

**DRAFT**

**Resource Conservation and Recovery Act  
Hazardous Waste Facility Management Permit**

**Permit No. AK9 69033 0742**

March 2021

Issued to:

**United States Coast Guard (USCG)  
Base Kodiak, Alaska**

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Permit No. AK9 69033 0742  
Expiration Date: March 31, 2031  
DRAFT

HAZARDOUS WASTE MANAGEMENT FACILITY  
PERMIT

U.S. Environmental Protection Agency Region 10 (AWT-121)  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101  
(206) 553-1253

Issued in accordance with the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et. seq., and the Hazardous and Solid Waste Amendments of 1984 (HSWA), and the regulations promulgated thereunder in Title 40 of the Code of Federal Regulations (C.F.R.) Parts 124 and 260 through 271).

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ISSUED TO: UNITED STATES COAST GUARD (USCG)  
EPA I.D. No.: AK9 69033 0742

This Permit is effective as of April 1, 2021, and shall remain in effect until March 31, 2031, unless revoked and reissued under 40 C.F.R. § 270.41, or terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a). This Permit will be reviewed five (5) years after the date of issuance, in accordance with Section 3005(c)(3) of RCRA, 42 U.S.C. § 6925(c)(3), and 40 C.F.R. § 270.50, and will be modified to assure that the facility continues to comply with the currently applicable requirements of Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925.

ISSUED BY: The U.S. ENVIRONMENTAL PROTECTION AGENCY

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Timothy B. Hamlin, Director  
Land, Chemicals, and Redevelopment Division  
U.S. Environmental Protection Agency, Region 10

Date \_\_\_\_\_

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### **LIST OF ATTACHMENTS**

The following Attachments describing specific requirements from the Permittee's RCRA permit application are hereby incorporated as enforceable conditions of this Permit. In the event of any inconsistencies between a permit condition and an Attachment, the permit condition shall prevail.

**Attachment 1 - RCRA Part A Permit Application and Facility Description**

**Attachment 2 - Base Kodiak Hazardous Waste Storage Building, Waste Analysis Plan**

**Attachment 3 - Personnel Training Outline**

**Attachment 4A - Consolidated Post-Closure Plan: Site 3 - Coast Guard Laundry, Site 7A - Barrel Storage Area No.1 and Site 6A - MOGAS**

Appendix A: RCRA Quarterly Sampling and Analysis Plan

Appendix B: Post-Closure Groundwater Monitoring Quality Assurance Project Plan

**Attachment 4B - Closure Plan for the Hazardous Waste Storage Building (Building N-48)**

**Attachment 5 - Container Storage Area Plans and Specification Process Information**

**Attachment 6 - Procedures to Prevent Hazards**

**Attachment 7 - Solid Waste Management Units and Schedule of Compliance**

**Attachment 8 - RCRA Corrective Action Plan**

**Attachment 9 - Well Decommissioning Plan**

**Attachment 10 - Land Use Control Assurance Plan for Environmental Cleanup Activities**

**Attachment 11 - Summaries of Selected Remedies**

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## INTRODUCTION

Permittee: U.S. Coast Guard Base Kodiak  
EPA ID Number: AK9 69033 0742

Pursuant to the Resource Conservation and Recovery Act of 1976, as amended, 42 U.S.C. § 6901 et seq., (RCRA), and the Hazardous and Solid Waste Amendments of 1984 (HSWA), and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations); a permit is hereby issued to United States (U.S.) Coast Guard (USCG; hereafter called the Permittee) to operate hazardous waste container storage units in Building N-48, and for post-closure of Site 3 (Laundry), Site 6A (MOGAS), and Site 7A (Barrel Storage Area One), and for corrective action, at the USCG Base Kodiak, Kodiak, facility, geographically located in the Municipality of Kodiak, Alaska, at latitude 57 degrees 45 minutes North and longitude 152 degrees 15 minutes West.

The Permittee must comply with all terms and conditions of this hazardous waste facility permit. This Permit consists of the conditions contained herein (including those in any attachments), and the applicable regulations contained in 40 C.F.R. Parts 260 through 264, 266, 268, 270, and 124. Any management of hazardous waste subject to 40 C.F.R. Parts 264 or 265, which is not authorized by this Permit, is prohibited.

Nothing in this Permit shall limit the Agency's authority to undertake, or require any person to undertake, response action or corrective action under any law, including, but not limited to, Section 104 or 106 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Sections 9604 and 9606, and Section 7003 of RCRA, 42 U.S.C. Section 6973. Nor shall any permit condition relieve the Permittee of any obligations under any law, including, but not limited to, Section 103 of CERCLA, 42 U.S.C. Section 9603 to report releases of hazardous wastes, constituents, or substances to, at, or from the facility.

Applicable federal regulations are those which are in effect on the date of final administrative action on this Permit and any self-implementing statutory provisions and related regulations which, according to the requirements of RCRA (as amended), are automatically applicable to the Permittee's hazardous waste

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management activities, notwithstanding the conditions of this Permit.

This Permit is based upon the administrative record, as required by 40 C.F.R. § 124.9. The Permittee's failure in the application or during the Permit issuance process to fully disclose all relevant facts, or the Permittee's misrepresentation of any relevant facts at any time, shall be grounds for the termination or modification of this Permit and/or initiation of an enforcement action, including criminal proceedings. The Permittee shall inform the Administrator of noncompliance with any condition of the Permit or changes to the information provided in the Part B Permit Application that might affect the ability of the Permittee to comply with applicable regulations and permit conditions, or which alter any of the conditions of the Permit in any way.

This Permit includes the provisions of Section 206, 212, and 224 of the Hazardous and Solid Waste Amendments of 1984 (HSWA), which amended Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925. In particular, Section 3004(u), 42 U.S.C. § 6924(u) requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit. Section 212 of HSWA provides that permits shall be for a fixed term not to exceed ten (10) years. Section 3005(c), 42 U.S.C. § 6925(c), provides the Administrator with authority to review and modify the Permit at any time. Under Section 6925(h) of RCRA, 42 U.S.C. § 6925(h), RCRA permits for hazardous waste management on the premises where the waste was generated must require the Permittee to certify efforts taken to minimize the amount and toxicity of hazardous waste.

At this time, the State of Alaska does not have an authorized RCRA program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926. Therefore, this RCRA Permit is issued by EPA since EPA has primacy under RCRA to enforce it.

## DEFINITIONS

For purposes of this Permit, the following definitions shall apply:

- a. All definitions contained in 40 C.F.R. Parts 124 and 260-270 are hereby incorporated by reference into this Permit.

Where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be the standard dictionary definition, or their generally accepted scientific or industrial meaning.

- b. Unless otherwise noted, all schedules refer to calendar time; i.e. thirty (30) days means thirty (30) calendar days.
- c. **"Administrator"** shall mean the Region 10 Regional Administrator of the U.S. Environmental Protection Agency (EPA) or a designated representative. The Director, Office of Air, Waste and Toxics, EPA Region 10, (with the address as specified on page one of this Permit), is a duly authorized and designated representative of the Administrator for purposes of this Permit.
- d. **"Agency"** shall mean the U.S. Environmental Protection Agency, Region 10 (with the address as specified on page one of this Permit).
- e. **"Elements"** (in the context of "Corrective Action Elements") shall refer to individual components of the remedy such as a landfill cap or an air sparging/soil vapor extraction (AS/SVE) system
- f. **"Facility"** shall mean the property owned by the U.S. Coast Guard, Base Kodiak, to include all contiguous land, and structures, other appurtenances, and improvements on the land, used for treatment, storing, or disposing of hazardous waste, or for managing hazardous secondary materials prior to reclamation.
- g. **"Hazardous constituent"** means any constituent identified in Appendix VIII of 40 C.F.R. Part 261, or any constituent identified in Appendix IX of 40 C.F.R. Part 264.
- h. **"Permit"** shall mean the Permit issued by the Environmental Protection Agency, Region 10 pursuant to 42 U.S.C. Section 3251 eq seq., 40 C.F.R. Parts 124 and 270.
- i. **"Permittee"** means the USCG.

- j. **"Release"** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous waste (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).
- k. **"Solid waste management unit"** means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which hazardous wastes or hazardous constituents have been routinely and systematically released.
- l. **"Work"** shall mean any activity the Permittee is required to perform under the permit.

**PART I - STANDARD CONDITIONS**

**I.A. EFFECT OF PERMIT**

I.A.1. The Permittee is allowed to store hazardous waste and to conduct post-closure care and corrective action in accordance with the conditions of this Permit. Any storage of hazardous waste governed by 40 C.F.R. 264 or 265 not authorized in this Permit is prohibited. Compliance with this Permit during its effective term constitutes compliance, for purposes of enforcement, with 40 C.F.R. Parts 264 and 270, for the hazardous waste activities identified and included in this Permit, except for any self-implementing provisions and related regulations pursuant to HSWA. All other requirements of RCRA, including the generator requirements of 40 C.F.R. Part 262 and 268, remain applicable to this facility and are not replaced or affected by this Permit.

I.A.2. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under any other federal or state law providing for protection of public health or the environment, including but not limited to, Section 3013 or 7003 of RCRA, 42 U.S.C. § 6934 or 6973, or any section of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9601 et seq. [40 C.F.R. § 270.4]

**I.B. PERMIT ACTIONS AND MODIFICATIONS**

I.B.1. This Permit may be modified, revoked and reissued, or terminated for cause, as specified in 40 C.F.R. §§ 270.41, 270.42, and 270.43.

I.B.2. Filing a request for a permit modification, revocation and reissuance, or termination, or filing a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

I.B.3. Except as provided by specific language in this Permit, any modification or change in a hazardous waste management practice covered by this Permit must be accomplished in accordance with 40 C.F.R. §§ 270.41 or 270.42.

I.B.3.a. A written request must be submitted at least sixty (60) days prior to the proposed change in facility design or operation, or not later than sixty (60) days after an unexpected event has occurred which has affected the permit. The Administrator will approve, disapprove, or modify this request, in accordance with the procedures in 40 C.F.R. Parts 124 and 270.

I.B.3.b. If the Permittee determines that the corrective action or groundwater monitoring programs required by this Permit no longer satisfy the requirements of the regulations, the Permittee must, within ninety (90) days, submit a written request for a permit modification to make those changes deemed necessary to satisfy the regulations.

**I.C. SEVERABILITY**

I.C.1. The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit to any circumstances, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision, which forms the basis for any condition of this Permit, does not affect the validity of any other state or federal statutory or regulatory basis for said condition. [40 C.F.R. § 124.16(a)(2)].

I.C.2. In the event that a condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the conditions of the existing permit which correspond to the stayed conditions until final resolution of the stayed condition unless the Agency determines that compliance with the existing conditions would be technologically incompatible with compliance with other conditions of this Permit which have not been stayed.

**I.D. PERSONAL AND PROPERTY RIGHTS**

I.D.1. The Permittee shall hold harmless and indemnify the Agency, and its officers, employees, and agents from any claim, suit, or action arising from the activities of

the Permittee or its contractors, agents, or employees under this Permit.

I.D.2. Issuance of this Permit does not convey any property rights or any exclusive privilege, nor does issuance of the Permit authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, state or local laws or regulations. [40 C.F.R. § 270.30(g)]

**I.E. DUTY TO COMPLY**

I.E.1. 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 issued in accordance with 40 C.F.R. § 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; and/or for denial of a permit renewal application. [40 C.F.R. § 270.30(a)]

I.E.2. Compliance with the terms of this Permit does not constitute a defense to any action brought under Sections 3007, 3008, 3013, and 7003 of RCRA (42 U.S.C. §§ 6927, 6928, 6934, and 6973); CERCLA (42 U.S.C. § 9601 et. seq.); or any other federal or state law governing protection of public health or the environment.

**I.F. DUTY TO REAPPLY**

If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, or if the Permittee is required to conduct post-closure care, or if the Permittee is required to continue corrective action for releases from solid waste management units, the Permittee must reapply for and obtain a new permit, in accordance with 40 C.F.R. §§ 270.10(h), 270.30(b).

The corrective action obligations contained in this Permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

**I.G. CONTINUATION OF EXPIRING PERMIT**

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 (40 C.F.R. §§ 270.10, 270.13 through 270.29); and, through no fault of the Permittee, the Administrator has not issued or denied the new permit, as set forth in 40 C.F.R. § 270.51.

This Permit may be modified or revoked and reissued, and in accordance with 40 C.F.R. § 270.41 and/or 40 C.F.R. § 270.42.

**I.H. 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 C.F.R. § 270.30(c)]

**I.I. 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.

Such mitigation shall not be a defense to enforcement action. [40 C.F.R. § 270.30(d)]

**I.J. 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 include 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 to maintain compliance with the conditions of this Permit. No provision of this Permit shall be interpreted to require the Permittee to obligate funds in violation of the Anti-Deficiency Act, 31 U.S.C. Section 1341. [40 C.F.R. § 270.30(e)]

**I.K. DUTY TO PROVIDE INFORMATION**

The Permittee shall furnish to the Administrator, within a reasonable time, any relevant information which the Administrator 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 Administrator, upon request, copies of records required to be kept by this Permit. [40 C.F.R. §§ 264.74(a), and 270.30(h)]

**I.L. INSPECTION AND ENTRY**

Pursuant to 40 C.F.R. § 270.30(i), the Permittee shall allow the Administrator, or authorized representatives, upon the presentation of credentials and other documents as may be required by law to:

- I.L.1. Enter at reasonable times upon the Permittee's premises where a regulated facility or hazardous waste management activity or corrective action activity is located or conducted, or where records must be kept under the conditions of this Permit;
- I.L.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- I.L.3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- I.L.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.

**I.M.                                    MONITORING AND RECORDS**

I.M.1.            Samples and measurements taken by the Permittee 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 most recent appropriate method from Appendix I of 40 C.F.R. Part 261.

The Permittee shall use techniques and procedures consistent with the most recent EPA guidance when collecting, preserving, shipping, analyzing, tracking, and controlling samples. [40 C.F.R. § 270.30(j)(1)]

I.M.2.            Except as specifically required elsewhere (i.e. Permit Condition I.Y), the Permittee shall retain at the facility, 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, certification required by 40 C.F.R. § 264.73(b)(9), and records of all data used to complete the application for this Permit for a period of at least thirty-six (36) months from the date of the sample, measurement, report, record, certification, or application.

This period may be extended by the Administrator at any time by notification, in writing, to the Permittee and is automatically extended during the course of any unresolved enforcement action regarding the Permit until the successful conclusion of any enforcement action. [40 C.F.R. § 270.30(j)(2)]

I.M.3.            Pursuant to 40 C.F.R. § 270.30(j)(3), records of groundwater and air monitoring information, specific to post-closure and corrective action, shall specify:

I.M.3.a.            The dates, exact place, and times of sampling or measurements;

I.M.3.b.            The name, title and affiliation of the individual(s) who performed the sampling or measurements;

I.M.3.c.            The dates the analyses were performed;

I.M.3.d. The name, title and affiliation of the individual(s) who performed the analyses;

I.M.3.e. The analytical techniques or methods used; and

I.M.3.f. The results of such analyses, including the Quality Assurance/Quality Control (QA/QC) summary.

I.M.4. The Permittee may substitute analytical methods which are equivalent to those specifically approved for use in this Permit in accordance with the following:

I.M.4.a. The Permittee submits to the Administrator a request for substitution of an analytical method(s) which is equivalent to the method(s) specifically approved for use in this Permit.

The request shall provide information demonstrating that the proposed method(s) is equal or superior to the approved analytical method(s) in terms of sensitivity, accuracy, and precision (i.e. reproducibility); and,

I.M.4.b. The Administrator notifies the Permittee in writing, that the substitution of the analytical method(s) is approved. Such approval shall not require a permit modification.

**I.N. REPORTING PLANNED CHANGES**

The Permittee shall give notice to the Administrator as soon as possible of any planned physical alterations or additions to RCRA regulated hazardous waste management units at U.S. Coast Guard, Base Kodiak, or of any activity which will physically alter or add to the permitted hazardous waste management units, or would result in noncompliance with permit requirements. [40 C.F.R. § 270.30(1)(1)]

**I.O. REPORTING ANTICIPATED NONCOMPLIANCE**

The Permittee shall give advance notice, in writing, to the Administrator of any planned change(s) in the permitted facility or any activity which may result in noncompliance with permit requirements. If advance notice is not possible, then the Permittee shall give notice within twenty-four (24) hours of the time the

Permittee becomes aware of the anticipated noncompliance. Such notice does not authorize any noncompliance with this Permit or modification of this Permit. [40 C.F.R. § 270.30(1)(2)]

**I.P.                    TRANSFER OF PERMITS**

This Permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 C.F.R. §§ 270.40(b), 270.41(b)(2) and 270.42.

Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 C.F.R. Parts 264 and 270 and this Permit. [40 C.F.R. §§ 264.12 and 270.30(1)(3)]

**I.Q.                    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 shall be submitted no later than fourteen (14) days following each schedule date.

The Permittee shall follow the compliance schedules contained in Part V of this Permit. [40 C.F.R. § 270.30(1)(5)]

**I.R.                    TWENTY-FOUR HOUR REPORTING**

I.R.1.                The Permittee shall report to the Administrator any noncompliance with the Permit which may endanger human health or the environment.

Any such information shall be reported orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances/non-compliance.

The report shall include the following:

I.R.1.a.             Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.

I.R.1.b.             Any information of a release or discharge of hazardous waste or a fire or explosion relating to hazardous waste management at U.S. Coast Guard,

Base Kodiak, which could threaten the environment or human health.

- I.R.2. The description in the oral report of the occurrence and its cause shall include:
- I.R.2.a. Name, address, and telephone number of the owner or operator;
  - I.R.2.b. Name, address, and telephone number of the facility;
  - I.R.2.c. Date, time, and type of incident;
  - I.R.2.d. Name and quantity of material(s) involved;
  - I.R.2.e. The extent of injuries, if any;
  - I.R.2.f. An assessment of actual or potential hazards to the environment and human health, where this is applicable;
  - I.R.2.g. Estimated quantity and disposition of recovered material that resulted from the incident; and
  - I.R.2.h. A qualitative review of actions taken, intended responses, and remedial actions.
- I.R.3. A written submission shall also be provided within five (5) days of the time the Permittee becomes aware of the circumstances/non-compliance. The written submission shall contain a description of the noncompliance, its extent, and its cause; the period(s) of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; corrective measures taken to mitigate the situation and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

The Director may waive the five (5) day written notice requirement in favor of a written report within fifteen (15) days. [40 C.F.R. § 270.30(1)(6)]

**I.S. OTHER NONCOMPLIANCE**

The Permittee shall report to the Administrator all other instances of noncompliance not otherwise required

to be reported in the monitoring reports, compliance schedules, and twenty-four (24) hour reports above, at the time monitoring reports are submitted.

The reports shall contain the information listed in Permit Condition I.R. [40 C.F.R. § 270.30(1)(10)]

**I.T.                    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 Administrator, the Permittee shall promptly submit such facts or information to the Administrator. [40 C.F.R. § 270.30(1)(11)]

**I.U.                    BIENNIAL REPORT**

The Permittee shall comply with Biennial Report requirements of 40 C.F.R. § 264.75.

**I.V.                    SIGNATURE AND CERTIFICATION**

Failure to submit the information required in this Permit, or falsification of any submitted information, is grounds for termination of this Permit, in accordance with 40 C.F.R. § 270.43.

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrator, required in this Permit, are signed and certified, in accordance with 40 C.F.R. § 270.11.

**I.W.                    REPORTS, NOTIFICATION AND SUBMISSIONS**

All reports, notifications, or other submissions which are required by this Permit to be sent or given to the Administrator must be sent by email, electronic file transfer, certified mail, or given directly to:

EPA RCRA Project Manager (MS-15-H04)  
Division of Land, Chemicals, and Redevelopment  
U.S. EPA, Region 10  
1200 Sixth Avenue, Suite 155  
Seattle, Washington 98101-3140  
Telephone number: (206) 553-6702

Note: This is the current address and phone number and may change without modification of the Permit.

**I.X. CONFIDENTIAL INFORMATION**

The Permittee may claim confidential any information required to be submitted by this Permit, in accordance with 40 C.F.R. §§ 260.2 and 270.12.

**I.Y. DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

The Permittee shall maintain at the facility until closure is completed and certified by an independent registered professional engineer, and have readily available for inspection, the following documents and amendments, revisions and modifications to these documents:

- I.Y.1. Waste Analysis Plan (Attachment 2 of this Permit), and monitoring, testing or analytical data from monitoring activities, as required by 40 C.F.R. § 264.13 and this Permit.
- I.Y.2. Records and results of each waste analysis performed in accordance with this Permit.
- I.Y.3. Personnel training documents, certifications, and records, as outlined in Attachment 3 of this Permit, as required by 40 C.F.R. § 264.16(d) and this Permit.
- I.Y.4. Contingency Plan, as required by 40 C.F.R. § 264.53(a) and this Permit.
- I.Y.5. Closure and Post-Closure Plans (Attachments 4A and 4B of this Permit), as required by 40 C.F.R. § 264.112(a) and this Permit.
- I.Y.6. Operating record, containing the documents required by 40 C.F.R. § 264.73 and this Permit.
- I.Y.7. Inspection schedule(s), as required by 40 C.F.R. § 264.15(b)(2) and this Permit.
- I.Y.8. Hazardous Waste Management Facility Permit, including all attachments.
- I.Y.9. RCRA Part B Permit Application, dated August 1, 2007, including all attachments.

- I.Y.10. Summaries of all records of the corrective action, including any cessation of remediation activities and measures taken to mitigate and prevent further cessations.
- I.Y.11. Assessment reports pursuant to Permit Condition II.I of all incidents that require implementation of the contingency plan.
- I.Y.12. Record of spills and releases.
- I.Y.13. Copies of all other environmental permits associated with the hazardous and solid waste management units.
- I.Y.14. Well construction, maintenance and replacement records pursuant to Permit Condition VI.C.

**PART II - GENERAL FACILITY CONDITIONS**

**II.A. DESIGN AND OPERATION OF FACILITY**

The Permittee shall design, construct, maintain and operate the facility:

(1) to avoid, reduce, or eliminate waste that may be generated from accidental spills, mishandling of containers, and other such activity; and

(2) to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, which could threaten human health or the environment, as required by 40 C.F.R. § 264.31.

**II.B. REQUIRED NOTICE**

II.B.1. When the Permittee is to receive hazardous waste from an off-site source, the Permittee must inform the generator in writing that the Permittee has the appropriate permit(s) for, and will accept the waste the generator is shipping.

The Permittee must keep a copy of this written notice for each generator as part of the operating record, in accordance with 40 C.F.R. § 264.12(b), 40 C.F.R. § 264.73(b)(7).

The Permittee shall notify each generator identified in Section 2.8 of Attachment 2 of this Permit within thirty (30) days of the effective date of this Permit, or prior to receipt of hazardous waste from such an off-site source, whichever is sooner, of the hazardous wastes it is permitted to receive and store.

The Permittee shall renotify each generator within one (1) week after any permit modification to the hazardous waste codes which the Permittee is permitted to receive and store.

II.B.2. The Permittee is prohibited from receiving hazardous waste from a foreign source except during a maritime emergency involving a vessel under a foreign flag.

**II.C. GENERAL WASTE ANALYSIS**

The Permittee shall comply with the Waste Analysis provisions of 40 C.F.R. § 264.13 and shall implement the procedures of the Waste Analysis Plan, Attachment 2 of this Permit.

**II.D. SECURITY**

The Permittee shall comply with the security provisions of 40 C.F.R. § 264.14 and shall implement the Security Plan, Attachment 6 of this Permit.

**II.E. GENERAL INSPECTION REQUIREMENTS**

The Permittee shall comply with the inspection provisions of 40 C.F.R. § 264.15 and shall implement the inspection plan in Attachment 6 of this Permit.

**II.F. TRAINING FOR PERSONNEL INVOLVED WITH HAZARDOUS WASTE MANAGEMENT ACTIVITIES**

The Permittee shall comply with the personnel training provisions of 40 C.F.R. § 264.16 and shall implement the training program outlined in Attachment 3 of this Permit.

**II.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES**

The Permittee shall comply with the requirements of 40 C.F.R. § 264.17 and shall implement the procedures for ignitable, reactive or incompatible wastes in Section 4.1, Waste Analysis Plan, Attachment 2 of this Permit; Section 5.0, Procedures to Prevent Hazards, Attachment 6 of this Permit; and Section 5.8 of the facility Contingency Plan, maintained at the facility.

**II.H. LOCATION STANDARDS**

The Permittee shall comply with the location standards of 40 C.F.R. § 264.18.

**II.I. PREPAREDNESS AND PREVENTION**

The Permittee shall comply with the preparedness and prevention provisions of 40 C.F.R. 264 §§ 31 through 37 and as outlined in Attachments 4B and 7 of this Permit.

**II.J. CONTINGENCY PLAN**

The Permittee shall comply with the contingency planning requirements of 40 C.F.R. 264 §§ 50 - 56, and shall implement the Contingency Plan, maintained at the facility in accordance with 40 C.F.R. § 264.52(b).

**II.K. MANIFEST SYSTEM**

The Permittee shall comply with the manifest requirements for the use of a manifest system, manifest discrepancies, and un-manifested waste reporting, in accordance with 40 C.F.R. §§ 264.71, 264.72, and 264.76.

**II.L. RECORD KEEPING AND REPORTING**

In addition to the record keeping and reporting requirements specified elsewhere in this Permit, the Permittee shall maintain a written operating record at the facility in accordance with 40 C.F.R. § 264.73. The Permittee is exempt from 40 C.F.R. § 264.73(b)(8) for closure cost estimates, in accordance with 40 C.F.R. § 264.140.

**II.M. CLOSURE AND POST-CLOSURE**

**II.M.1. Performance Standard:**

The Permittee shall close the storage unit, as required by 40 C.F.R. § 264.111 and in accordance with the Closure Plan, Attachment 4B of this Permit.

**II.M.2. Amendment to Closure Plan:**

The Permittee shall modify the Closure Plan in writing, in accordance with 40 C.F.R. § 264.112(c), whenever new information would more accurately characterize the manner in which the Permittee intends to close the hazardous waste storage unit. The Administrator may determine that cause exists to modify the Closure Plan at any time, in accordance with 40 C.F.R. § 270.41.

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II.M.3. Notification of Closure:

The Permittee shall notify the Administrator in writing at least forty-five (45) days prior to the date on which the Permittee expects to begin closure as required by 40 C.F.R. § 264.112(d).

II.M.4. Time Allowed For Closure:

After receiving the final volume of hazardous waste, the Permittee shall remove from storage all hazardous waste and shall complete closure activities, in accordance with 40 C.F.R. § 264.113; and the Closure Plan, Attachment 4B of this Permit.

II.M.5. Disposal or Decontamination of Equipment, Structures, and Soils:

The Permittee shall decontaminate and/or remove and dispose of all contaminated equipment, structures, and soils, as required by 40 C.F.R. § 264.114, 40 C.F.R. § 264.178, and the Closure Plan, Attachment 4B of this Permit.

II.M.6. Certification of Closure:

The Permittee shall certify that the hazardous waste storage unit has been closed, in accordance with the specification in the Closure Plan, as required by 40 C.F.R. § 264.115 and 40 C.F.R. § 264.77(b).

II.N. **POLLUTION PREVENTION PROGRAM**

The Permittee shall comply with the pollution prevention requirements of 40 C.F.R. § 264.73(b)(9).

II.O. **EQUIVALENT MATERIALS**

Except as required in Permit Condition I.M.4 of this Permit, if certain equipment, materials, procedures, and/or administrative information (such as names, telephone numbers, or addresses) are specified in this Permit, the Permittee is allowed to use an equivalent or superior item. Use of such equivalent or superior items shall not be considered a modification of the permit, but the Permittee shall place a notation of such a revision in the operating record, accompanied by a narrative explanation and the date the revision became effective.

The Administrator may judge the soundness of the revision during inspections of the facility and may require the Permittee to reinstate the equipment, materials, procedures, or administrative information specified in the permit. The format of tables, forms and figures are not subject to the requirements of this Permit and may be revised according to the Permittee's discretion.

**II.P.                    ORGANIC AIR EMISSION REQUIREMENTS**

II.P.1.     On December 6, 1994, EPA published the final rule for Phase II Organic Air Emissions Standards (40 C.F.R. Parts 264 and 265, Subpart CC) for hazardous waste treatment, storage, and disposal facilities, including certain hazardous waste generators accumulating waste on-site in RCRA permit-exempt (90-day) tanks and containers.

In general, under these standards air emissions controls must be used for tanks, surface impoundments, containers and miscellaneous units which contact hazardous waste containing an average organic concentration greater than 500 parts per million by weight (ppmw) at the point of origination determined by the procedures outlined in 40 C.F.R. §264.1083(a), except as specifically exempted under 40 C.F.R. §264.1080 and § 264.1082.

II.P.2.     Prior to installing or using any additional equipment subject to the requirements of 40 C.F.R. Part 264 Subpart CC, the Permittee shall apply for a permit modification under 40 C.F.R. §270.42 and provide specific Part B information required pursuant to 40 C.F.R. § 270.27, as applicable, with the modification request.

II.P.3.     The Permittee shall control air emissions from the Hazardous Waste Container Storage Unit in accordance with provisions of 40 C.F.R. §264.1082 and 40 C.F.R. § 264.1086.

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**PART III - STORAGE IN CONTAINERS**

**III.A. WASTE IDENTIFICATION**

III.A.1. The Permittee may store the following RCRA hazardous wastes in containers at Base Kodiak, subject to the terms of this Permit:

Location: Building N-48.

Description: [See Attachment 1]

Batteries: lithium, nickel-cadmium, zinc-air primary  
Paint slops and waste paints, coatings and thinners  
Chlorinated and non-chlorinated solvents

Emergency Escape Breathing Device (EEBD) cartridges  
Waste fuel and waste oil, and solids contaminated with these materials

Solids and liquids from spill cleanups

Wastes from historical operations at Base Kodiak  
Discarded commercial chemical products identified in Part A

Permitted RCRA Waste Codes:

See Part A Application, Attachment 1 of this Permit.

III.A.2. The Permittee may store other discarded commercial chemical products, off-specification species, container residues, and spill residues, as listed in 40 C.F.R. § 261.33 that are not identified in Permit Condition III.A.1, upon satisfying the Permit modification request procedure and receiving approval from the Administrator, as set forth in 40 C.F.R. § 270.42.

The storage of different wastes in containers that require additional or different management practices from those authorized in the Permit shall be considered a Class 3 modification.

The storage of different wastes in containers that do not require additional or different management practices from those authorized in the Permit shall be considered a Class 2 modification.

III.A.3. The Permittee shall manage newly listed or identified wastes in accordance with 40 C.F.R. § 270.42(g).

**III.B. CONDITION OF CONTAINERS**

III.B.1. If a container holding hazardous waste is not in good condition (e.g. corrosion, apparent structural defects, creases or dents), or if it begins to leak, the Permittee shall transfer the hazardous waste to a container that is in good condition or manage the waste in some other way that complies with the requirements of 40 C.F.R. Part 264.

III.B.2. The Permittee shall maintain at all times a sufficient number of empty containers, overpack drums, and drip pans at the hazardous waste storage units to comply with Permit Condition III.B.1.

The number of containers are specified in Attachment 5 of this Permit.

**III.C. COMPATIBILITY OF WASTE WITH CONTAINERS**

The Permittee must 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, as required in 40 C.F.R. § 264.172.

**III.D. MANAGEMENT OF CONTAINERS**

III.D.1. The Permittee shall always have containers holding hazardous waste closed during storage, except when it is necessary to add or remove waste, as required in 40 C.F.R. § 264.173(a).

III.D.2. The Permittee shall not open, handle, or store hazardous waste in a manner which may rupture a container or cause it to leak, as required in 40 C.F.R. § 264.173(b).

III.D.3. At any time, the Permittee may store a maximum volume of 256 55-gallon (or other sized) drums, or their volumetric equivalent (in gallons) in other sized containers, at the Container Storage Unit identified in Permit Condition III.A.1. This requirement applies regardless of whether the containers hold hazardous waste, non-hazardous waste, or are empty.

**III.E.                    INSPECTION OF CONTAINERS AND CONTAINMENT SYSTEM**

- III.E.1. The Permittee shall inspect, at least once every seven (7) days, areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, temperature, and/or other factors, as required in 40 C.F.R. § 264.174.
- III.E.2. The Permittee shall document the inspections by maintaining the Inspection Log, as required by 40 C.F.R. § 264.15 and described in Attachment 6 of this Permit.
- III.E.3. The Permittee shall inspect each container for its integrity prior to handling or moving, as required in 40 C.F.R. § 264.31.

**III.F.                    CONTAINMENT**

- III.F.1. The Permittee shall maintain and operate the container storage containment system, as designed and described in the attached plans and specifications, Attachment 5 of this Permit, as required in 40 C.F.R. § 264.175.
- III.F.2. The Permittee shall operate and maintain the containment system such that the base underlying the containers is free of cracks or gaps and is sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed, as required in 40 C.F.R. § 264.175(b).
- III.F.3. The containment system must have sufficient capacity to contain 10 percent (10%) of the storage capacity of the facility (14,080 gallons) or the capacity of the largest container, whichever is greater, as required in 40 C.F.R. § 264.175(b)(3).
- III.F.4. The Permittee shall remove spilled or leaked waste and accumulated precipitation from the sump or collection area in a manner as is necessary to prevent overflow of the collection system and in a manner to keep the containers from contact with the liquids/material in the collection area. The Permittee shall manage the collected material, in accordance with 40 C.F.R. § 264.175(b)(5). If the collected material is a hazardous waste under 40 C.F.R. Part 261, it must be managed in accordance with all applicable requirements of 40 C.F.R. Parts 262 through 266.

**III.G.                    SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE**

- III.G.1. The Permittee shall separate containers of incompatible wastes, as required by 40 C.F.R. § 264.177 and as described in Section 4.1 of the Waste Analysis Plan, Attachment 2 of this Permit; Section 5.0 of Procedures to Prevent Hazards, Attachment 6 of this Permit; and Section 5.8 of the facility Contingency Plan, maintained at the facility.
- III.G.2. Notwithstanding Permit Condition III.G.1, the Permittee shall not place incompatible wastes or incompatible wastes and materials in the same container, nor place hazardous waste in an unwashed container that previously held an incompatible waste or material, as required in 40 C.F.R. § 264.177.
- III.G.3. Notwithstanding Permit Condition III.G.1, the Permittee shall separate, or otherwise protect any storage container holding hazardous waste from any incompatible wastes or materials by means of a dike, berm, wall, or other appropriate device, such as an overpack drum, salvage drum, or drip pan, as required in 40 C.F.R. § 264.177.
- III.G.4. Notwithstanding Permit Conditions III.A, the Permittee shall not place incompatible wastes, or incompatible wastes and materials in the same bay, unless the Permittee complies with 40 C.F.R. § 264.17(a)-(c) and Permit Conditions II.G.

**III.H.                    PROHIBITIONS OF STORAGE OF RESTRICTED WASTES**

- III.H.1. The Permittee is prohibited from receiving or storing hazardous wastes restricted from land disposal, unless the conditions required in 40 C.F.R. § 268.50 are met.
- III.H.2. The Permittee shall store land disposal restriction (LDR) hazardous waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment, or disposal and each container shall be clearly marked to identify its contents and the date each period of accumulation begins, as required by 40 C.F.R. § 268.50(a)(2).

The Permittee shall not store hazardous waste to circumvent or forestall the treatment requirements of 40 C.F.R. Part 268.

- III.H.3. The Permittee shall store LDR wastes for no more than three hundred sixty-five (365) days, unless the Permittee can demonstrate to the satisfaction of the Administrator that such storage is/was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal, as required in 40 C.F.R. § 268.50(b)&(c).

The Permittee shall provide a written demonstration if the waste has been stored for greater than three-hundred sixty-five (365) days and in accordance with Permit Condition III.H.2.

This three-hundred sixty-five (365) day limitation does not apply to wastes subject to an approved petition, a nationwide variance, or an approved extension, nor to a waste that meets the treatment standard.

- III.H.4. The Permittee shall not dilute a land disposal restricted waste, in any manner, in accordance with 40 C.F.R. § 268.3.

- III.H.5. The Permittee shall receive from the generator all necessary notices, notifications, and certifications that are required to determine if a waste is restricted from land disposal, in accordance with 40 C.F.R. § 268.7.

- III.H.6. The Permittee shall comply with the notice, notification, and certification requirements under 40 C.F.R. § 268.7 when sending waste or treatment residue off-site, in accordance with 40 C.F.R. § 268.7(b)(6).

- III.H.7. The Permittee shall keep all copies of each applicable generator's demonstration and certification in the Permittee's operating record when the waste received is subject to a valid certification in accordance with 40 C.F.R. § 264.73(b).

- III.H.8. It is the duty of the Permittee to request a modification of this Permit in the event that the Permittee believes any permit condition in Permit Condition III.H prevents the ability of the Permittee to comply with 40 C.F.R. Part 268, in accordance with 40 C.F.R. § 270.4(a), and 40 C.F.R. § 270.41(a).

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**PART IV - POST-CLOSURE**

- IV.A.** The permittee shall comply with requirements in 40 C.F.R. §§ 264.228(b), and 264.117 through 264.120 by performing activities included in the Post-Closure Plan, Attachment 4A of this Permit.
- IV.B.** The period of post-closure care for the regulated units, Sites 3, 6A and 7A, shall be a minimum of thirty (30) years. The post-closure care period extends thirty (30) years from the effective date of this Permit. The Agency will extend the post-closure care period, if necessary, to protect human health or the environment
- IV.C.** Use of the closed regulated units, located as designated on Figure 1 of this permit, shall not disturb the long-term integrity of the cover or any other components of the containment system, or the function of the facility's monitoring systems, unless the administrator finds that the disturbance:
- IV.C.1. Is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or,
- IV.C.2. Is necessary to reduce a threat to human health or the environment.
- IV.D.** No later than sixty (60) days after completion of the established post-closure care period, the permittee shall submit to the administrator, by email, electronic file transfer, or certified mail, a certification that the post-closure care was performed in accordance with the specifications in the approved post-closure care plan. The certification must be signed by the permittee and an independent registered professional engineer.

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**PART V - CORRECTIVE ACTION FOR CONTAMINATED GROUNDWATER**

**V.A. CORRECTIVE ACTION PROGRAM**

V.A.1. The Permittee shall establish, operate and maintain a corrective action program to remediate groundwater contaminated as a result of releases from Sites 3 and 7A, in accordance with Permit Conditions V.A through V.F and as specified in Attachment 4A of this Permit.

The corrective action program shall consist of an asphalt cap and long-term monitoring of groundwater. An AS/SVE and treatment systems are not operated as part of the corrective action but are kept in a state of readiness to be reactivated if increasing contaminant concentration trends are observed in groundwater.

V.A.2. The Permittee may implement corrective measures in addition to those specified in Attachment 4A of this Permit to facilitate corrective action provided that compliance with the performance standards in Permit Condition V.F.1 are maintained and that the Agency has been notified and given opportunity for comment on and approval of the additional measures prior to implementation. If the Agency comments on the additional measures, the Permittee shall revise the measures to address those comments.

Implementation of additional corrective measures shall not be considered a modification of this Permit, and is subject to the dispute resolution procedures in Permit Condition V.N.

The Permittee shall place a notation of such additional corrective measures, accompanied by a narrative explanation and a copy of the Agency's comments on the measures, in the operating record.

**V.B. AIR SPARGING/VAPOR EXTRACTION SYSTEM**

The Permittee shall maintain the AS/SVE systems at Sites 3 and 7A as described in Attachment 4A. Though these systems are not operating as part of the Corrective Action, they are maintained operational in a readiness state. If long-term monitoring exhibits an increasing trend in contaminant concentrations in groundwater, the

systems shall be operated to achieve the performance standards in Permit Condition VI.F.

During operational periods, data shall be collected to demonstrate compliance with Permit Condition V.F.1 and as specified by Permit Condition VI.E.

- V.B.1. If EPA determines that reactivation of the AS/SVE systems is appropriate, except as provided by Permit Condition V.B.2, operation of the AS/SVE systems and treatment of groundwater shall operate seasonally, from July through September, on pulsed cycles until the Permittee can demonstrate that it is in compliance with the requirements of Permit Condition VI.E.4 of this Permit.

For the purpose of this Permit Condition, the term "operation" shall include seasonal pulsing of the extraction system.

A three (3) day readiness demonstration, consisting of successfully operating the extraction and treatment system, shall be conducted by the Permittee on an annual basis. The readiness demonstration shall not be conducted within seven (7) days of any groundwater sampling event.

- V.B.2. The AS/SVE and/or treatment systems may be shut down for prearranged maintenance and repair, and for emergencies, or as approved by EPA in accordance with Permit Conditions V.O through V.R. The Permittee shall notify the Administrator if the systems are shut down for more than seven (7) days.

The Permittee shall provide, in the operating record and the next quarterly report, information including the repairs made and the reasons for those repairs.

- V.B.3. Minor deviations from the designs or specifications in Attachment 4A of this Permit deemed necessary by the Permittee to facilitate proper operation of the AS/SVE and treatment systems shall not be considered a modification of this Permit.

The Permittee shall place a notation of such a deviation, accompanied by a narrative explanation, in the operating record, and shall notify EPA in the next Quarterly Progress Report. The Administrator may judge the soundness of this determination during inspections of

the facility and may determine that the change was inappropriate and require compliance with designs or specifications in Attachment 4A of this Permit. Such a determination is subject to the dispute resolution procedures in Permit Condition V.N.

**V.C.                    TREATMENT SYSTEM**

V.C.1.            If EPA determines that reactivation of either AS/SVE system is appropriate, the Permittee shall conduct vapor treatment as specified by Attachment 4A.

The Permittee may implement modifications to these designs and specifications to ensure adequate capacity and flexibility to treat the effluent from the AS/SVE system specified in Permit Condition V.B. Such modifications shall be subject to the equivalent materials procedure specified in Permit Condition II.O.

V.C.2.            All contaminated groundwater from the monitoring wells which exceeds the levels specified in Table 4 of this Permit shall be managed as a hazardous waste. Constituents removed from the groundwater shall be managed in accordance with 40 C.F.R. Part 262 after removal from the treatment system.

Disposal of contaminated groundwater shall conform to all applicable local, State, and Federal regulatory requirements.

**V.D.                    MONITORING AND MAINTENANCE**

V.D.1.            The Permittee shall maintain the asphalt cap, well network, and AS/SVE and treatment system operations (in a readiness state), making timely repairs so that the groundwater corrective action program is not hindered or delayed. The Permittee shall maintain an adequate supply of replacement parts and repair equipment to ensure compliance with Permit Conditions V.F.1.a, V.F.1.b, and V.B.2.

V.D.2.            The Permittee shall follow the procedures in Attachment 4A of this Permit for routine inspection of the AS/SVE and treatment systems.

V.D.2.a.            If a monitoring or AS/SVE well must be decommissioned and replaced for any reason during the term of this Permit, it shall be replaced within

sixty (60) days of the date of being taken out of service.

The Permittee may request that the well be replaced within ninety (90) days during inclement or severe winter weather.

Prior to decommissioning, the Permittee shall apprise the Administrator of the rationale for the decision.

V.D.2.b. Construction of any new or replacement monitoring or AS/SVE well shall be performed as specified by condition VI.C of this Permit.

The replacement well shall be installed as close as practicable to the well being replaced. The Permittee shall provide information regarding the new well in the operating record and to the Agency as specified by Permit Conditions VI.C.4 and VI.C.5.

V.D.2.c. The Permittee shall close each well being replaced no later than ninety (90) days after installation of the replacement well.

Wells shall be decommissioned in accordance with the "Well Decommissioning Plan," Attachment 9 of this Permit.

V.D.3.a. The Permittee shall conduct all sampling and analysis required by this Permit in accordance with procedures specified in Attachment 4A, Appendices A and B, of this Permit.

V.D.3.b. The Permittee shall respond to EPA comments, dated January 27, 2021, on Attachment 4A, Appendix B of this Permit, the Quality Assurance Project Plan (QAPP), and submit a revised QAPP which addresses the EPA comments, within one-hundred eighty (180) days of the effective date of this Permit.

**V.E. QUARTERLY REPORTS**

V.E.1. During operation of the groundwater corrective action elements, the Permittee shall submit Quarterly Reports to the Agency. Based upon information contained in the Quarterly Reports, the Agency may direct the Permittee

to take appropriate actions. These actions may include modifications to the corrective action elements if the Agency determines that the corrective action is not achieving adequate progress toward meeting the Groundwater Protection Standards as defined in Permit Condition V.F.1.

The Quarterly Reports shall at a minimum include:

- V.E.1.a. A discussion and summary of all groundwater corrective-measures-related activities undertaken during the time period at hazardous waste management units during the post-closure period;
- V.E.1.b. Reports of the results of all sampling and monitoring completed pursuant to this Permit; and,
- V.E.1.c. A discussion, based on activities and sampling results described in V.E.1.a and V.E.1.b above, of changes in: the locations and levels of contamination at the post-closure units; identified migration pathways (or potential pathways); and impacts (or potential impacts) on human health and the environment since the last reporting period; and
- V.E.1.d. Any recommendations for changes to the corrective action elements, based upon the semi-annual evaluation of the system's effectiveness in achieving adequate progress toward meeting the Groundwater Protection Standards as defined in Permit Condition V.F.1.
- V.E.2. The Quarterly Reports which fall on the quarters identified in Permit Condition V.F.1 shall also contain the semi-annual demonstrations required by Permit Condition V.F.1, the calculations and contour maps showing the rate and direction of groundwater flow in the aquifer system underlying the post-closure units required by Permit Condition VI.D.1, and the progress reports required by Permit Condition IX.B.
- V.E.3. The Quarterly Report following the October sampling event shall also include the results of triennial analyses on selected groundwater samples for all 40 C.F.R. Part 264 Appendix IX constituents as specified in

Permit Condition VI.D.4. These constituents are presented in Attachment 4A, Appendix B.

**V.F. SEMI-ANNUAL REPORTS**

V.F.1. In the next April or October quarterly report (whichever comes first) after the effective date of this Permit, and every six (6) months thereafter, according to the schedule in Table 3, the Permittee shall submit to the Agency a report demonstrating the effectiveness of the corrective action program. Effective performance shall be demonstrated by meeting the following performance standards:

V.F.1.a. A demonstration that monitoring wells specified in Tables 3(a) and 3(b), located as designated on Figures 2, 3 and 4 of this Permit, continue to be in compliance with the Groundwater Protection Standards specified in Table 4 of this Permit.

V.F.1.b. A groundwater contaminant concentration trend analysis as specified in Attachment 4A of this Permit.

V.F.1.c. If an AS/SVE system is reactivated, a demonstration that the AS/SVE is removing contaminants, through measurement of volatile organic compound (VOC) mass removal as specified in Attachment 4A of this Permit.

V.F.2. If the Permittee cannot demonstrate that the performance standards specified in Permit Condition V.F.1 are being met, the Permittee shall submit to the Administrator a plan for modification of the groundwater corrective action program to more effectively meet these standards, and a schedule for implementing this plan.

This modification plan and implementation schedule shall be submitted within ninety (90) days of the date of submission of the semi-annual report which fails to demonstrate effective performance pursuant to Permit Condition V.F.1 or within ninety (90) days of the Permittee's receipt of a written request from the Administrator, whichever comes first.

V.F.3. [Note: The performance standards specified in Permit Condition V.F.1 have been established based on the

monitoring and investigations performed prior to issuance of this Permit.]

If it is judged by the Administrator, or the Permittee, based on the semi-annual demonstrations submitted pursuant to Permit Condition V.F.1 and/or the groundwater monitoring data submitted pursuant to Part VI of this Permit, that the performance standards specified in Permit Condition V.F.1 are not appropriate criteria for determining the effectiveness of the groundwater corrective action program, the Administrator, or the Permittee, may propose modification of these standards.

If the Permittee proposes modification to the performance standards, then the Permittee shall follow procedures specified in 40 C.F.R. § 270.42.

**V.G.                    CLOSURE OF CORRECTIVE ACTION SYSTEMS**

V.G.1.            The corrective action elements shall be maintained in operational readiness at least until the end of the three (3) year demonstration period cited in Permit Condition VI.E.4.

V.G.2.            The Permittee shall submit to the Administrator a closure plan for the corrective action elements within thirty (30) days of the time when all wells are clean in accordance with Permit Condition VI.E.4. This plan shall include detailed procedures and a schedule for the disposal or decontamination of all elements of these systems.

**V.H.                    ACCESS**

To the extent that work required by this Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain site access agreements from the owner(s) of such property within thirty (30) days of the date that the need for access became known to the Permittee, or of approval of any Work Plan for which site access is required, whichever is earlier.

For the purposes of this Permit Condition, the term "best efforts" shall mean, at a minimum, a certified letter from the Permittee to the property owner(s) requesting

access to such property and, if a reply is received from the property owner, follow-up letters from the Permittee, as appropriate, to clarify the work contemplated and address the owner's reasonable concerns.

In the event that the Permittee cannot obtain the necessary access agreements, the Permittee shall notify the Administrator in writing within ten (10) days thereafter regarding both the efforts undertaken to obtain access and the failure to obtain such agreements.

The Administrator may, consistent with his/her legal authority, assist the Permittee in obtaining such agreements.

**V.I. OTHER PERMITS AND APPROVALS**

To the extent that the work required by this Permit must be done under permits or approvals pursuant to other federal, state, or local regulatory authorities, the Permittee shall use its best efforts to obtain such permits.

For the purposes of this Permit Condition, the term "best efforts" shall mean submittal of a complete and timely application for the permits or approvals.

**V.J. SCHEDULE EXTENSIONS**

To the extent that the activities required by Part V of this Permit are not completed in accordance with the schedules contained therein, and the Permittee can demonstrate to the Agency's satisfaction that the Permittee used its best efforts to accomplish the activity within the required schedule, the Administrator may grant the Permittee an extension to the applicable schedule.

For the purposes of this Permit Condition, successful demonstration of "best efforts" shall be achieved by meeting the following conditions: performance of all activities necessary to award contracts to outside contractors sufficiently in advance to comply with any aspect of this Permit; adequate planning, funding, operator staffing, laboratory and process controls; and operation of backup or auxiliary facility or similar

systems by the Permittee when necessary to meet the required schedules.

The Permittee shall notify the Administrator in writing no later than fifteen (15) days after the Permittee determines that such schedules will not be met. This notification must occur in advance of the scheduled deadline. The Permittee shall include with such notification all information supporting its claim that it has used best efforts to meet the required schedules and minimize delay.

If the Administrator determines that the Permittee has made best efforts to meet such schedules, the Administrator shall notify the Permittee in writing that the Permittee has been granted an extension and provide the Permittee with a revised schedule reflecting this extension. Such revisions to schedules shall not require a permit modification.

Copies of all correspondence pursuant to this Permit Condition shall be kept in the facility operating record.

**V.K.                    CHANGES IN CORRECTIVE ACTIONS**

Within one hundred twenty (120) days of a written request by the Agency, the Permittee shall submit a written proposal for a permit modification to alter any interim measures or long-term corrective action elements, based on analytical results and data evaluation obtained pursuant to this Permit.

**V.L.                    AGENCY APPROVAL OF SUBMITTALS**

With the exception of Quarterly Reports and as otherwise specified in this Permit, the Agency will review all submittals required by this Permit, and will provide written approval where approval is required, or disapproval with comments and/or modifications to be made by the Permittee. The Agency may also modify any Submittal and approve it as modified.

If the Agency provides comments or modifications to the Permittee on any Submittal, all comments or modifications must be incorporated into a revised

Submittal to the Agency within thirty (30) days of receipt of Agency comments or modifications.

Agency comments or modifications are subject to the dispute resolution provisions of Permit Condition V.N.

**V.M. INCORPORATION OF DOCUMENTS INTO PERMIT**

All plans, reports, and schedules, required by the terms of this Permit and where work is required, are, upon approval by the Agency where approval is required, incorporated into this Permit as fully enforceable permit conditions.

Any noncompliance with such approved plans, reports, and schedules shall be deemed noncompliance with this Permit.

In the event of conflict between any permit condition and any provisions in the approved plans, reports and schedules submitted in compliance with the terms of this Permit, the permit condition shall prevail.

**V.N. DISPUTE RESOLUTION**

V.N.1. In the event the Administrator rejects or modifies, in whole or in part, any submission required by this Permit where dispute resolution procedures are expressly identified as applicable, the following procedures shall apply:

V.N.1.a. The Permittee will be notified in writing (the Notice) of either a rejection with comments of a submission or modification of a submission. To the extent appropriate, such Notice will:

- i. Identify problems with the submission and any modifications to be made;
- ii. Provide an explanation and documentation or data to support the complete or partial rejection of, and any modification to, the submission;
- iii. Identify a date by which either objections to the Notice or a document revised in accordance with comments that includes any required modifications must be received from the Permittee. Such date

shall not be less than thirty (30) days from the date the Permittee receives the Notice under Permit Condition V.N.1.a.

V.N.1.b. If the Permittee submits objections to the Notice, the Permittee and the Agency staff person(s) responsible for reviewing the submission (the "permitting staff") will attempt to resolve any disputes over the submission informally. If requested by the Permittee, a meeting will take place between the permitting staff and the Permittee to discuss the submission. Unless otherwise agreed to by the permitting staff, the meeting will be held at EPA Region 10's office in Seattle, Washington.

V.N.1.c. If agreement is not reached between the Permittee and the permitting staff within fourteen (14) days of the date the permitting staff receives the Permittee's objections to the Notice (the "informal dispute resolution period"), the Permittee must submit either written arguments and evidence to the Agency official authorized to make final permit decisions (the Decision Maker) or a document revised in accordance with comments that includes any required modifications. The written arguments and evidence or revised document shall be submitted to the Decision Maker within thirty (30) days of the end of the informal dispute resolution period.

V.N.1.d. If written arguments and evidence are submitted by the Permittee to the Decision Maker, the Decision Maker will promptly resolve the dispute. The Decision Maker's resolution of the dispute will include a written response to the evidence and arguments submitted by the Permittee.

The Permittee shall comply with the Decision Maker's decision regardless of whether the Permittee agrees with the decision. The Decision Maker's resolution of the dispute is not subject to administrative or judicial appeal.

V.N.2. Unless otherwise agreed to by the Administrator, the invocation of dispute resolution by the Permittee shall not extend, postpone or affect in any way any obligation

of the Permittee under this Permit not directly in dispute.

**V.O. SUPPLEMENTAL RFI/CMS FOR REVISED CORRECTIVE ACTION AT SITE 3**

V.O.1. The Permittee shall submit to EPA a Work Plan and schedule for implementation of a Supplemental RCRA Facility Investigation and Corrective Measures Study (RFI/CMS) for Site 3.

The Work Plan shall be developed in accordance with Permit Condition IX.E below. This Work Plan shall also address EPA's comments, dated February 27, 2020, on the Coast Guard's Site 3 Draft Pilot Treatment Study Report.

V.O.2. After the Permittee has received written approval from the Administrator for the Supplemental RFI/CMS Work Plan for Site 3, the Permittee shall begin implementation of the Supplemental RFI/CMS according to the schedules specified in the approved Work Plan.

Pursuant to Permit Condition IX.A.4, the RFI/CMS shall be conducted in accordance with the approved RFI/CMS Work Plan.

V.O.3. After the completion of the Supplemental RFI/CMS and receipt of validated data, the Permittee shall submit a Supplemental RFI/CMS Report to the Administrator.

The Supplemental RFI/CMS Report shall describe the procedures, methods, and results of all facility investigations of Site 3 and the associated releases, including information on the type and extent of contamination at Site 3, sources and migration pathways, and actual or potential receptors. Additionally, the Supplemental RFI/CMS Report shall include an evaluation of each remedial alternative, and a proposal for corrective measures implementation.

The Supplemental RFI/CMS Report shall present all information to support further corrective action decisions at Site 3 and to support the Administrator in the remedy selection decision making process, described under Permit Condition V.R of the permit. The Supplemental RFI/CMS Report shall be consistent with EPA guidance and Attachment 8 of this Permit.

V.O.4. Based on the results and conclusions of the Supplemental RFI/CMS, the Administrator may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies and modify the RFI/CMS Report accordingly, within a timeframe specified by the Agency. Modifications to the RFI/CMS Report are subject to the dispute resolution procedures of Permit Condition V.N.

**V.P. INTERIM MEASURES AT SITE 3**

The Permittee shall conduct interim corrective measures at Site 3 if the Administrator determines that a release or potential release of hazardous waste or hazardous constituents from Site 3 pose a threat to human health and the environment. Such interim corrective measures shall follow the requirements of Permit Condition IX.G.

**V.Q. REVISED REMEDY SELECTION FOR SITE 3**

Based on the results of the Supplemental RFI/CMS Report and any further evaluations of additional remedies under this study, the Administrator may select a remedy from the remedial alternatives evaluated in the RFI/CMS that will:

- (1) be protective of human health and the environment;
- (2) meet the concentration levels of hazardous constituents in each medium that the remedy must achieve to be protective of human health and the environment;
- (3) control the source(s) of release(s) so as to reduce or eliminate, to the maximum extent practicable, further releases that might pose a threat to human health and the environment; and
- (4) meet all applicable waste management requirements.

**V.R. PERMIT MODIFICATION FOR REVISED REMEDY AT SITE 3**

V.R.1. Based on information the Permittee submits in the Supplemental RFI/CMS Final Report and other information, the Administrator may select a remedy and initiate a permit modification to this Permit, pursuant to 40 C.F.R. § 270.41. This modification will also revise Attachment 4A of the Permit to incorporate additional EPA-approved corrective measures, and revise Tables 1,

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2, and 3 and Figures 2 and 3 of the Permit to incorporate the EPA-approved revised monitoring program for Site 3 into the Permit.

**PART VI - CORRECTIVE ACTION FOR CONTAMINATED GROUNDWATER**

**VI.A. IMPLEMENTATION OF GROUNDWATER MONITORING PROGRAM**

The Permittee shall implement a corrective action groundwater monitoring program for Sites 3 and 7A in accordance with Permit Conditions VI.B through VI.E. The Permittee shall commence this corrective action groundwater monitoring program within ninety (90) days of the effective date of this Permit.

**VI.B. DESIGNATION OF MONITORING LOCATIONS**

The Permittee shall include all monitoring wells specified in Table 1 of this Permit and located as designated on Figures 2 and 3 of this Permit in the corrective action monitoring program, except as provided in Permit Condition VI.B.1 below.

**VI.B.1. Monitoring Locations for Site 3**

The Permittee shall include all monitoring wells specified in Table 1 of this Permit and located as designated on Figure 2 of this Permit in the corrective action monitoring program for Site 3 until EPA determines that the requirements of Permit Conditions V.O through V.R above have been completed.

**VI.C. WELL CONSTRUCTION, MAINTENANCE, AND REPLACEMENT**

**VI.C.1.** The Permittee shall maintain all monitoring wells in good working order, making necessary repairs in a timely manner so that the sampling program is not hindered or delayed.

The Permittee shall maintain an adequate supply of replacement parts and repair equipment to ensure that each sampling event proceeds on schedule.

**VI.C.2.** The Permittee shall follow the procedures in the Post-Closure Care Plan, Attachment 4A of this Permit, for routine inspection of the monitoring wells. Visual evidence of damage to or deterioration of wells, and complete records of all well maintenance activities, must be noted in the operating record.

- VI.C.2.a. The Permittee shall maintain borehole integrity of each monitoring well included in the corrective action monitoring program, as required by 40 C.F.R. §264.97(c), using the method designated in Permit Conditions VI.C.2.b.
- VI.C.2.b. The monitoring wells shall be sounded on an annual basis. If a monitoring well exhibits buildup of one (1.0) foot or more of sediment at the bottom, the monitoring well shall be redeveloped and the sediment removed. Wells designated as "Gauge Only" in Attachment 4A may be redeveloped if sediment buildup is suspected to cover the screened interval.
- VI.C.3. If a monitoring well must be decommissioned and replaced for any reason during the term of this Permit, it shall be replaced prior to the next scheduled sampling event.
- The Permittee may request that the well be replaced within ninety (90) days of determination of the need for replacement during inclement or severe winter weather.
- Prior to decommissioning, the Permittee shall apprise the Administrator of the rationale for the decision.
- The replacement well shall be installed as close as practicable to the well being replaced. The Permittee shall provide information regarding the new well in the operating record and to the Administrator as specified by Permit Conditions VI.C.4 and VI.C.5.
- The Permittee shall close each well being replaced no later than ninety (90) days after installation of the replacement well. Wells shall be decommissioned in accordance with the "Well Decommissioning Plan," Attachment 9 of this Permit.
- VI.C.4. Inspection of drilling and well construction of any new or replacement monitoring well shall be performed by a qualified geologist or geological engineer. The qualified professional shall construct and maintain a detailed log of each well describing the geologic strata encountered during drilling. The logs and descriptions shall include:
- (1) Date and time of construction;
  - (2) Drilling method and any fluid used;

- (3) Well location (surveyed to within 0.5 feet);
- (4) Borehole diameter and well casing diameter;
- (5) Well depth (to within 0.1 feet);
- (6) Drilling logs and lithologic logs, including a description of soil or rock types, color, petrology, weathering, texture, structure, and fractures;
- (7) Casing materials;
- (8) Screen material and design, including screen length and slot size;
- (9) Casing and screen joint type;
- (10) Filter pack material, including size and placement method and approximate volume;
- (11) Composition and approximate volume of sealant material and method of placement;
- (12) Surface seal design and construction;
- (13) Well development procedures;
- (14) Ground surface elevation (to within 0.01 feet);
- (15) Top of casing elevation (to within 0.01 feet); and,
- (16) Detailed drawing of well, including dimensions.

VI.C.5. The Permittee shall submit the logs and descriptions obtained pursuant to Permit Condition VI.C.4, as-built drawings, revisions to Figures 2 and 3 of this Permit reflecting the location of the new well, and revisions to Table 1 of this Permit, if necessary due to renaming of the well, to include the new monitoring wells, to the Administrator within ninety (90) days after completion of the well. Incorporation of such revised figures and tables shall not be considered a modification of the permit.

VI.C.6. The installation of new monitoring wells shall be consistent with guidance contained in Alaska Department of Environmental Conservation's (ADEC) Monitoring Well Guidance, dated September 2013.

**VI.D.**

**PROGRAM OPERATION**

VI.D.1. The Permittee shall obtain water level elevation measurements from each monitoring well specified in Table 1 of this Permit, located as designated on Figures 2 and 3 of this Permit, at the frequencies designated in Table 1 of this Permit, in accordance with the procedures in Attachment 4A of this Permit.

Measurements for each monitoring well shall be obtained prior to purging of the well. In order to minimize the potential for error caused by temporal variations, the Permittee shall obtain all water level elevation measurements within as short a time as practicable. Barometric pressure shall be recorded for each sampling event.

The Permittee shall use these data to determine the rate and direction of groundwater flow semi-annually, for the periods of high and low water table elevation. The Permittee shall construct water table elevation contour maps semi-annually. The contour maps and flow rates shall be submitted to the Administrator in the semi-annual reports.

The Permittee shall submit, with the contour maps, a written review of the adequacy of the groundwater monitoring system relative to observed groundwater flow directions.

VI.D.2. The Permittee shall obtain water quality samples from each monitoring point specified in Table 1 of this Permit and located as designated on Figures 2 and 3 of this Permit at the frequencies designated in Table 1 of this Permit in accordance with the procedures in Attachment 4A of this Permit.

VI.D.3. Analysis and reporting of groundwater quality shall include the following:

VI.D.3.a. The Permittee shall analyze all groundwater samples obtained under Permit Condition VI.D.2 for laboratory standard list VOCs (Sites 3 and 7A) and chlorinated pesticides (Site 7A only) and shall report the detected concentrations of the parameters listed in Table 4 of this Permit, according to the schedule in Table 1 of this Permit, using procedures specified by Attachment 4A

of this Permit. Crosstab summary tables of all analytical results shall be appended to the reports, and all laboratory data shall be provided to the Administrator upon request.

VI.D.3.b. Quality assured results of these analyses, including laboratory detection limits achieved for each constituent, shall be submitted to the Administrator in the next Quarterly Report following the Permittee's receipt of results from the laboratory. In no case shall the period between the date of sampling and the date of submission of analytical results exceed one hundred twenty (120) days unless an extension is granted by the Administrator.

VI.D.4. The Permittee shall, every three (3) years (2021, 2024, etc.), during the October sampling event, analyze a groundwater sample from designated monitoring wells MW-03-013 at Site 3, and MW-7A-013 at Site 7A, for all 40 C.F.R. Part 264, Appendix IX, constituents. These constituents are presented in Attachment 4A, Appendix B.

If the designated wells have insufficient yield, the Permittee shall sample the well with the next highest contamination concentrations observed in the previous sampling event. If any Appendix IX constituents not identified in Table 4 of this Permit are detected, the Permittee shall report the concentrations of these detected constituents to the Administrator in the next Quarterly Report following the Permittee's receipt of results from the laboratory. In no case shall the period between the date of sampling and the date of submission of analytical results exceed one hundred twenty (120) days unless an extension is granted by the Administrator.

VI.D.5. For any constituent(s) detected under Permit Condition VI.D.4 that is not included in the quarterly monitoring program as described in Table 1, the Permittee shall, within forty-five (45) days of receipt of results from the laboratory:

VI.D.5.a. Add the newly detected constituent(s) to the list of monitoring constituents, and provide the Administrator with a copy of the revised list for inclusion into the permit. Such modification to the

constituent monitoring list will not require a permit modification; or

VI.D.5.b. Submit a report justifying why the detected constituent(s) should not be included in the monitoring program. If the Administrator does not accept the Permittee's justification, the Permittee shall add the constituent to the monitoring list in accordance with VI.D.5.a. If the Administrator accepts the justification, the constituent does not have to be added to the list of monitoring constituents; or,

VI.D.5.c. Submit a notice that the Permittee has resampled and is repeating the analysis for the newly detected constituent(s). Within thirty (30) days of the Permittee's receipt of results of the second analysis, the Permittee shall submit the results of the second analysis and either add the newly detected constituent(s) to the list of monitoring constituents pursuant to VI.D.5.a, or submit a report justifying why the detected constituent(s) should not be included in the monitoring program pursuant to VI.D.5.b.

VI.D.6. If a constituent is detected that must be added to the monitoring list in accordance with VI.D.5, the Agency shall initiate a permit modification to add a groundwater protection standard for that constituent to Table 4, using the procedures in 40 C.F.R. §270.41.

VI.D.7. If, based on new information, the Permittee concludes that different wells are more appropriate for purposes of Appendix IX monitoring, new wells must be proposed in a Quarterly Report prior to the annual sampling. The wells proposed by the Permittee require approval of the Administrator. Selection and approval of the monitoring wells identified for Appendix IX monitoring shall be based on location and the numbers and levels of contaminants detected at the proposed well location and must be at least equally effective in detecting new releases or degradation products. This selection and approval of new Appendix IX monitoring wells shall not require a permit modification and is subject to the dispute resolution procedures in Permit Condition V.N.

VI.D.8. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Permit Conditions VI.D.1, VI.D.2, and VI.D.4 in the operating record as required by Permit Condition I.Y. These results shall be submitted to the Agency within fifteen (15) days of the Permittee's receipt of a written request from the Administrator, provided that the data has been received from the laboratory.

**VI.E. DATA EVALUATION**

VI.E.1. The results of the analyses obtained pursuant to Permit Condition VI.D.3.a shall be compared to Table 4 of this Permit, the Groundwater Protection Standards. Any constituent concentration equal to or above the Standard contained in Table 4 will be considered an indication of contamination. Any constituent concentration less than the Standard in Table 4 will be considered to be in compliance with that Standard.

VI.E.2. For any monitoring well specified in Table 1 of this Permit that has been in compliance with the Groundwater Protection Standards specified in Table 4 of this Permit for three (3) consecutive years, the Permittee may reduce the required water quality sampling frequency for that well from quarterly to annually. Written notice shall be provided to the Agency before monitoring frequency is reduced.

VI.E.3. Upon detection of constituents exceeding the Groundwater Protection Standards specified in Table 4 of this Permit in any monitoring well subject to Permit Condition VI.E.2, the Permittee shall:

VI.E.3.a. Notify the Administrator of this finding, in writing, in the next Quarterly Report following the detection; and,

VI.E.3.b. Resume the corrective action monitoring program as specified in Table 1 of this Permit for all wells and, within ninety (90) days of notification required in VI.E.3.a, submit an application for modification of the corrective action program to effectively remediate the source of the contamination; or within ninety (90) days of notification required in VI.E.3.a, submit a report to the Agency which identifies the source of the

contamination, including all supporting documentation, the extent of the contamination, and an application for a modification of the corrective action program to effectively remediate the source of the contamination and a revised corrective action monitoring program; or

VI.E.3.c. Submit to the Administrator, in the next Quarterly Report following the detection, notice that the Permittee intends to demonstrate that an off-site source caused the increase, or that the increase resulted from an error in sampling, analysis, or evaluation. A report of this demonstration shall be made within ninety (90) days of notice of intention to make this demonstration. If necessary, an application for a permit modification to make any appropriate changes to the corrective action monitoring program shall be submitted with the report.

VI.E.3.d. If, as determined by the Administrator, the report submitted in accordance with Permit Condition VI.E.3.c fails to identify any off-site source of contamination or an error in sampling, analysis, or evaluation, then the Permittee shall comply with Permit Condition VI.E.3.b. within sixty (60) days of written notification by the Administrator. If the Administrator approves the notice, then the Permittee shall resume monitoring in accordance with the monitoring program specified in Permit Condition VI.E.2.

VI.E.4. The Permittee may discontinue the Corrective Action Monitoring Program for a post-closure unit and implement the Compliance Monitoring Program for that unit, as specified by Part VII of this Permit, at such a time when the Permittee has submitted and demonstrated the following:

VI.E.4.a. The Permittee has demonstrated that the Groundwater Protection Standards, as specified in Table 4, have been met; and

VI.E.4.b. Has submitted an evaluation of the health and environmental risk due to the cumulative effects of the mixture of all parameters remaining in the

groundwater, performed in accordance with applicable Agency guidelines and regulations; and

VI.E.4.c. The Agency has determined that the cumulative health and environmental risk does not exceed standards based on applicable Agency guidelines and regulations.

The Permittee may ask the Agency at any time, after groundwater protection standards have been met, to make this determination. This Agency determination is subject to the dispute resolution procedures in Permit Condition V.N.

VI.E.4.d. The Permittee or the Agency may determine that the Groundwater Protection Standards are no longer appropriate for the post-closure unit prior to an evaluation made under Permit Condition VI.E.4.a. In such a situation, the Permittee shall request a permit modification, in accordance with condition VI.F.1 of this Permit and 40 C.F.R. § 270.42, to revise the Groundwater Protection Standards set forth in Table 4, based on applicable Agency guidelines and regulations. Upon approval of the permit modification, the Permittee shall continue the Corrective Action Monitoring Program until the conditions in part VI.E.4.a through VI.E.4.c of this Permit are met.

VI.E.4.e. For three (3) years after the demonstration is made under Permit Condition VI.E.4.a through VI.E.4.c, the Permittee shall continue to follow the approved Groundwater Corrective Action Monitoring Program and data evaluation and reporting under Permit Condition VI.D and VI.E. During this period, the AS/SVE and treatment systems shall be maintained in a readiness condition.

VI.E.5. If, during the Corrective Action Monitoring Program period covered under Permit Conditions VI.E.4, the health and environmental risk due to the cumulative effects of the mixture of parameters is found to exceed standards based on applicable Agency guidelines and regulations, then the Permittee shall notify the Administrator within thirty (30) days of such a finding. Under such conditions the Permittee shall implement renewed corrective actions or other procedures as

described in Permit Condition VI.E.3 to address the exceedances.

During this period, the Permittee shall continue to follow the approved Groundwater Corrective Action Monitoring Program until successfully achieving the conditions described in Permit Condition VI.E.4.

- VI.E.6. Upon successful completion of Permit Condition VI.E.4, the Permittee will commence an approved Compliance Monitoring Program pursuant to Part VII.

**VI.F. MODIFICATION OF STANDARDS AND MONITORING FREQUENCIES**

- VI.F.1. The Permittee may submit a request for a permit modification pursuant to 40 C.F.R. § 270.42 at any time during the life of this Permit for revisions of the standards specified in Table 4 of this Permit. Any such modification must be based on a demonstration that the revised standards are protective of human health and the environment, based on the analytical data obtained pursuant to this Permit.

- VI.F.2. The Permittee may request a revision to the monitoring frequencies, monitoring point locations, and AS/SVE point locations, listed in Table 1 of this Permit and located as designated on Figures 2 and 3 of this Permit, based on submission to the Administrator of a demonstration that the revised monitoring frequencies, monitoring point locations, or AS/SVE point locations are as effective in ensuring effective performance of the corrective action program, based on the data obtained pursuant to this Permit.

Evaluation by the Administrator of request(s) for these revisions to the monitoring frequencies, monitoring point locations, or AS/SVE point locations shall be subject to the dispute resolution procedures specified in Permit Condition V.N.

**PART VII - COMPLIANCE GROUNDWATER MONITORING**

**VII.A. IMPLEMENTATION OF GROUNDWATER MONITORING PROGRAM**

The Permittee shall implement a groundwater compliance monitoring program for a post-closure unit in accordance with Permit Conditions VII.B through VII.E. The Permittee shall commence this compliance monitoring program as specified by Permit Condition VI.E.4.

**VII.B. DESIGNATION OF MONITORING LOCATIONS**

After the permit conditions specified in part VI.E.4 of this Permit have been met, all wells in Table 2 shall be monitored quarterly for all constituents in Table 4.

**VII.C. WELL CONSTRUCTION, MAINTENANCE, AND REPLACEMENT**

VII.C.1. The Permittee shall maintain all monitoring wells in good working order, making necessary repairs in a timely manner so that the sampling program is not hindered or delayed. The Permittee shall maintain an adequate supply of replacement parts and repair equipment to ensure that each sampling event proceeds on schedule.

VII.C.2. The Permittee shall follow the procedures in the Post-Closure Care Plan, Attachment 4A of this Permit, for routine inspection of the monitoring wells. Visual evidence of damage to or deterioration of wells, and complete records of all well maintenance activities, must be noted in the operating record.

VII.C.3. The Permittee shall maintain borehole integrity of each monitoring well, as required by 40 C.F.R. §264.97(c), using the method designated in Permit Conditions VI.C.2.b.

VII.C.4. If a monitoring well must be decommissioned and replaced for any reason during the term of this Permit, it shall be replaced prior to the next scheduled sampling event.

The Permittee may request that the well be replaced within ninety (90) days of determination of the need for replacement during inclement or severe winter weather. Prior to decommissioning, the Permittee shall apprise the Administrator of the rationale for the decision.

The replacement well shall be installed as close as practicable to the well being replaced. The Permittee shall provide information regarding the new well in the operating record and to the Administrator as specified by Permit Conditions VI.C.4 and VI.C.5.

The Permittee shall close each well being replaced no later than ninety (90) days after installation of the replacement well. Wells shall be decommissioned in accordance with the "Well Decommissioning Plan," Attachment 9 of this Permit.

VII.C.5. Inspection of drilling and well construction of any new or replacement monitoring well shall be performed by a qualified geologist or geological engineer. The qualified professional shall construct and maintain a detailed log of each well describing the geologic strata encountered during drilling. The logs and descriptions shall include:

- (1) Date and time of construction;
- (2) Drilling method and any fluid used;
- (3) Well location (surveyed to within 0.5 feet);
- (4) Borehole diameter and well casing diameter;
- (5) Well depth (to within 0.1 feet);
- (6) Drilling logs and lithologic logs, including a description of soil or rock types, color, petrology, weathering, texture, structure, and fractures;
- (7) Casing materials;
- (8) Screen material and design, including screen length and slot size;
- (9) Casing and screen joint type;
- (10) Filter pack material, including size and placement method and approximate volume;
- (11) Composition and approximate volume of sealant material and method of placement;
- (12) Surface seal design and construction;
- (13) Well development procedures;

- (14) Ground surface elevation (to within 0.01 feet);
- (15) Top of casing elevation (to within 0.01 feet); and,
- (16) Detailed drawing of well, including dimensions.

VII.C.6. The Permittee shall submit the logs and descriptions obtained pursuant to Permit Condition VII.C.5, as-built drawings, revisions to Figures 2 and 3 of this Permit reflecting the location of the new well, and revisions to Table 1 of this Permit, if necessary due to renaming of the well, to include the new monitoring wells, to the Administrator within ninety (90) days after completion of the well. Incorporation of such revised figures and tables shall not be considered a modification of the permit.

VII.C.7. The installation of new monitoring wells shall be consistent with guidance contained in the most recent edition of ADEC's Monitoring Well Guidance, dated September 2013.

**VII.D. PROGRAM OPERATION**

VII.D.1. The Permittee shall obtain water level elevation measurements from each monitoring well specified in Table 2 of this Permit, located as designated on Figures 2, 3 and 4 of this Permit, at the frequencies designated in Table 2 of this Permit, in accordance with the procedures in Attachment 4A of this Permit.

Measurements for each monitoring well shall be obtained prior to purging of the well. In order to minimize the potential for error caused by temporal variations, the Permittee shall obtain all water level elevation measurements within as short a time as practicable. Barometric pressure shall be recorded for each sampling event.

The Permittee shall use these data to determine the rate and direction of groundwater flow semi-annually, for the periods of high and low water table elevation. The Permittee shall construct water table elevation contour maps semi-annually. The contour maps and flow rates shall be submitted to the Administrator in the semi-annual reports. The Permittee shall submit, with the contour maps, a written review of the adequacy of the

groundwater monitoring system relative to observed groundwater flow directions.

VII.D.2. Upon successful completion of the requirements of Section VI.E.4, wells will be sampled as specified in Table 2 of this Permit, in accordance with the procedures in Attachment 4A of this Permit.

VII.D.3. Analysis and reporting of groundwater quality shall include the following:

VII.D.3.a. The Permittee shall analyze all groundwater samples obtained under Permit Condition VII.D.2 for the parameter list in Table 4 of this Permit quarterly, according to the schedule in Table 2 of this Permit, using procedures specified by Attachment 4A of this Permit.

VII.D.3.b. Quality assured results of these analyses, including laboratory detection limits achieved for each constituent, shall be submitted to the Administrator in the next Quarterly Report following the Permittee's receipt of results from the laboratory. In no case shall the period between the date of sampling and the date of submission of analytical results exceed one hundred twenty (120) days unless an extension is granted by the Administrator.

VII.D.4. The Permittee shall, every three (3) years (2021, 2024, etc.), during the October sampling event, analyze a groundwater sample from the designated wells identified in Permit Condition VI.D.4 for all 40 C.F.R. Part 264, Appendix IX, constituents. These constituents are presented in Attachment 4A, Appendix B.

If the designated wells have insufficient yield, the Permittee shall sample the well with the next highest contamination concentrations observed in the previous sampling event. If any Appendix IX constituents not identified in Table 4 of this Permit are detected, the Permittee shall report the concentrations of these detected constituents to the Administrator in the next quarterly report following the Permittee's receipt of results from the laboratory. In no case shall the period between the date of sampling and the date of submission of analytical results exceed one hundred twenty

(120) days unless an extension is granted by the Administrator.

VII.D.5. For any constituent(s) detected under Permit Condition VII.D.4 that is not included in the monitoring program currently in effect under the permit, the Permittee shall, within forty-five (45) days of receipt of results from the laboratory:

VII.D.5.a. Add the newly detected constituent(s) to the list of monitoring constituents, and provide the Administrator with a copy of the revised list for inclusion into the permit. Such modification to the constituent monitoring list will not require a permit modification; or

VII.D.5.b. Submit a report justifying why the detected constituent(s) should not be included in the monitoring program. If the Administrator does not accept the Permittee's justification, the Permittee shall add the constituent to the monitoring list in accordance with VII.D.5.a. If the Administrator accepts the justification, the constituent does not have to be added to the list of monitoring constituents; or,

VII.D.5.c. Submit a notice that the Permittee has resampled and is repeating the analysis for the newly detected constituent(s). Within thirty (30) days of the Permittee's receipt of results of the second analysis, the Permittee shall submit the results of the second analysis and either add the newly detected constituent(s) to the list of monitoring constituents pursuant to VII.D.5.a, or submit a report justifying why the detected constituent(s) should not be included in the monitoring program pursuant to VII.D.5.b.

VII.D.6. If, based on new information, the Permittee concludes that different wells are more appropriate for purposes of Appendix IX monitoring, new wells must be proposed in a Quarterly Report prior to the annual sampling. The wells proposed by the Permittee require approval of the Administrator. Selection and approval of the monitoring wells identified for Appendix IX monitoring shall be based on location and the numbers and levels of contaminants detected at the proposed well location.

This selection and approval of new Appendix IX monitoring wells shall not require a permit modification and is subject to the dispute resolution procedures in Permit Condition V.N.

- VII.D.7. If a constituent is detected that must be added to the monitoring list in accordance with VII.D.5.a, the Agency shall initiate a permit modification to add a groundwater protection standard for that constituent to Table 4, using the procedures in 40 C.F.R. §270.41.
- VII.D.8. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Permit Conditions VII.D.1, VII.D.3, and VII.D.4 in the operating record as required by Permit Condition I.Y. These results shall be submitted to the Agency within fifteen (15) days of the Permittee's receipt of a written request from the Administrator, provided the data has been received from the laboratory.

**VII.E.                    DATA EVALUATION**

- VII.E.1. The results of the analyses obtained pursuant to Permit Condition VII.D.3 shall be compared to Table 4 of this Permit, the Groundwater Protection Standards. Any constituent above the Standards contained in Table 4 of this Permit will be considered an indication of contamination. Any constituent equal to or less than the Standard contained in Table 4 of this Permit will be considered to be in compliance with that Standard.
- VII.E.2. Upon detection of constituents exceeding the Groundwater Protection Standards specified in Table 4 of this Permit in any well subject to Permit Condition VII.D.2, the Permittee shall:
- VII.E.2.a.            Notify the Administrator of this finding, in writing, in the next Quarterly Report following the detection, in accordance with 40 C.F.R. §264.99(I)(1); and,
- VII.E.2.b.            Immediately collect two (2) samples from any affected well(s), purging the well(s) between samples, and reanalyze both samples for all constituents specified in Table 4 of this Permit.

VII.E.3. If the results of the analyses show that:

VII.E.3.a. Neither verification sample described in Permit Condition VII.E.2.b confirm the detection of constituents above the Groundwater Protection Standards, the Permittee shall resume compliance monitoring according to the standard quarterly schedule and notify the Administrator that the compliance monitoring program is being resumed.

VII.E.3.b. Only one of the verification samples described in Permit Condition VII.E.2.b confirms the detection of constituents above the Groundwater Protection Standards, the Permittee shall repeat the verification procedure which begins in Permit Condition VII.E.2.b.

VII.E.3.c. Both verification samples described in Permit Condition VII.E.2.b confirm the detection of constituents above the Groundwater Protection Standards, the Permittee shall comply with Permit Condition VII.E.4.

VII.E.4. The Permittee shall either:

VII.E.4.a. Within ninety (90) days of the notice required by Permit Condition VII.E.2.a, implement the corrective action program as specified in Part V of this Permit and the corrective action monitoring program as specified in Part VI of this Permit; or,

VII.E.4.b. Submit, within ninety (90) days of the notice required by Permit Condition VII.E.2.a, for review and approval by the Agency, a proposal for a modified corrective action program and corrective action monitoring; or

VII.E.4.c. Submit to the Administrator, within fifteen (15) days of the notice required by Permit Condition VII.E.2.a, notice that the Permittee intends to demonstrate that an off-site source caused the increase, or that the increase resulted from an error in sampling, analysis, or evaluation. A report of this demonstration shall be made within ninety (90) days of the notice required by Permit Condition VII.E.2.a. If necessary to enhance the effectiveness of the monitoring in addressing the

new constituent or new source, an application for a permit modification to make any appropriate changes to the compliance monitoring program shall be submitted with the report; or

- VII.E.4.d. Perform, and submit to the Agency for review and approval, an evaluation of the health and environmental risk due to the cumulative effects of the mixture of parameters, performed in accordance with applicable Agency and guidelines and regulations; and
- VII.E.4.e. Continue to monitor in accordance with the compliance monitoring program.
- VII.E.5. If, as determined by the Administrator, the report submitted in accordance with Permit Condition VII.E.4.c or VII.E.4.d fails to identify any off-site source of contamination or an error in sampling, analysis, or if the cumulative risk of the mixture of parameters exceeds applicable Agency guidelines and regulations, then the Permittee shall comply with Permit Condition VII.E.4.a or VII.E.4.b if the corrective action monitoring program has been approved by the Agency.
- VII.E.6. Except as may be required by Permit Conditions VII.E.4 and VII.E.5, the Permittee shall continue operating the compliance monitoring program until the end of the post-closure care period, as required by Permit Condition IV.B.

**PART VIII - DETECTION GROUNDWATER MONITORING**

**VIII.A. IMPLEMENTATION OF GROUNDWATER MONITORING PROGRAM**

The Permittee shall implement an annual groundwater detection monitoring program for Site 6A (MOGAS) in accordance with Permit Conditions VIII.B through VIII.E. This detection monitoring program shall commence within ninety (90) days of the effective date of this Permit and shall continue to the end of the post-closure period.

**VIII.B. DESIGNATION OF MONITORING LOCATIONS**

The Permittee shall maintain a groundwater monitoring system which complies with the requirements of 40 C.F.R. §§ 264.95 and 264.97 as specified below at the locations specified in Table 3 of this Permit (locations depicted on Figure 4 of this Permit).

**VIII.C. WELL CONSTRUCTION, MAINTENANCE AND REPLACEMENT**

- VIII.C.1. The Permittee shall maintain all monitoring wells in good working order, making necessary repairs in a timely manner so that the sampling program is not hindered or delayed. The Permittee shall maintain an adequate supply of replacement parts and repair equipment to ensure that each sampling event proceeds on schedule.
- VIII.C.2. The Permittee shall follow the procedures in the Post-Closure Care Plan, Attachment 4A of this Permit, for routine inspection of the monitoring wells. Visual evidence of damage to or deterioration of wells, and complete records of all well maintenance activities, must be noted in the operating record.
- VIII.C.3. The Permittee shall maintain borehole integrity of each monitoring well in the detection monitoring program, as required by 40 C.F.R. §264.97(c), using the method designated in Permit Conditions VI.C.2.b.
- VIII.C.4. If a monitoring well must be decommissioned and replaced for any reason during the term of this Permit, it shall be replaced prior to the next scheduled sampling event. The Permittee may request that the well be replaced within ninety (90) days of determination of the need for replacement during inclement or severe winter weather.

Prior to decommissioning, the Permittee shall apprise the Administrator of the rationale for the decision.

The replacement well shall be installed as close as practicable to the well being replaced. The Permittee shall provide information regarding the new well in the operating record and to the Administrator as specified by Permit Conditions VI.C.4 and VI.C.5.

The Permittee shall close each well being replaced no later than ninety (90) days after installation of the replacement well. Wells shall be decommissioned in accordance with the "Well Decommissioning Plan," Attachment 9 of this Permit.

VIII.C.5. Inspection of drilling and well construction of any new or replacement monitoring well shall be performed by a qualified geologist or geological engineer. The qualified professional shall construct and maintain a detailed log of each well describing the geologic strata encountered during drilling. The logs and descriptions shall include:

- (1) Date and time of construction;
- (2) Drilling method and any fluid used;
- (3) Well location (surveyed to within 0.5 feet);
- (4) Borehole diameter and well casing diameter;
- (5) Well depth (to within 0.1 feet);
- (6) Drilling logs and lithologic logs, including a description of soil or rock types, color, petrology, weathering, texture, structure, and fractures;
- (7) Casing materials;
- (8) Screen material and design, including screen length and slot size;
- (9) Casing and screen joint type;
- (10) Filter pack material, including size and placement method and approximate volume;
- (11) Composition and approximate volume of sealant material and method of placement;
- (12) Surface seal design and construction;

- (13) Well development procedures;
- (14) Ground surface elevation (to within 0.01 feet);
- (15) Top of casing elevation (to within 0.01 feet); and,
- (16) Detailed drawing of well, including dimensions.

VIII.C.6. The Permittee shall submit the logs and descriptions obtained pursuant to Permit Condition VIII.C.5, as-built drawings, revisions to Figure 4 of this Permit reflecting the location of the new well, and revisions to Table 3 of this Permit, if necessary due to renaming of the well, to include the new monitoring wells, to the Administrator within ninety (90) days after completion of the well.

Incorporation of such revised figures and tables shall not be considered a modification of the permit.

VIII.C.7. The installation of new monitoring wells shall be consistent with guidance contained in the most recent ADEC Monitoring Well Guidance, dated September 2013.

**VIII.D.                    PROGRAM OPERATION**

VIII.D.1. The Permittee shall obtain water level elevation measurements from each monitoring well specified in Table 3 of this Permit (locations depicted on Figure 4 of this Permit) at the frequencies designated in Table 3 of this Permit, in accordance with the procedures in Attachment 4A of this Permit.

Measurements for each monitoring well shall be obtained prior to purging of the well. In order to minimize the potential for error caused by temporal variations, the Permittee shall obtain all water level elevation measurements within as short a time as practicable. Barometric pressure shall be recorded for each sampling event.

The Permittee shall use these data to determine the rate and direction of groundwater flow annually, for the periods of high and low water table elevation. The Permittee shall construct water table elevation contour maps annually. The contour maps and flow rates shall be submitted to the Administrator annually, in the second of the two semi-annual reports. The Permittee shall submit, with the contour maps, a written review of the

adequacy of the groundwater monitoring system relative to observed groundwater flow directions.

VIII.D.2. The Permittee shall obtain water quality samples from each monitoring point specified in Table 3 of this Permit (locations depicted on Figure 4) of this Permit at the frequencies designated in Table 3 of this Permit in accordance with the procedures in Attachment 4A of this Permit.

VIII.D.3. Analysis and reporting of groundwater quality shall include the following:

VIII.D.3.a. The Permittee shall analyze all groundwater samples obtained under Permit Condition VIII.D.2 for the parameter list in Table 4 of this Permit annually, using procedures specified by Attachment 4A of this Permit.

VIII.D.3.b. Quality assured results of these analyses, including laboratory detection limits achieved for each constituent, shall be submitted to the Administrator in the next Quarterly Report following the Permittee's receipt of results from the laboratory.

In no case shall the period between the date of sampling and the date of submission of analytical results exceed one hundred twenty (120) days unless an extension is granted by the Administrator.

VIII.D.4. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Permit Conditions VIII.D.1, VIII.D.2, and VIII.D.3 in the operating record as required by Permit Condition I.Y. Upon written request by the Agency, these results shall be submitted within fifteen (15) days of the Permittee's receipt of the request, provided the data has been received from the laboratory.

**VIII.E.                    DATA EVALUATION**

VIII.E.1. The results of the analyses obtained pursuant to Permit Condition VIII.D.3 shall be compared to Table 4 of this Permit, the Groundwater Protection Standards, or to the modifications made to this Table pursuant to Permit Condition VI.E.4.d. Any constituent concentration above the Standards contained in Table 4 of this Permit will

be considered an indication of contamination. Any constituent concentration equal to or less than the Standard contained in Table 4 of this Permit will be considered to be in compliance with that Standard.

VIII.E.2. Upon detection of constituents in any monitoring well exceeding the Groundwater Protection Standards specified in Table 4 of this Permit, the Permittee shall:

VIII.E.2.a. Notify the Administrator of this finding, in writing, in the next Quarterly Report following the detection, in accordance with 40 C.F.R. §264.99(I)(1); and,

VIII.E.2.b. Immediately collect two (2) samples from any affected well(s), purging the well(s) between samples, and reanalyze both samples for all constituents specified in Table 4 of this Permit.

VIII.E.3. If the results from the analyses show that:

VIII.E.3.a. Neither verification sample described in Permit Condition VIII.E.2.b confirm the detection of constituents above the Groundwater Protection Standards, the Permittee shall resume detection monitoring according to the standard annual schedule and notify the Administrator that the detection monitoring program is being resumed.

VIII.E.3.b. Only one of the verification samples described in Permit Condition VIII.E.2.b confirms the detection of constituents above the Groundwater Protection Standards, the Permittee shall repeat the verification procedure which begins in Permit Condition VIII.E.2.b.

VIII.E.3.c. Both verification samples described in Permit Condition VIII.E.2.b confirm the detection of constituents above the Groundwater Protection Standards, the Permittee shall comply with Permit Condition VIII.E.4.

VIII.E.4. The Permittee shall sample the affected well(s) within fourteen (14) days of receipt of analytical data obtained in Permit Condition VIII.E.3.c, and analyze for the constituents identified in 40 C.F.R. Part 264 Appendix IX. These constituents are presented in

Attachment 4A, Appendix B. Within ninety (90) days of receipt of the Appendix IX results, the Permittee shall submit to the Administrator either of the following:

- VIII.E.4.a. An application for a permit modification to establish compliance monitoring and corrective action programs as specified in 40 C.F.R. § 264.98(g)(4) and (5); or,
  - VIII.E.4.b. A report demonstrating that an off-site source caused the increase, or that the increase resulted from an error in sampling, analysis, or evaluation, and in addition, when required by 40 C.F.R. § 264.98(h), an application for a permit modification to make any appropriate changes to the detection monitoring program.
- VIII.E.5. If, as determined by the Administrator, the report submitted in accordance with Permit Condition VIII.E.4.b fails to identify any off-site source of contamination or an error in sampling, analysis, then the Permittee shall:
- VIII.E.5.a. Immediately sample and analyze all point of compliance wells, as specified in Table 3 and located on Figure 4 of this Permit for Appendix IX constituents; and,
  - VIII.E.5.b. Establish background concentrations of all Appendix IX constituents identified at the point of compliance, as specified in Table 3 and located on Figure 4 of this Permit as specified by 40 C.F.R. 264.97(h); and
  - VIII.E.5.c. Submit an application for a permit modification within ninety (90) days to establish compliance monitoring and corrective actions programs as specified in 40 C.F.R. § 264.98(h)(4) and (5).

**PART IX - CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS**

**IX.A. STANDARD CONDITIONS**

- IX.A.1. The Permittee must take corrective action to protect human health and the environment from 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, in accordance with Section 3004(u) of RCRA, 42 U.S.C. § 6924(u), 40 C.F.R. § 264.264.90(a), and 40 C.F.R. § 264.101.
- IX.A.2. The Permittee must take corrective action beyond the facility property boundary, where necessary to protect human health and the environment, in accordance with Section 3004(v) of RCRA, 42 U.S.C. § 6924(v), and 40 C.F.R. § 264.101. The Permittee must exhaust all options to implement corrective action beyond the facility property boundary, including but not limited to purchasing affected property by eminent domain, relocating affected populations to new housing, and offering to finance and construct satisfactory water supply utilities to affected properties before making a demonstration, in accordance with 40 C.F.R. § 264.101.
- IX.A.3. All plans and schedules required by the conditions of this Permit are, upon approval of the Administrator, incorporated into this Permit by reference and become an enforceable part of this Permit. Any noncompliance with such approved plans and schedules shall be termed noncompliance with this Permit. Extensions of the due dates for submittal may be granted by the Administrator, in accordance with the permit modification processes under 40 C.F.R. § 270.41.
- IX.A.4. If the Administrator determines that further corrective actions beyond those provided in this Permit, or changes to that which is stated herein, are warranted, then the Administrator shall modify this Permit according to the permit modification processes under 40 C.F.R. § 270.41.
- IX.A.5. All raw data, such as laboratory reports, geological and hydrogeological investigations, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this

Permit, including any reissued permits, shall be provided at the request of the Agency.

**IX.B. REPORTING REQUIREMENTS**

IX.B.1. In the next April or October quarterly report (whichever comes first) following the effective date of this Permit, and every six (6) months thereafter, as part of the semi-annual reports referenced in Permit Condition V.F, the Permittee shall submit to the Administrator signed semi-annual corrective measures progress reports which shall contain:

IX.B.1.a. A discussion and summary of all corrective measures-related activities undertaken during the time period;

IX.B.1.b. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems; and

IX.B.1.c. Projected work for the next reporting period.

IX.B.2. The Permittee shall maintain copies of other reports (e.g., inspection reports), geological and hydrogeological investigations, records of groundwater monitoring wells and associated groundwater surface elevations, and laboratory data, for the active life (including the post-closure period) of the facility, and shall make them available to the Administrator upon request.

IX.B.3. The Administrator may require the Permittee to conduct new or more extensive assessments, investigations, or studies, as needed, based on information provided in these progress reports or other supporting information.

**IX.C. NEWLY-IDENTIFIED OR NEWLY-CREATED SOLID WASTE MANAGEMENT UNITS**

IX.C.1. The Permittee shall notify the Administrator in writing of any newly-identified or newly-created SWMU(s) that are not covered by this Permit, as set out in Attachment 7 of this Permit. This notice shall be provided no later than fifteen (15) days after discovery of the newly identified or created SWMU(s).

- IX.C.2. Within ninety (90) days after the notification provided in accordance with Permit Condition IX.C.1, the Permittee shall prepare a SWMU Assessment Report. At a minimum, the Report shall provide the following information for each newly- identified or newly-created SWMU:
- IX.C.2.a. The location of each newly-identified SWMU in relation to other SWMUs, building numbers, or other descriptive landmarks;
- IX.C.2.b. The type and function of the unit;
- IX.C.2.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);
- IX.C.2.d. The period during which the unit was operated;
- IX.C.2.e. The specifics on all wastes that have been or are being managed at the SWMU, to the extent available; and
- IX.C.2.f. A description of any release (or suspected release) of hazardous constituents originating from the unit, including planned or unplanned releases to the air. Include information on the date of release, type of hazardous waste or hazardous constituents, quantity released, nature of the release, extent of release migration, and cause of release (e.g. overflow, broken pipe, tank leak, etc.). Also provide any available data which would quantify the nature and extent of environmental contamination, including the results of soil and/or groundwater sampling and analysis efforts. Likewise, submit any existing monitoring information that indicates release of hazardous waste or hazardous constituents has not occurred or is not occurring.
- IX.C.3. Based on the results of this Report, the Administrator shall determine the need for further investigations at specific unit(s) covered in the SWMU Assessment Report. If the Administrator determines that such investigations are needed, the Administrator may require the Permittee to prepare a RFI Work Plan and/or RFI report within a specified time and consistent with EPA guidance. The RFI

Work Plan and/or report is subject to the dispute resolution procedures of Permit Condition V.N. If the Administrator determines that corrective measures are required, the Permittee shall submit a request for a permit modification to implement corrective measures.

**IX.D. NEWLY-DISCOVERED RELEASES AT SOLID WASTE MANAGEMENT UNITS**

IX.D.1. The Permittee shall notify the Administrator, in writing, of any release(s) of hazardous waste or hazardous constituents from any SWMU. Such newly-discovered releases may be from newly-identified SWMUs, from SWMUs at which the Administrator had previously determined that no further investigation was necessary, or from SWMUs investigated as part of this Permit. This notification shall be submitted in two parts:

IX.D.1.a. First, within fifteen (15) days of discovery of the release the Permittee shall submit in writing an initial notification report of the discovery. This notification shall alert the Agency to the magnitude of the threat.

IX.D.1.b. Second, within sixty (60) days of such a discovery the Permittee must submit a written report. The report shall discuss the Permittee's efforts to investigate and/or remediate the discovered release and shall specifically include:

- i. the concentrations and estimated quantities of any hazardous wastes or hazardous constituents released;
- ii. the known, or expected, pathway(s) through which the contamination is migrating (or may migrate), and the extent, rate, and direction of that migration;
- iii. the projected fate and transport of the release;
- iv. the likely exposure pathway(s) for potential receptors, and the consequences of exposure to these receptors; and,
- v. an outline of proposed Interim Measures to arrest the release, as well as a schedule for implementing

the Interim Measures. The schedule should be justified by a discussion of possible consequences arising from any delay in implementing Interim Measures.

IX.D.2. If, based either on information submitted in Permit Condition IX.C.1 or IX.D.1 above, or on information obtained during the investigation or monitoring of the facility, the Agency determines at any time that a threat to human health or the environment may result from a release at the facility, the Permittee will be directed by a notification from the Agency to implement interim corrective measures designed to minimize the threat to human health and the environment, subject to review and approval by the Agency. Interim corrective measures are subject to the dispute resolution procedures in Permit Condition V.N. Implementation by the Permittee of treatment or containment activities taken during immediate response to a discharge of hazardous waste, an imminent and substantial threat of a discharge of hazardous waste, or a discharge of material which, when discharged, becomes a hazardous waste, is not subject to this Permit. [40 C.F.R. § 270.1(c)(3)]

IX.D.3. Within ninety (90) days of discovery of a release, the Permittee shall submit a Report describing the interim corrective measures activities taken to date. This Report shall include the reporting requirements specified in Permit Condition IX.B. If the Administrator determines that additional investigation or corrective measures are required, the Permittee shall submit a request for a permit modification to investigate and perform additional corrective measures, or the Agency may initiate a permit modification.

**IX.E. RCRA FACILITY INVESTIGATION WORK PLAN**

IX.E.1. If the Administrator determines that a RFI is necessary for any newly discovered or newly created SWMU or for a newly discovered release under Permit Conditions IX.C or IX.D, or if needed to further investigate an existing SWMU, the Permittee shall submit an RFI Work Plan to the Administrator. Such Work Plans must address those applicable SWMU's, releases of hazardous waste including hazardous constituents, and media of concern which, based on the permit, require corrective action, based upon new information or new releases. The RFI Work Plan

shall be consistent with the U.S. Environmental Protection Agency document RFI Guidance, OSWER Directive 9502.00- 6C, dated May, 1989, and with EPA corrective action guidance, Attachment 8 of this Permit.

- IX.E.1.a. The RFI Work Plan shall describe the objectives of the investigation and the overall technical and analytical approach to completing all actions necessary to characterize the nature, direction, rate, movement, and concentration of releases of hazardous waste, including hazardous constituents from specific SWMUs or groups of SWMUs, and their actual or potential receptors. The RFI Work Plan shall detail all proposed activities and procedures to be conducted at the unit, the schedule for implementing and completing such investigations, and the overall management of the RFI. The RFI Work Plan shall include action levels consistent with EPA health and ecological based guidance effective at the time of implementation.
- IX.E.1.b. In addition, the RFI Work Plan shall discuss sampling and data collection quality assurance and data management procedures, including formats for documenting and tracking data and other results of investigations, and health and safety procedures.
- IX.E.2. After the Permittee submits the RFI Work Plan, the Administrator may either approve or disapprove the RFI Work Plan in writing. If the Administrator disapproves the RFI Work Plan, the Administrator shall either:
- (1) notify the Permittee in writing of the deficiencies in the RFI Work Plan and specify a due date for submittal of a revised RFI Work Plan; or
  - (2) revise and approve with modification the RFI Work Plan and notify the Permittee of the revisions. Submittals required by this permit condition do not require a permit modification, and are subject to the dispute resolution procedures in Permit Condition V.N.
- IX.E.3. The Administrator may review for approval as part of the RFI Work Plan any plans developed pursuant to Permit Condition IX.C.3., addressing further investigations of newly-identified SWMUs, or Permit Condition IX.D, addressing new releases from previously-identified

SWMUs. The Administrator may modify this Permit according to the permit modification procedures under 40 C.F.R. § 270.41, to incorporate these SWMUs and releases into the RFI Work Plan.

- IX.E.4. After the Permittee has received written approval from the Administrator for the RFI Work Plan, the Permittee shall begin implementation of the RCRA Facility Investigation according to the schedules specified in the approved RFI Work Plan. Pursuant to Permit Condition IX.A.4, the RFI shall be conducted in accordance with the approved RFI Work Plan.

**IX.F. RCRA FACILITY INVESTIGATION REPORT**

- IX.F.1. The Permittee is to develop and submit a RCRA Facility Investigation Report consistent with the U.S. Environmental Protection Agency document RFI Guidance, OSWER Directive 9502.00-6C, dated May, 1989, and with EPA Corrective Action Guidance, Attachment 8 of this Permit.

- IX.F.2. Within ninety (90) days after the completion of the RFI and receipt of validated data, the Permittee shall submit an RFI Final Report to the Administrator. The RFI Report shall describe the procedures, methods, and results of all facility investigations of SWMUs and their releases, including information on the type and extent of contamination at the facility, sources and migration pathways, and actual or potential receptors. The RFI Final Report shall present all information to support further corrective action decisions at the unit.

**IX.G. INTERIM CORRECTIVE MEASURES**

- IX.G.1. If during the course of any activity initiated under this Permit, the Administrator determines that a release or potential release of hazardous waste, including hazardous constituents, from a SWMU, poses a threat to human health and the environment, the Permittee will be directed by a notification from the Agency to implement interim corrective measures designed to minimize the threat to human health and the environment, subject to review and approval by the Agency. Interim corrective measures are subject to the dispute resolution procedures in Permit Condition V.N. Implementation by the Permittee of treatment or containment activities

taken during immediate response to a discharge of hazardous waste, an imminent and substantial threat of a discharge of hazardous waste, or a discharge of material which, when discharged, becomes a hazardous waste, is not subject to this Permit. [40 C.F.R. § 270.1(c)(3)]

IX.G.2. The following factors may be considered by the Administrator in determining the need for additional interim corrective measures:

IX.G.2.a. Time required to develop and implement a final remedy;

IX.G.2.b. Actual and potential exposure of human and environmental receptors;

IX.G.2.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

IX.G.2.d. The potential for further degradation of the medium absent interim measures;

IX.G.2.e. Presence of hazardous waste in containers or tanks that may pose a threat of release;

IX.G.2.f. Presence and concentration of hazardous waste including hazardous constituents in soils that have the potential to migrate to groundwater or surface water;

IX.G.2.g. Weather conditions that may affect the current levels of contamination;

IX.G.2.h. Risks of fire, explosion, or accident; and

IX.G.2.i. Other situations that may pose threats to human health and the environment.

**IX.H. DETERMINATION OF CORRECTIVE ACTION COMPLETE WITHOUT CONTROLS**

IX.H.1. Based on the results of the RFI and other relevant information, the Permittee may submit an application to the Administrator for a Class 3 permit modification under 40 C.F.R. § 270.42 to terminate all or parts of the corrective action requirements in this Permit. This

Permit modification application must contain information demonstrating that there are no releases of hazardous waste, including hazardous constituents from SWMUs at the facility, that pose a threat to human health and the environment, as well as information required in 40 C.F.R. § 270.42(c), which incorporates by reference 40 C.F.R. §§ 270.13 through 270.21, 270.62, and 270.63.

If, based upon review of the Permittee's request for a permit modification, the results of the RFI, and other information, including comments received during the sixty (60) day public comment period required for a Class 3 permit modification, the Administrator determines that releases or suspected releases, which were investigated, either are non-existent or do not pose a threat to human health and the environment, the Administrator will grant the requested modification for the identified SWMU or SWMUs.

IX.H.2. A determination of corrective action complete without controls shall not preclude the Administrator from requiring continued or periodic monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous wastes, including hazardous constituents, are likely to occur, if necessary to protect human health and the environment.

IX.H.3. A determination of corrective action complete without controls shall not preclude the Administrator from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, the Administrator may initiate a permit modification according to 40 C.F.R. § 270.41, to rescind the determination made in accordance with Permit Condition IX.H.1.

**IX.I. CORRECTIVE MEASURES STUDY**

IX.I.1. If the Administrator has reason to believe that a SWMU has released concentrations of hazardous constituents in excess of the current EPA health and ecological based levels, or if the Administrator determines that contaminants present at levels below the current EPA

health based levels pose a threat to human health and the environment given site-specific exposure conditions, the Administrator may require a CMS and shall notify the Permittee in writing. This notice shall identify the hazardous constituents(s) which have exceeded action levels as well as those which have been determined to threaten human health and the environment given site-specific exposure conditions.

IX.I.2. No later than sixty (60) days after the Permittee has received notification from the Administrator, under Permit Condition IX.I.1, of the need for a CMS, the Permittee shall submit to the Agency a schedule for conducting a CMS. Upon EPA approval of the schedule, the Permittee shall implement the Corrective Measures Study according to the approved schedule. The CMS shall be consistent with EPA guidance, Attachment 8 of this Permit.

IX.I.3. The Permittee shall submit a CMS Report according to the schedule in Attachment 7 of this Permit. The CMS Report shall summarize the results of the investigations for each remedy, and of any bench-scale or pilot tests conducted. The CMS Report must include an evaluation of each remedial alternative, and a proposal for corrective measures implementation. The report shall contain adequate information to support the Administrator in the remedy selection decision making process, described under Permit Condition IX.J of the permit.

IX.I.4. Based on preliminary results and the CMS Report, the Administrator may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies and modify the CMS Report accordingly, within a timeframe specified by the Agency. Modifications to the CMS Report are subject to the dispute resolution procedures of Permit Condition V.N.

**IX.J. REMEDY SELECTION**

Based on the results of the RFI Report, CMS Report, or any further evaluations of additional remedies, the Administrator will select a remedy that will:

- (1) be protective of human health and the environment;

(2) meet the concentration levels of hazardous constituents in each medium that the remedy must achieve to be protective of human health and the environment;

(3) control the source(s) of release(s) so as to reduce or eliminate, to the maximum extent practicable, further releases that might pose a threat to human health and the environment; and

(4) meet all applicable waste management requirements.

**IX.K. PERMIT MODIFICATION FOR REMEDY**

Based on information the Permittee submits in the RFI Final Report, the CMS Final Report, or other information, the Administrator will initiate a modification to this Permit for selection and implementation of the remedy, pursuant to 40 C.F.R. § 270.41.

**IX.L. CORRECTIVE MEASURES IMPLEMENTATION FOR SWMUS 1, 10/11, 18, 28 AND 33A**

The Permittee shall implement the Corrective Measures selected by EPA described in Attachment 11 of this Permit in accordance with all EPA-approved Submittals, including the site-specific CMI Work Plans as reviewed and approved by EPA.

Development of CMI Work Plans shall be consistent with Attachment 8 of this Permit and shall detail the design, construction, operation, maintenance, and monitoring of the performance of the Corrective Measures selected by EPA to protect human health and the environment, and shall include a schedule for all activities, including Submittals. The Permittee shall design the Corrective Measures so that the established media cleanup standards will be achieved.

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**Table 1 Corrective Action Monitoring Program**

<b>WELL ID</b>	<b>WATER QUALITY SAMPLING</b>	<b>WATER LEVEL ELEVATION</b>
<b>Site 3 - Laundry</b>		
MW-03-003	Semi-annual	Semi-annual
MW-03-013	Quarterly	Quarterly
MW-03-018	Semi-annual	Semi-annual
MW-03-022	Quarterly	Quarterly
MW-03-025	Semi-annual	Semi-annual
MW-03-107S	Semi-annual	Semi-annual
MW-03-202	Quarterly	Quarterly
MW-03-401	Semi-annual	Semi-annual
MW-03-402D	Quarterly	Quarterly
MW-03-402M	Semi-annual	Semi-annual
MW-03-407D	Semi-annual	Semi-annual
MW-03-502M	Quarterly	Quarterly
MW-03-503D	Semi-annual	Semi-annual
<b>Site 7A - Barrel Storage Area No. 1</b>		
MW-7A-003	Quarterly	Quarterly
MW-7A-004	Quarterly	Quarterly
MW-7A-007	Semi-annual	Semi-annual
MW-7A-011	Quarterly	Quarterly
MW-7A-012	Semi-annual	Semi-annual
MW-7A-013	Quarterly	Quarterly
MW-7A-018	Quarterly	Quarterly
MW-7A-023	Semi-annual	Semi-annual
MW-7A-024	Semi-annual	Semi-annual

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**Table 2 Compliance Monitoring Program**

<b>WELL ID</b>	<b>WATER QUALITY SAMPLING</b>	<b>WATER LEVEL ELEVATION</b>
<b>Site 3 - Laundry</b>		
MW-03-013	Quarterly	Quarterly
MW-03-022	Quarterly	Quarterly
MW-03-107S	Semi-annual	Semi-annual
MW-03-202	Quarterly	Quarterly
MW-03-402D	Quarterly	Quarterly
<b>Site 7A - Barrel Storage Area No. 1</b>		
MW-7A-011	Quarterly	Quarterly

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**Table 3 Effectiveness Monitoring Program**

WELL ID	WATER QUALITY SAMPLING	WATER LEVEL ELEVATION
<b>Site 3 - Laundry</b>		
MW-03-003	Semi-annual	Semi-annual
MW-03-018	Semi-annual	Semi-annual
MW-03-025	Semi-annual	Semi-annual
MW-03-407D	Semi-annual	Semi-annual
<b>Site 7A - Barrel Storage Area No. 1</b>		
MW-7A-007	Semi-annual	Semi-annual
MW-7A-012	Semi-annual	Semi-annual
MW-7A-023	Semi-annual	Semi-annual
MW-7A-024	Semi-annual	Semi-annual
<b>Site 6A - MOGAS</b>		
MW-6A-107	Annually	Annually
MW-6A-108	Annually	Annually
MW-6A-116	Annually	Annually
MW-6A-117	Annually	Annually
MW-6A-120	Annually	Annually
MW-6A-121	Annually	Annually
MW-6A-122	Annually	Annually

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**Table 4 Groundwater Protection Standards**

HAZARDOUS CONSTITUENT	GROUNDWATER PROTECTION STANDARD <sup>1</sup> [mg/L]
<b>Site 3 - Laundry</b>	
Tetrachloroethylene	0.005
Trichloroethylene	0.005
cis-1,2-Dichloroethylene	0.07
trans-1,2-Dichloroethylene	0.1
Vinyl Chloride	0.002
Chloroform	0.080
<b>Site 7A - Barrel Storage Area No. 1</b>	
Tetrachloroethylene	0.005
Trichloroethylene	0.005
cis-1,2-Dichloroethylene	0.07
trans-1,2-Dichloroethylene	0.1
Vinyl Chloride	0.002
Carbon Tetrachloride	0.005
Dieldrin <sup>2</sup>	1.8
beta-BHC <sup>2</sup>	0.25
TPH (RRO) <sup>3</sup>	1.1
<b>Site 6A - MOGAS</b>	
Benzene	0.005
Ethylbenzene	0.7
Toluene	1.0
Xylenes (total)	10
2-Methylnaphthalene <sup>2</sup>	0.036
2,4-Dimethylphenol <sup>2</sup>	0.36
Naphthalene <sup>2</sup>	0.00012
Methyl ethyl ketone <sup>2</sup>	5.6

**Notes:**<sup>1</sup> Groundwater Protection Standards reflect the EPA MCLs.<sup>2</sup> No EPA MCL established for this constituent; Groundwater Protection Standard reflects the EPA Human Health RSL (TR=1E-06, THQ=1.0).<sup>3</sup> No EPA MCL or RSL for this constituent; Groundwater Protection Standard reflects the 18 AAC 75 Table C cleanup level.

AAC = Alaska Administrative Code

EPA = U.S. Environmental Protection Agency

MCL = Maximum Contaminant Level

mg/L = milligrams per liter

RSL = Regional Screening Level

THQ = target hazard quotients

TR = target cancer risk



**RCRA Permit No. AK9690330742 Record of Modification (From 2019 Update)**

DATE	DESCRIPTION	REMOVE PAGES	INSERT PAGES
Requested 10/2020	Attachment 3: Personnel Training Outline: <ul style="list-style-type: none"> <li>• Minor editorial updates (formatting, etc.)</li> <li>• No USCG edits received</li> </ul>	Entire Attachment	Entire Attachment
Requested 10/2020	Attachment 4A: Consolidated Post-Closure Plan – Sites 3, 6A, 7A: <ul style="list-style-type: none"> <li>• Reinserted Figures (removed during 2019 update)</li> <li>• Revised corrective actions to reflect AS/SVE contingency-only operation</li> <li>• Revised analytical methods</li> <li>• Revised designated Appendix IX wells</li> </ul> Attachment 4A, Appendix A: RCRA Quarterly Sampling and Analysis Plan: <ul style="list-style-type: none"> <li>• Minor editorial updates (formatting, etc.) to text.</li> <li>• Minor updates to tables, standard operating procedures, and field forms.               <ul style="list-style-type: none"> <li>○ Turbidity stability parameters edited to allow stability at 3 consecutive readings under 10 NTU</li> </ul> </li> <li>• Edits to reduce redundancies with the QAPP</li> <li>• Moved “Health and Safety” to <i>Consolidated Post-Closure Plan</i></li> </ul> Attachment 4A, Appendix B: Post-Closure Groundwater Monitoring Quality Assurance Project Plan: <ul style="list-style-type: none"> <li>• Significant updates (analytical methods, data validation [e.g. application of data flags], etc.) to align with industry standards and updates to permit text.</li> <li>• Table updates to consolidate and clarify information presentation</li> <li>• Edits to reduce redundancies with the SAP</li> <li>• Moved “Organization and Responsibilities” to <i>Consolidated Post-Closure Plan</i></li> </ul>	Entire Attachment	Entire Attachment
		Entire Attachment	Entire Attachment
		Entire Attachment	Entire Attachment
Requested 10/2020	Attachment 4B: Closure Plan for the Hazardous Waste Storage Building (Building N-48): <ul style="list-style-type: none"> <li>• Minor editorial and formatting updates</li> <li>• No USCG edits received</li> </ul>	Entire Attachment	Entire Attachment



