



**OPERATING PLAN FOR
AREA 6 CLASS III
SOLID WASTE DISPOSAL SITE
PERMIT NO. SW 13 097 02**

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ACRONYMS AND ABBREVIATIONS

cm	centimeters
CFR	Code of Federal Regulations
CPR	Cardiopulmonary Resuscitation
dBA	A-weighted decibel(s)
DOE	U.S. Department of Energy
ft	foot/feet
in.	inches
m	meter(s)
mi	miles
M&O	Management and Operating
NAC	Nevada Administrative Code
NDEP/BFF	Nevada Division of Environmental Protection Bureau of Federal Facilities
NNSA/NFO	U.S. Department of Energy, National Nuclear Security Administration Nevada Field Office
NNSS	Nevada National Security Site
PCB	polychlorinated biphenyl
pCi/g	picocurie(s) per gram
ppm	part(s) per million
RCRA	Resource Conservation and Recovery Act
SWDS	Solid Waste Disposal Site
TCLP	Toxicity Characteristic Leachate Procedure

1.0 INTRODUCTION

This operating plan describes facilities, personnel, equipment, environmental controls, and processes that support Nevada Solid Waste Disposal regulations in Nevada Administration Code (NAC) Chapter 444, "Sanitation" (Sections 444.731–444.747 for Class III sites). NAC 444.733.4 states that an application for a Class III site must include a plan for operating the site as required by NAC 444.684. The scope of the operating plan is limited to the portions of the regulations that apply to Class III site operations. The operating plan's format follows the outline provided in the Class III Industrial Solid Waste Disposal Site Permit Application Form, Section III, 2. This plan applies to the Area 6 Class III Solid Waste Disposal Site (SWDS), hereafter referred to as Area 6 SWDS, operated under Permit No. SW 13 097 02.

2.0 SITE OVERVIEW

The Nevada National Security Site (NNSS) is located approximately 105 kilometers (65 mi [miles]) northwest of Las Vegas, Nevada. The U.S. Department of Energy, National Nuclear Security Administration Nevada Field Office (NNSA/NFO) is a federal lands management authority for the NNSS. The site is managed by a Management and Operating (M&O) Contractor. Access on and off the NNSS is tightly controlled, restricted, and guarded on a 24-hour basis. The NNSS is posted with signs along its entire perimeter.

The Area 6 SWDS is located in Yucca Flat on a roughly rectangular tract of land adjacent to the 6-01 Road, on the west edge of Yucca Lake, in Area 6, NNSS, Nye County, Nevada. Access to the interior of the Area 6 SWDS is controlled by a perimeter fence that has a locked chain at the entrance. There is a sign posted at the entrance of the Area 6 SWDS that clearly indicates the operator of the SWDS, the hours of operation, and prohibited waste.

The Area 6 SWDS serves as a repository for permissible waste generated at the NNSS, and with regulator permission from the NNSA/NFO's North Las Vegas Facility. The original disposal site was designed by a federal engineer and constructed in 1988. The site opened in early 1989 and approximately 1.8 million kilograms (4 million pounds) of putrescible and non-putrescible waste, of which 70 percent was putrescible, was received until mid- 1991. The site never proceeded into closure since the total capacity of the SWDS was not reached. Due to the increasing need for an area for the disposal of construction waste, a request was made to Nevada Division of Environmental Protection Bureau of Federal Facilities (NDEP/BFF) to utilize the unused portion of this SWDS for the disposal of the hydrocarbon-burdened solid waste generated by construction activities. The proposal was accepted in 1992, and a 1.5 meter (m) (5 foot [ft]) barrier layer of compacted soils was installed with three neutron monitoring tubes set in the barrier layer to monitor the possible permeation of liquid into the compacted soil.

In February 1993, NDEP/BFF approved the operation of this SWDS, after a critical review of the site's Operating Plan. The site continued operation with NDEP/BFF interim approval until 1997 when a permit was issued.

The SWDS accepted hydrocarbon – burdened construction waste from 1993 to the present. There has been a reduction in the generation of hydrocarbon-burdened waste, so with this modification, this facility now accepts construction waste that meets the waste acceptance criteria in Section 7.0, Waste Characterization and Acceptance Criteria.

The Report of Design as required per NAC 444.708 was provided to NDEP when the SWDS was originally approved. The Report of Design is not included with the August 2023 application since the original report is not available and the August 2023 application is not requesting additional cells or changes to the design of the SWDS.

3.0 LOCATION REQUIREMENTS

The location of the Area 6 SWDS has been approved by NDEP and the facility has operated at this location under an approved Operating Plan in accordance with the applicable regulations for over 30 years.

4.0 PERSONNEL REQUIREMENTS (WITH LEVEL OF AUTHORITY)/TRAINING (NAC 444.684)

The operator controls access during ongoing activities, determines the acceptability of the waste, and estimates the weight of the solid waste entering the Area 6 SWDS, at least one disposal operator will be in attendance during operation.

4.1 Training

The M&O Contractor is responsible for verifying that personnel assigned to support activities at the Area 6 SWDS meet the training requirements. Personnel assigned to this site receive training as outlined in Table 1 below, as applicable to the type of activity and role being performed. Employees, including subcontractor personnel, will not participate in field activities until they have been trained to a level required by their job function and responsibility. If work activities create additional training requirements not covered in this operating plan, the appropriate training will be identified, provided, and documented.

Table 1. Training Requirements

Course	Activity Level Work
General Employee Radiological Training	X
Toxic Metals/Beryllium/Lead Awareness	X
Asbestos Awareness	X
Hazard Communication	X
Fire Extinguishers (video)	X
Personal Protective Equipment	X
Driver Safety (for government vehicle use)	X
Hearing Conservation (if sound levels potentially exceed 85 dBA)	X
Bloodborne Pathogens	X
First Aid	X
Cardiopulmonary Resuscitation (CPR)	X

5.0 EQUIPMENT REQUIREMENTS WITH CONTINGENCIES AND DESCRIPTIONS

Radio and telephone communication will be brought to the Area 6 SWDS when operational.

Waste arrives at the Area 6 SWDS in luggers, roll-off boxes, flat bed and dump bed trucks, trailers, or similar receptacles.

The waste is managed at the Area 6 SWDS using equipment that includes but is not limited to dozers, a front-end loader, a non-potable water truck for dust control, a scraper to support driveway maintenance, a dump truck if needed, and forklifts. All equipment is maintained by the M&O Contractor in repair shops on the NNSS.

6.0 LITTER/DUST CONTROL PROGRAM

6.1 Litter Control

Litter control is based on the type and content of waste to be disposed and monthly cover with native soils. Windblown litter originating within the SWDS is not expected. However, the possibility exists for the lightweight industrial solid waste to be windblown. If lightweight material is observed at the surface, native soil will be added to prevent diversion. Workers remove, on a continuing basis, windblown material collected outside the perimeter fence within the Area 6 SWDS.

6.2 Dust Control

Water trucks will be used to spray water as needed to suppress dust on the compacted dirt roads and during operations involving the compaction material.

7.0 WASTE CHARACTERIZATION AND ACCEPTANCE CRITERIA

7.1 Summary

Waste characterization is a means of identifying the chemical and physical properties of the waste material to ensure that the solid waste accepted at Area 6 SWDS is not prohibited polychlorinated biphenyl (PCB) material; waste that will create an environmental hazard as described in Title 40 Code of Federal Regulations (CFR) Part 261, "Identification and Listing of Hazardous Waste," Subparts C and D; or otherwise prohibited waste. If the waste generator does not have adequate knowledge or if the SWDS operator questions the characterization, additional investigation will be done, including sampling and analysis or further research.

7.2 Process Knowledge

Generators characterize waste by their familiarity and experience with the process by which material was generated. Process knowledge relies on a waste generator's knowledge of the chemical properties of process ingredients, including concentration levels of contaminants in the ingredients at the start of the process and how each step of the process chemically and/or physically affects the processed material by adding, removing, producing, depleting, or neutralizing the contaminants in process ingredients, by-products, and/or finished products. Safety Data Sheets often are used as a means of identifying the process ingredients, and through the generator's knowledge of the process, the waste can be identified.

Process knowledge may also be "derived" through the repeated analyses of the same waste stream.

7.3 Processing In

Loads of waste are only accepted at the Area 6 SWDS when SWDS operators are present. Each load of waste is accompanied by the following paperwork:

- Signed load verification documents that contain waste characterization information, a statement on the absence prohibited materials, and the waste source by location
- Radiological clearance certification (only if waste came from an area with active or historic radiological activities)

Prior to entering the Area 6 SWDS, transporters of industrial waste provide the estimated weight. SWDS operators designate the area of disposal of the SWDS where the transporter offloads.

7.4 Waste Minimization/Segregation

It is NNSS policy to use waste minimization techniques to reduce waste generation. This occurs by separating waste at the point of generation or collection. Recyclable materials such as cardboard, scrap metal, and salvageable items are sold at auction or sent to offsite recycling facilities.

7.5 Waste Acceptance

7.5.1 Overview

Acceptable waste comes from the government agencies and contractors with operations at the NNSS, Federal Facility Agreement and Consent Order remediation sites in Nevada, and, on a case-by case basis and subject to approval from NDEP/BFF, from other NNSA/NFO operations within Nevada.

SWDS operators, prior to accepting waste, obtain a signed document attesting to:

- The absence of prohibited materials
- Waste characterization information that identifies the type of allowable waste and the process by which it was characterized (e.g., waste minimization/segregation, process knowledge, sampling and analysis)
- Source by location

This information must be prepared by the generator or a worker familiar with the waste as part of the load verification document and accepted by SWDS operators prior to the waste being disposed. Inadequate documentation is cause to refuse entry and disposal of any load of solid waste.

7.5.2 Permissible Waste

The Area 6 SWDS accepts industrial solid waste, including waste derived from construction, refurbishing, or demolition of buildings or other structures (NAC 444.585.1(p)); road materials; and vehicles carcasses and parts. The waste must be inert and non-putrescible and may consist of, but not be limited to, the following items of industrial solid waste:

- Soil
- Rocks and soil materials from construction sites
- Bushes and trees removed from construction sites
- Miscellaneous debris including metal, cloth, paper, plastic, rubber (excluding tires), etc.
- Empty containers
- Drained fuel filters (gasoline and diesel)
- Crushed non-terne plated oil filters
- Non-liquid hydrocarbon-contaminated waste
- Beryllium-contaminated non-hazardous (Resource Conservation and Recovery Act [RCRA]) solid waste generated at DOE facilities in North Las Vegas and at the Remote Sensing Laboratory–Nellis

- PCB waste identified in Section 7.5.4

7.5.3 Treated Sewage Sludge

Treated sewage sludge will be dried, and then it will be sampled and analyzed. Treated domestic sewage will be analyzed for constituents identified in 40 CFR 503, “Standards for the Use or Disposal of Sewage Sludge,” and contaminants listed in 40 CFR 261.4, using the Toxicity Characteristic Leachate Procedure (TCLP). Sewage sludge exceeding the TCLP limits in 40 CFR 261.4, Table 1, will be managed as hazardous waste.

7.5.4 PCB Waste

PCB waste that meets the requirements for disposal at the site, as specified in Table 2, is acceptable for disposal.

Table 2. Acceptable PCB Waste as specified in 40 CFR 761 and NAC 444.945

Acceptable PCB Waste	Acceptable concentrations
PCB Small Capacitors (40 CFR 761.60 (b)(2)(ii))	Any
PCB Hydraulic Machines, Drained (40 CFR 761.60 (b)(3)(i)(B) and (40 CFR 761.60 (b)(3)(ii))	<1,000 parts per million (ppm) PCBs
PCB Hydraulic Machines, Flushed (40 CFR 761.60 (b)(3)(i)(B) and (40 CFR 761.60 (b)(3)(ii))	≥1,000 ppm PCBs
PCB-Contaminated Electrical Equipment (40 CFR 761.60 (b)(4))	≥50 ppm but <500 ppm PCBs
Other PCB Articles (40 CFR 761.60 (b)(6)(ii)(A)(2))	<500 ppm PCBs
PCB Light Ballasts with PCBs in Non-Leaking Capacitors with <50 ppm PCBs in Potting Compound (40 CFR 761.62 (b)(1))	Any
Empty PCB Containers (40 CFR 761.60 (c)(2))	<500 ppm
PCB Bulk Product Waste including Plastic, Rubber Parts, Dried Paints/Similar Coating, Building Demolition Debris, or Similar Materials Expected to Leach (40 CFR 761.62 (b)(1)(i))	Any
Other PCB Bulk Product Waste Demonstrated to Leach <10 µg/L (40 CFR 761.62 (b)(1)(ii))	Any

7.6 Prohibited Waste

The following wastes are prohibited from disposal at the Area 6 SWDS:

- Waste that does not meet the surface activity release requirements in Article 422 of DOE/NV/03624--0257, “Nevada Test Site Radiological Manual,” or current revision, “Release to Uncontrolled Areas,” and exceeds the mass concentrations in 10 CFR 30.70 or Table 3 of this document. When radionuclides not identified in this section are known or suspected to be present in permissible wastes, applicable limits will be established before waste is accepted for disposal. All limits established for radionuclides not addressed in this section will be done with the concurrence of the NDEP/BFF.

Table 3. Radiological Volumetric Limits for NNSS Area 6 SWDS Disposal

Radionuclide*	Mass Concentration Limits (pCi/g)
$^{226}\text{Ra}^{**}$, ^{232}Th , ^{237}Np , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{241}Am , ^{242}Cm , ^{244}Cm	10
^{22}Na , ^{63}Ni , ^{90}Sr , ^{94}Nb , ^{99}Tc , ^{137}Cs , ^{152}Eu , ^{154}Eu , ^{151}Sm , ^{234}U , ^{235}U , ^{238}U , $^{241}\text{Pu}^{**}$, ^{125}Sb , ^{147}Pm , ^{60}Co	100

* Progeny in equilibrium with their parent radionuclide have been incorporated with these limits (e.g., ^{137}Cs , ^{90}Sr) and do not need a sum of fractions determination.

** ^{226}Ra is a daughter product of ^{238}U . ^{241}Pu is an activation product, not a fission product.

Based upon process knowledge, permissible waste generated outside controlled areas, as defined in DOE/NV/03624--0257, current revision, is assumed to have no added radioactivity and does not require surface contamination surveys or radiological analysis. Permissible waste generated inside controlled areas is segregated using one or more of the following: process knowledge, surface surveys, or radiological analysis.

When a mixture of radionuclides is known or potentially present, a sum of fractions must be performed using the following equation.

$$\sum_{i=1}^n \frac{C_i}{VL_i} \leq 1$$

Where C_i is the measured activity of radionuclide i ; VL_i is the mass concentration limit for radionuclide i ; and n is the number of radionuclides in the mixture.

- RCRA Hazardous Waste (as described in NAC 444.8565)
- Medical Waste (as described in NAC 444.589)
- Pathological Waste (as described in NAC 444.600)
- Refuse (as described in NAC 444.610)
- PCB Waste not listed in Section 7.5.5
- “Free Liquid” Waste (as described in NAC 444.692)
- Friable and Nonfriable Asbestos Waste

8.0 VECTOR CONTROL

Pathological waste (dead animals) and putrescible animal and vegetable waste are not permitted for disposal. Ordinary trash derived from personnel operations is collected and disposed of in a Class II SWDS on the NNSS. Therefore, additional vector controls are not necessary.

9.0 COVER REQUIREMENTS

Waste is spread evenly and compacted to form a lift that will not vary by more than 0.6 m (2.0 ft) along the face. The height of the lift can vary but will not exceed 2.0 m (6.6 ft). Each lift is covered with at least 15 centimeters (cm) (6 inches [in.]) of compacted earthen material. Compaction is accomplished by making at least two passes with a dozer or an equivalent piece of equipment.

Waste that has confined open areas (e.g., boxcars) will be filled as completely as possible with native soil or other inert material. Bulky items will be covered with the major axis horizontal to minimize the lift height.

It is not expected that large quantities of combustible construction and demolition debris will be disposed at the site. Therefore, the requirements of NAC 444.652, which require cross-sectioned cells separated by compacted cover material, are not applicable.

Waste is covered and compacted within 30 days of disposal per NAC 444.731(2). Prior to compaction, waste is spread evenly. A dozer or similar equipment makes at least two passes over the waste and compresses it to at least 0.6 m (2 ft).

10.0 INSPECTIONS AND OPERATING RECORDS

10.1 Area 6 SWDS Inspections

The SWDS will be inspected daily when waste is accepted. The inspection will consist of the following items:

- Erosion of the berm or walls
- Settling of the covered material
- Condition of fencing
- Condition of roadway
- Accumulation of litter
- Accumulation of water

Each inspection will be noted. Corrective measures will be taken as soon as possible to correct the deficiency. All corrective measures and their completion dates will be recorded.

10.2 Waste Inspections

SWDS personnel will inspect, at minimum, one randomly selected load of waste on a monthly basis. Once the waste has been dumped onto the ground, the inspector will closely examine the load of waste to verify that only acceptable items are present. Each inspection will be documented and placed in the SWDS operating record.

If prohibited waste is identified by site personnel during normal operations or inspections, the item(s) will be removed from the working face and segregated. If necessary, the SWDS will be temporarily closed pending remediation. An investigation of the circumstances that resulted in the receipt of unacceptable items, and proper disposition of those materials, will follow. NDEP/BFF will be notified if prohibited waste is disposed.

10.3 Operating Records

Records and logs will be maintained by designated SWDS personnel. The following documentation must be present with each load of permissible waste:

- A load verification document
- Analytical results or written documentation of process knowledge

- Estimated weight
- Radioactive Material Clearance (when needed)

Before acceptance, the SWDS operator will ensure that all documentation is complete, accurate, and legible. If the documentation is not acceptable, the SWDS operator will reject the waste for disposal. The disposal operator may also reject the waste if, upon a random inspection, it is determined that the waste does not conform to the waste acceptance criteria (Sections 7.5.2 through 7.5.4) or is falsely represented.

The amount and source of permissible waste delivered to the Area 6 SWDS will be documented in the operating record. Additional documentation required as operating records are Access Records and Inspection Checklists.

10.4 Annual Report

As specified in NAC 444.747, a solid waste annual report is submitted to NDEP/BFF. The report contains the weight of industrial solid waste disposed at the Area 6 SWDS the previous calendar year and any exceptions to the waste acceptance criteria.

11.0 CONTINGENCY/EMERGENCY PLAN

11.1 Medical Emergency

Employees are trained in first aid and CPR (see Table 1). Emergency medical services (EMS) are located in Area 23 (Mercury), approximately 18 mi away. This EMS facility operates Monday through Thursday, 7:00 a.m. to 5:30 p.m. SWDS personnel may contact medical services by calling 702-295-1718 or 911 or by using a “Mayday” signal on the NNSS radio communication system. Additional emergency services are available 24 hours a day through the Fire Department, approximately 1.9 mi away. All operators always have an NNSS radio and cell phone with them.

11.2 Fire

Open burning of solid waste is prohibited by NAC 444.6675. However, fires could be initiated through malfunction of electrical devices or Area 6 SWDS equipment. Fire extinguisher is brought in when the Area 6 SWDS is operational.

SWDS personnel will use hand-held fire extinguishers to control small fires. Where fires cannot be extinguished with small, hand-held extinguishers, the NNSS Fire Department will be notified by calling 911 on the telephone or using a “Mayday” signal on the NNSS radio communication system. Under no circumstances will SWDS operators attempt to extinguish a large fire without instructions from the NNSS Fire Department.

The fire station serving the Area 6 SWDS is located in Area 6 (approximately 1.9 mi away) and operates 24 hours per day, 7 days a week.

11.3 Inclement Weather

The Area 6 SWDS is not operated in heavy rain or other severe storms. The SWDS is protected from run-off water using land contouring and soil berms. However, rain falling directly on the site may result in localized muddy conditions, which requires the SWDS be closed for short periods of time until additional native soil is added to muddy areas to provide a workable surface.

12.0 GROUNDWATER/METHANE MONITORING

12.1 Groundwater Monitoring

A minimum 1.5 m (5 ft) compacted soil barrier was installed in late 1992 before opening the site for the disposal of permissible waste. The purpose of the soil layer is to segregate the two different portions of the disposal site and inhibit leaching through the barrier, thus acting as a liner for the permissible waste. A monitoring system designed to detect leachate and moisture mobility through the five-foot layer of compacted soil, as well as monitor changes in the industrial solid waste, was installed.

As an indicator of the amount of water and hydrocarbon leachate entering into the soil barrier, three neutron access tubes were installed in the hydrocarbon waste disposal floor to monitor the moisture content of the compacted soil barrier that separates the former sanitary landfill disposal operation from the current hydrocarbon waste disposal operation. These access tubes were situated to optimize the areal coverage of the monitoring system within the compacted soil layer.

Initial neutron logging started in March 1993. Annual readings were performed until 2017 to determine if water has entered this barrier. Under an agreement with NDEP/BFF in 2017, the minimum monitoring frequency of the neutron tubes changed from annual to biennial. Additional monitoring will be conducted within 3 months following a 24-hour rain event exceeding 1.5 in., as measured by weather monitoring station A06AE or next nearest station if A06AE is not available.

The Action Level requiring notification to the NDEP/BFF is defined as a 100-percent change (i.e., doubling) of the average count per minute in the five-foot layer at any access tube. NDEP/BFF will be notified of any Action Level reached or exceeded within 21 days of the confirmation. Logging will continue biennially throughout the active life of the Area 6 SWDS. Only changes within the five-foot layer of compacted soil will trigger a response to NDEP/BFF; changes within the waste will simply be monitored. Continued use of the system will be addressed in the closure and post-closure plans for the site.

12.2 Methane Monitoring

Based on the physical and chemical composition of buried materials and low annual rainfall at the SWDS, the generation and accumulation methane gas is considered minimal to non-existent. Therefore, methane gas monitoring is not necessary.

13.0 LEACHATE MANAGEMENT

There is no leachate collection device at Area 6 SWDS.

14.0 SURFACE WATER REQUIREMENTS (DRAINAGE FROM ACTIVE AREAS)

The Area 6 SWDS is not operated in heavy rain or other severe storms. It is protected from run-off water using land contouring and soil berms. However, rain falling directly on the SWDS may result in localized muddy conditions, which require the SWDS to be closed for a short period of time until additional native soil is added to muddy areas to provide a workable surface.

15.0 CLOSURE/POST-CLOSURE PROCEDURES/REQUIREMENT WITH FINANCIAL ASSURANCE

15.1 Closure

NDEP/BFF will be notified in writing of an intent to close the disposal site at least 15 days before beginning closure activities. Closure activities will commence within 30 days of written acceptance of the plan by NDEP/BFF and will be completed within 180 days after beginning the closure.

It is anticipated that the disposal site will be used until permissible waste reaches an elevation of approximately 1,200 m (3,937 ft). The final design will incorporate a cap configuration that will have a slope of not less than three percent to the center and be graded along the sides to drain surface water.

The cover will consist of an infiltration layer containing a minimum 0.46 m (18 in) of earthen material having a capability that is less than the permeability of the natural subsoils, but not greater than 1×10^5 cm/sec. Quality assurance checks will guarantee that the infiltration layer has met the specification requirements before completion of the final cover. An erosion layer, consisting of at least 15.2 cm (6 in) of native soil, will be placed on the infiltration layer. The erosion layer will be vegetated with native plants to stabilize the surface and reduce wind and water erosion.

An alternative design that meets or exceeds infiltration requirements, controls erosion, maintains cover stability, and protects the ground waters of Nevada may be recommended at the time of closure.

The closure plan will address all steps that will be taken to complete closure. This information will consist of a plan discussing the cover specifications, an estimate of the total volume of waste placed in the disposal site during its lifetime, decommissioning of any equipment or structures, and the installation of water, vadose zone, and/or gas monitoring devices, as required. The plan will meet all applicable regulations and will follow all relevant and appropriate regulations to the extent possible.

15.2 Post-Closure

The post closure program will consist of a plan to maintain the integrity and effectiveness of the final cover and identifies a process to correct the effects of settlement, subsidence, erosion, or other circumstance which may affect the integrity of the final cover.

The post closure program will be conducted for a period of 30 years. However, the land manager/operator maintains the right to request a waiver from the items listed above or request a waiver in the time period, if it can be demonstrated that a modified program is sufficient to protect public health and safety and the environment.

15.3 Financial Assurance

Not applicable to Federal Government facilities (NAC 444.682(2a)).

16.0 MISCELLANEOUS REQUIREMENTS

16.1 Scavenging

Scavenging and salvaging are not permitted in the Area 6 SWDS.

16.2 Inspections

Refer to Section 10.0.

16.3 Weighing and Measuring Waste

Refer to Section 10.3.

16.4 Annual Report

Refer to Section 10.4.

16.5 Approval by Solid Waste Management Authority

Refer to Section 2.0.

16.6 Financial Assurance

Refer to Section 15.3.

16.7 Closure and Post-Closure Care

Refer to Sections 15.1 and 15.2.

16.8 Site Location

Refer to Sections 2.0 and 3.0.

16.9 Waste Characterization

Refer to Section 7.0.

16.10 Groundwater Monitoring

Refer to Section 12.1.

16.11 Changes to Documents

Changes requiring approval will be submitted to NDEP/BFF.

16.12 Alternative Schedule for Recordkeeping and Notification

No alternative schedule is requested for recordkeeping or notification requirements.