	2	3	0.5	T	S	0	1	T	0	1	D	8	0	
2	2	U	2	2	5	0.1	T	S	0	1	T	0	1	D	8	0	
2	3	U	2	2	6	0.5	T	S	0	1	T	0	1	D	8	0	
2	4	U	2	2	7	0.5	T	S	0	1	T	0	1	D	8	0	
2	5	U	2	2	8	0.5	T	S	0	1	T	0	1	D	8	0	
2	6	U	2	3	4	0.1	T	S	0	1	T	0	1	D	8	0	
2	7	U	2	3	5	0.1	T	S	0	1	T	0	1	D	8	0	
2	8	U	2	3	6	0.1	T	S	0	1	T	0	1	D	8	0	
2	9	U	2	3	7	0.1	T	S	0	1	T	0	1	D	8	0	
3	0	U	2	3	8	0.1	T	S	0	1	T	0	1	D	8	0	
3	1	U	2	3	9	0.5	T	S	0	1	T	0	1	D	8	0	
3	2	U	2	4	0	0.1	T	S	0	1	T	0	1	D	8	0	
3	3	U	2	4	3	0.1	T	S	0	1	T	0	1	D	8	0	
3	4	U	2	4	4	0.1	T	S	0	1	T	0	1	D	8	0	
3	5	U	2	4	6	0.1	T	S	0	1	T	0	1	D	8	0	
3	6	U	2	4	7	0.1	T	S	0	1	T	0	1	D	8	0	
3	7	U	2	4	8	0.1	T	S	0	1	T	0	1	D	8	0	
3	8	U	2	4	9	0.1	T	S	0	1	T	0	1	D	8	0	
3	9	U	2	7	1	0.1	T	S	0	1	T	0	1	D	8	0	

EPA ID Number | N | V | T | 3 | 3 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

OMB#: 2050-0034; Expires 7/31/2012

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
4	0	U	2	7	8	0.1	T	S	0	1	T	0	1	D	8	0	
4	1	U	2	7	9	0.1	T	S	0	1	T	0	1	D	8	0	
4	2	U	2	8	0	0.1	T	S	0	1	T	0	1	D	8	0	
4	3	U	3	2	8	0.1	T	S	0	1	T	0	1	D	8	0	
4	4	U	3	5	3	0.1	T	S	0	1	T	0	1	D	8	0	
4	5	U	3	5	9	0.1	T	S	0	1	T	0	1	D	8	0	
4	6	U	3	6	4	0.1	T	S	0	1	T	0	1	D	8	0	
4	7	U	3	6	7	0.1	T	S	0	1	T	0	1	D	8	0	
4	8	U	3	7	2	0.1	T	S	0	1	T	0	1	D	8	0	
4	9	U	3	7	3	0.1	T	S	0	1	T	0	1	D	8	0	
5	0	U	3	8	7	0.1	T	S	0	1	T	0	1	D	8	0	
5	1	U	3	8	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	2	U	3	9	4	0.1	T	S	0	1	T	0	1	D	8	0	
5	3	U	3	9	5	0.1	T	S	0	1	T	0	1	D	8	0	
5	4	U	4	0	4	0.1	T	S	0	1	T	0	1	D	8	0	
5	5	U	4	0	9	0.1	T	S	0	1	T	0	1	D	8	0	
5	6	U	4	1	0	0.1	T	S	0	1	T	0	1	D	8	0	
5	7	U	4	1	1	0.1	T	S	0	1	T	0	1	D	8	0	

10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

12. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

Section 8 Details:

Section 8 Line 1 - S01 - Container Storage
CMU #1 294 cubic yards (58,400 gallons or 1,080 55 gallon drums), CMU #6 1,241 cubic yards (250,520 gallons or 5,588 55 gallon drums), CMU #7 400 cubic yards (80,778 gallons or 1,469 55 gallon drums), CMU #16 1,220 cubic yards (246,520 gallons or 4,482 55 gallon drums), and CMU #17 3,438 cubic yards (694,516 gallons or 12,627 55 gallon drums)
Total for line 1 = 6,593 cubic yards (1,331,910 gallons or 24,246 55 gallon drums)

Section 8 Line 2 - S02 - Tank Storage
PCB Tanks: T-4 7,500 gallons, T-5 7,500 gallons, T-6 5,000 gallons, T-7 5,000 gallons, and T-8 3,000 gallons
Leachate Tank: T-15 10,000 gallons
Total for line 2 = 38,000 gallons

Section 8 Line 3 - T01 - Tank Treatment
Evaporation Tank: T-11 10,000 gallons/day
Total for line 3 = 10,000 gallons/day

Section 8 Line 4 - T01 - Tank Treatment
Stabilization Tanks: T-1 45,000 gallons/day, T-2 252,000 gallons/day, T-3 252,000 gallons/day, T-18 68,500 gallons/day, and T-19 68,500 gallons/day
Total for line 4 = 686,000 gallons/day

Section 8 Line 5 - D80 Landfill Disposal
Trench 11 2.36 million cubic yards (below and above grade) and Trench 12 1.66 million cubic yards (below and above grade)
Total for line 5 = 4.02 million cubic yards

Debris Categories:
Toxicity characteristic debris
Debris contaminated with listed waste
Cyanide reactive debris
Waste PCB debris

List of Wastes Restricted from Management at USEN

[See Permit Condition 2.8]

The Permittee is not authorized to receive, treat, store, dispose of, or otherwise manage the following:

1. Any radioactive material that is not exempt from regulation and licensing or is not expressly authorized for disposal under this Permit or any radioactive or nuclear waste material, which requires specific licensing or permitting under any other rules of state or federal authorities for disposal or transshipment;

2. Compressed gases (not to include aerosol containers) or pressurized gases, including those contained in compressed gas cylinders;

3. Class 1, Division 1.1 or 1.2, or forbidden explosives (40 CFR Part 173.50), or any explosive material, as defined by USDOT under 49 CFR Part 173;

4. Biological Agents, Etiologic Agents or infectious wastes;

5. Bulk liquids for direct disposal, or containerized liquids (except lab packs) for direct disposal; or bulk hazardous liquids to which absorbents have been added (Use of liquids as dust suppression in accordance with Permit Application Section 11.3.10 is not considered disposal under this section);

6. Reactive material as defined in 40 CFR Part 261.23, that is not treated to meet the requirements of 40 CFR Part 268 prior to disposal;

7. Liquid organic peroxides with concentration exceeding 5% by volume; [NDEP-USEN e-mail dated January 9, 2008]

8. Containerized liquids (Lab packs) with biodegradable absorbents (40 CFR 264.316(b)

List of Activities Authorized at USEN

1. Collected leachate may be used for dust suppression within the same cell from which it was generated, provided the collected leachate never leaves the landfill in accordance with Permit Condition 7.2.2.
   [*see EPA memo dated May 23, 1996 in Permit Application Section 1, Appendix D*]

2. The Permittee may stage in Trench 12 interim process loads while awaiting verification testing, in accordance with Permit Application Section 8.7.4.
   [*see Permit Condition 7.11.1*]

The following documents are adopted herein as if fully set forth in this permit:

1. US Ecology RCRA Part B Application Volumes 1 and 2 -- October 29, 2009 and subsequent revisions

2. Final Cover Performance Monitoring System and Protocol, Disposal Trenches 11 and 12 -- November 2009, revised January 2010

3. The US Ecology, Beatty, Nevada Part A & B Permit Applications, Sections 1-9 (binder 1 of 2) and Sections 10-18 (binder 2 of 2) -- October 29, 2009, revised June 2010, May 2011 and September 2011.

4. Design Basis and Construction Specifications for Trenches 11 and 12 Final Covers -- April 2008

5. Landfill Report for Trench-12 -- Supplement, -- October 2007

6. Corrective Measures Study Report for US Ecology, Inc. HWMF -- April 1997

7. Response to Notice of Deficiency for the Trench 12 Design Report-- December 1996

8. Trench 12 Design Report Volumes 1 and 2 -- March 1996