Hazardous Waste Management
RCRA Permit NEVHW0029
January 2026 – Revision 0

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

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

1. SUMMARY

This Permit is a RCRA Hazardous Waste Permit for the operation of a commercial hazardous waste Treatment, Storage and Disposal Facility (TSDF). This Permit covers the storage, treatment, and disposal of waste identified in the Part A Permit Application and managed as described in the Part B Permit Application, both of which are adopted by reference and are attachments to this Permit.

1.1 EFFECT OF PERMIT

1.1.1 The Facility operator, hereafter "the Permittee" is authorized to accept, treat, store, and dispose of hazardous waste at the Facility, and is required to conduct closure and post-closure care and corrective action in accordance with the conditions of this Permit and its attachments. Any acceptance, treatment, storage, or disposal of hazardous waste at the Facility not authorized in this Permit is prohibited. Subject to 40 CFR 270.4, compliance with this Permit during its term generally constitutes compliance, for purposes of enforcement, with Subtitle C of the Resource Conservation and Recovery Act (RCRA), Nevada Revised Statutes (NRS) 459.400 through 459.600, Nevada Administrative Code (NAC) 444.842 through 444.8746, NAC 444.960, and with the Hazardous & Solid Waste Amendments of 1984 (HSWA) except for those requirements not included in the permit, which : (1) become effective by statute; (2) are promulgated under 40 CFR 268 restricting the placement of hazardous wastes in or on the land; (3) are promulgated under 40 CFR 264 regarding the leak detection systems described at 40 CFR 270.4(a)(1)(iii); or (4) are promulgated under Subparts AA, BB or CC of 40 CFR 265 limiting air emissions.

[40 CFR 270.1(c), 270.4]

1.1.2 Issuance of this Permit does not convey any property rights of any sort, nor any exclusive privilege.

[40 CFR 270.4(b), 270.30(g)]

1.1.3 Issuance of this Permit does not authorize any injury to persons or property, any invasion of other private rights, nor any infringement of State, tribal, or local law or regulations.

[40 CFR 270.4(c)]

1.1.4 Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, NRS 459.400 through NRS 459.600; or any other law providing for protection of public health or the environment. Compliance with the terms of this Permit does not relieve the Permittee of its obligation to comply with any other applicable local, state, or federal laws and regulations. *[40 CFR 270.4(a)(1)(i)-(iv)]*

1.1.5 In instances where the Permit and the Permit Application conflict, the most restrictive interpretation takes precedence.

1.1.6 Compliance with the terms of this Permit does not demonstrate compliance with the TSCA Approval issued by the EPA.

1.1.7 Unless set forth specifically otherwise herein, requirements of this Permit apply to all operators of the Facility, who are referred to herein collectively as the "Permittee." Actions by any operator to be compliant with this Permit or that are non-compliant with this Permit constitute an action of all operators (except as otherwise specified). *[40 CFR 264.1(b), 270.1(b)-(c), and 270.10(b)]*

1.1.8 The State of Nevada has adopted 40 CFR Subpart A of Part 2, portions of Subparts A and B of Part 124, Parts 260 through 270, inclusive, by reference in NAC 444.8632 with exceptions listed at NAC 444.86325 and as revised at NAC 444.8633 and NAC 444.8634. Therefore, all references to 40 CFR in this Permit are as they are adopted in NAC 444.8632 through 444.8634.

1.2 PERMIT ACTIONS

1.2.1 Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in 40 CFR 270.41, 270.42, and 270.43. If at any time the Director determines that cause for modification, revocation and reissuance, or termination of the Permit exists under 40 CFR 270.41 or 270.43, the Director may initiate a modification to the Permit, revoke and reissue the Permit, or terminate the Permit in accordance with those sections. The initiation of a modification to the Permit, revocation or reissuance of the Permit, or termination of the Permit does not stay the applicability or enforceability of any Permit Condition. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any Permit Condition. *[40 CFR 124.5(c), 270.4(a) and 270.30(f)]*

1.2.2 Modification of the Permit by the Permittee

As set forth in 40 CFR 270.42, the Permittee may request a modification of the Permit at any time. The filing of a request for a Permit modification or the notification of planned changes on the part the Permittee does not stay the applicability or enforceability of any Permit Condition. Modifications to the Permit do not constitute a reissuance of the Permit.

Modifications and/or updates to information provided in the Part A and B Permit Applications will require the Permittee to file a request for a permit modification. As such, the Permittee must provide information on any modifications and/or updates to the Director. Any changes in hazardous waste operating procedures which are described in the NDEP-approved RCRA Part B Permit Application require approval prior to implementation.

1.2.3 Permit Renewal

This Permit may be renewed as specified in 40 CFR 270.30(b) and Permit Condition 1.5.3. Review of any application for a Permit renewal must consider improvements in the state of control and measurement technology, as well as changes in applicable regulations.

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

1.2.4 Review of Land Disposal Unit Permit

Permit Section 7 (Land Disposal Conditions) and any other Permit Conditions and sections of the

Part B Permit Application containing information related to the permitted landfills shall be reviewed by the Administrator five (5) years after the issuance of this Permit, as specified in 40 CFR 270.50(d). This review may require the Permittee to submit an updated RCRA Permit Application and the Administrator to modify this Permit as described in Permit Condition 1.2.1.

[40 CFR 270.41, 40 CFR 270.50(d)]

1.3 SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or any of the information in the Permit Application that any provision of this Permit may reference, is in any circumstance held invalid, the invalid provision(s) will not affect other Permit provisions, at the Division's discretion, that are uncontested and valid. All other provisions of the Permit remain fully effective and enforceable. *[NRS 459.520, 40 CFR 124.16(a)]*

1.4 DEFINITIONS

For purposes of this Permit, terms used herein shall have the same meaning as those in NAC 444.842 through 444.8746, and 40 CFR Parts 124, 260, 261, 264, 266, 268, and 270, unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. For purposes of this Permit, the definitions listed below will apply:

1.4.1 Action Levels

Health- and environmental-based levels determined by EPA or NDEP to be indicators for protection of human health and/or the environment. Contamination exceeding action levels indicates a potential threat to human health and/or the environment, which may require further study. Action levels are also used as reference points for developing final cleanup standards.

1.4.2 Administrator

The Administrator of the Nevada Division of Environmental Protection (NDEP), a designee or an authorized representative.

1.4.3 Area of Concern (AOC)

Any area having a probable release of a hazardous waste or hazardous constituent, regardless of whether or not the release originated from a Solid Waste Management Unit (SWMU), and is determined by the Division to pose a current or potential threat to human health or the environment.

1.4.4 Bi-Annual

Once every two (2) calendar years.

1.4.5 Cell

A discrete area and volume of a hazardous waste landfill which uses a liner system and dedicated leachate collection and leak detection sumps to provide isolation of wastes from adjacent cells of the landfill. Also, commonly identified as a constructed phase of the landfill.

1.4.6 Certified Laboratory

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

1.4.7 Closure Plan

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

1.4.8 Compliance Period

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

1.4.9 Contamination

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

1.4.10 Corrective Action

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

1.4.11 Current Closure Cost Estimate

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

1.4.12 Current Post-Closure Cost Estimate

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

1.4.13 Days

Calendar days, unless otherwise specified.

1.4.14 Destination Facility for Universal Waste

A facility that treats, disposes of, or recycles a particular category of universal waste, except those management activities described in 40 CFR 273.13(a) and (c) and 40 CFR 273.33(a) and (c).

[40 CFR 273.9]

1.4.15 Director

The Director of the Nevada Department of Conservation and Natural Resources (DCNR), a designee, or an authorized representative.

1.4.16 Discover, Discovery and Discovered

The date on which the Permittee or a Division representative either:

(1) Visually observes evidence of a new SWMU or AOC,

(2) Visually observes evidence of a previously unidentified release of hazardous constituents

to the environment, or

(3) Receives information which suggests the presence of a new release of hazardous waste or hazardous constituents to the environment.

1.4.17 Division

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

1.4.18 Extent of Contamination

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

1.4.19 Facility

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

1.4.20 Hazardous Constituents

Those substances listed in Appendix VIII of 40 CFR 261 and/or Appendix IX of 40 CFR Part 264 or any pollutant as defined in NRS 445A.400.

1.4.21 Hazardous Waste Management Unit (HWMU)

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

1.4.22 In Light Material Service

A container is in light material service if it is used to manage a material for which both of the following conditions apply: The vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20 degrees Celsius; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20 degrees Celsius is equal to or greater than 20 percent by weight. *[40 CFR 265.1081]*

1.4.23 Interim Measures

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

1.4.24 Land Disposal

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

1.4.25 Landfill

Part of the Facility where hazardous waste is or was placed in or on the land and which is not a pile, a land treatment unit, a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground mine, a cave, or a Corrective Action Management Unit (CAMU).

1.4.26 Permit Application

The Part A and Part B RCRA Permit Applications originally dated December 12, 2025, as modified by subsequent amendments that are approved by the NDEP, including all referenced appendices, documents, reports and workplans.

1.4.27 Permittee

The entity (person(s) or corporation) to whom this Permit is issued.

1.4.28 Point of Waste Origination

(1) When the Facility is the generator of the hazardous waste, the point of waste origination means the point where a solid waste produced by a system, process or waste management unit is determined to be a hazardous waste as defined in NAC 444.843.
(2) When the Facility is not the generator of the hazardous waste, the point of waste origination means the point where the Permittee accepts delivery or takes possession of the hazardous waste.

1.4.29 Post-Closure Care Period

A thirty (30) year period beginning when a hazardous waste management unit is certified as closed and during which time the Permittee shall be required to maintain, monitor, and report in accordance with the appropriate requirements of 40 CFR 264 Subparts F, K, L, M, N, and X. The post closure care period is unit specific and may be more or less than thirty (30) years. The Director may modify the post closure care period applicable to a unit if it is found that an extended or reduced period is sufficient to protect human health and the environment.

1.4.30 Post-Closure Plan

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

1.4.31 Qualified Professional Engineer

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

1.4.32 Release

Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing of any hazardous wastes or hazardous constituents into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents). Environment includes the air; therefore, a fire or other unexpected thermal reaction is a release.

1.4.33 Remediation Waste

All solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under 40 CFR 264.100, 264.101 and RCRA Section 3008(h). For a given facility, remediation wastes may originate only from within the facility boundary, but may include waste managed in implementing RCRA Sections 3004(v) or 3008(h) for releases beyond the facility boundary. *[40 CFR 260.10]*

1.4.34 Schedule of Compliance

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

1.4.35 Semiannually

Twice per calendar year.

1.4.36 Solid Waste

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

1.4.37 Solid Waste Management Unit (SWMU)

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

1.4.38 Temporary Unit (TU)

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

1.4.39 Unit

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

1.4.40 Universal Waste (UW)

Any hazardous wastes that are subject to the universal waste requirements of 40 CFR 273, as adopted by NAC 444.8632, including:

1. Batteries as described in 40 CFR 273.2;
2. Pesticides as described in 40 CFR 273.3;
3. Mercury-containing equipment as described in 40 CFR 273.4;
4. Lamps as described in 40 CFR 273.5; and
5. Aerosol cans as described in 40 CFR 273.6.

1.5 DUTIES AND REQUIREMENTS

1.5.1 Duty to Comply

The Permittee must comply with all conditions of this Permit, except that the Permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized by an Emergency Permit issued under 40 CFR 270.61. Any Permit noncompliance, except under the terms of an Emergency Permit, constitutes a violation of the appropriate Act and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *[40 CFR 270.30(a)]*

1.5.2 Compliance Schedules

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

1.5.3 Duty to Reapply

If the Permittee will continue an activity allowed or required by this Permit after the expiration date of this Permit, then the Permittee shall submit a complete application for permit renewal at least one-hundred eighty (180) calendar days prior to this Permit's expiration.

[40 CFR 270.10(h), 270.30(b)]

1.5.4 Permit Expiration

Pursuant to NRS 459.520 (4), this Permit is effective for a fixed term not to exceed ten (10) years. As long as the Division is the Permit-issuing authority, this Permit and all conditions herein will continue in force until the effective date of a new permit if: (i) the Permittee has submitted a timely

new complete application per 40 CFR 270.10(h) which includes information required by 40 CFR 270.13 through 270.28, and for standards in parts 260 through 268, as applicable, for a new permit; and (ii) the Director, through no fault of the Permittee, does not issue a new Permit with an effective date on or before the expiration date of the previous permit. Permits continued under this paragraph remain fully effective and enforceable. *[40 CFR 270.10, 270.50 and 270.51]*

1.5.5 Need to Halt or Reduce Activity Not a Defense

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

1.5.6 Duty to Mitigate

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

1.5.7 Proper Operation and Maintenance

The Permittee must at all times properly operate and maintain the Facility 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 only when necessary to achieve compliance with the conditions of this Permit. *[40 CFR 270.30(e)]*

1.5.8 Permit Actions

This Permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any Permit Condition.

[40 CFR 270.30(f)]

1.5.9 Property Rights

This Permit does not convey any property rights of any sort, nor any exclusive privilege.

[40 CFR 270.30(g)]

1.5.10 Duty to Provide Information

The Permittee must furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee must also furnish to the Director upon request, copies of records required to be kept by this Permit.

[40 CFR 264.74(a), 270.30(h)]

1.5.11 Inspection and Entry

The Permittee must allow the Director, or an authorized representative, upon presenting credentials

and other documents as may be required by law, to: *[40 CFR 270.30(i)]*

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

Notwithstanding any provision of this Permit, the Director retains the inspection and access authority which the Department has under RCRA and other applicable laws.

1.5.12 Monitoring and Records

1.5.12.1 Samples and measurements taken by the Permittee for the purpose of monitoring must be representative of the monitored activity. *[40 CFR 270.30(j)(1)]*

1.5.12.1.1 The sampling and analytical methods used by the Permittee must be appropriate to achieve the applicable data quality objectives established by the Waste Analysis Plan in and the Quality Assurance/Quality Control Plan referenced in Section 7 of the Part B Permit Application. The Permittee shall use the sampling and analysis methods that are referenced in the RCRA regulations, where required. The Permittee shall use representative sampling methods consistent with the most appropriate method from Appendix I of 40 CFR Part 261 and as identified in the Waste Analysis Plan, or an equivalent method approved by the Director.

1.5.12.1.2 Laboratory methods must be those specified in the latest version of EPA manual SW-846: Test Methods for Evaluating Solid Waste, Physical/Chemical Methods – Standard Methods of Wastewater Analysis, or an equivalent method, as specified in the Waste Analysis Plan in Section 7 of the Part B Permit Application. *[40 CFR 264.74(b), 270.31]*

1.5.12.1.3 Both groundwater and soil samples for regulatory monitoring and remedial efforts must be sent to a Nevada-certified laboratory for analyses. As a permitted hazardous waste management facility, the on-site laboratory is not required to be state-certified if the laboratory is solely utilized for the purposes of on-site management of wastes and on-site generated lab results are not utilized to demonstrate environmental or regulatory compliance. *[NRS 459.501]*

1.5.12.2 The Permittee must retain records of all monitoring information required by this Permit (including all calibration and maintenance records and a record of all monitored measurements, data packages including but not limited to digital and original strip chart recordings for continuous monitoring instrumentation), copies of all reports and records required by this Permit, the certification required by 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit, for a period of at least three (3) years from the date of the sample, measurement, report, record, certification, or application. These periods may be extended by request of the Director at any time and are automatically extended during the

course of any unresolved enforcement action regarding this Facility. The Permittee must maintain records from all groundwater monitoring wells and associated groundwater surface elevations for the active life of the Facility and throughout post-closure.

[40 CFR 264.74(b) and 270.30(j)(2)]

1.5.12.3 Records of monitoring information must include, to the extent applicable:

[40 CFR 270.30(j)(3)]

1. The date(s), exact location(s), and time(s) of sampling or measurements;
2. The individual(s) who performed the sampling or measurements;
3. The date(s) analyses were performed;
4. The individual(s) who performed the analyses;
5. The analytical technique(s) or method(s) used; and
6. The results of such analyses.

1.6 REPORTING REQUIREMENTS

1.6.1 Reporting Planned Changes

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

1.6.2 Reporting Anticipated Non-Compliance

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

[40 CFR 270.30(l)(2)]

1.6.3 Certification of Construction or Modification

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

1. The Permittee has submitted to the Director, by certified mail, hand delivery and/or e-mail, a letter signed by the Permittee and a qualified Professional Engineer stating that the Facility has been constructed or modified in compliance with the Permit; and

[40 CFR 270.30(l)(2)(i)]

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

(B) Within fifteen (15) calendar days of the date of submission of the letter in Permit Condition 1.6.3 Item 1, if the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste.

[40 CFR 270.30(l)(2)(ii)(B)]

1.6.4 Transfer of Permits

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

1.6.5 Monitoring Reports

Monitoring results shall be reported at the intervals specified elsewhere in this Permit or as required by a compliance schedule issued pursuant to Permit Condition 1.6.6.

[40 CFR 270.30(l)(4)]

1.6.6 Compliance Schedule Reporting

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

[40 CFR 270.30(l)(5)]

1.6.7 Twenty-Four Hour Reporting

1.6.7.1 The Permittee must report to the Director any noncompliance which may endanger human health or the environment. Any such information must be reported orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. This includes any release[i] to the environment pursuant to 40 CFR 264.196(d); and any fire, unexpected thermal reaction or explosion at or near a permitted unit or hazardous waste management area, even if there is no immediate threat to human health or the environment. The report shall include the following:

1. Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies;
2. Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management Facility, which could threaten the environment or human health; and *[40 CFR 270.30(l)(6)(i)]*
3. Incidents and releases which may endanger human health or the environment, and spills in excess of Reportable Quantities, including all fires and unexpected thermal reactions, shall be reported directly to the NDEP Reporting Hotline at (888) 331-6337 or (775) 687-9485 or https://nevadaenvironmentalactivities.ndep.nv.gov/Spill/ReportForm.aspx.

[i] Pursuant to 40 CFR 264.196(d), a release of one pound or less of hazardous waste that is immediately contained and cleaned-up, need not be reported.

1.6.7.2 The description of the occurrence and its cause shall include:

1. Name, address, and telephone number of the Permittee;
2. Name, address, and telephone number of the Facility;
3. Date, time, and type of incident;
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to the environment and/or human health outside the Facility, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident. *[40 CFR 270.30(l)(6)(ii)]*

1.6.7.3 A written submission shall also be provided to the Director within five (5) days of the time the Permittee first becomes aware of the circumstances. The written submission must contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected, and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Director may waive the five-day written notice requirement in favor of a written report within fifteen (15) days (40 CFR 264.56(i)).

[40 CFR 270.30(l)(6)(iii)]

1.6.8 Manifest Discrepancy Report

If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved within fifteen (15) days after receipt of the waste, the Permittee must submit a letter report, including a copy of the manifest, to the Director[ii]. (See 40 CFR 264.72)

[40 CFR 270.30(l)(7)]

1.6.9 Unmanifested Waste Report

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

1.6.10 Biennial Report

The Permittee must submit a Biennial Report by March 1st of each even numbered calendar year, covering facility activities during the previous calendar year and the information in 40 CFR 264.75. *[40 CFR 270.30(l)(9)]*

1.6.11 Other Noncompliance

The Permittee must report all other instances of noncompliance not otherwise required to be reported above. Any such information must be reported orally within twenty-four (24) hours from

[ii] Beginning on December 1, 2025, if a significant discrepancy cannot be resolved within fifteen (15) days, the Permittee must immediately submit a Discrepancy Report to the EPA e-Manifest system in lieu of supplying the report directly to the Director. The report must describe the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

[iii] Beginning on December 1, 2025, if a shipment arrives without an accompanying manifest, then a Permittee must prepare an electronic Unmanifested Waste Report in the EPA e-Manifest system, in lieu of supplying the report directly to the Director, for submission to the EPA within fifteen (15) days after receiving the waste

the time the Permittee becomes aware of the circumstances. A written report must be submitted within fifteen (15) days and shall contain the information listed in Permit Condition 1.6.7. Written reports should be submitted electronically via e-mail. *[40 CFR 270.30(l)(10)]*

1.6.12 Other Information

Whenever the Permittee becomes aware that the Permittee failed to submit any relevant facts in the Permit Application or submitted incorrect information in the Permit Application or in any report to the Director, the Permittee must promptly submit such facts or information.

[40 CFR 270.30(l)(11)]

1.7 SIGNATORY REQUIREMENT

All applications, reports, or information submitted to or requested by the Director or a designee or authorized representative of the Director shall be signed and certified in accordance with 40 CFR 270.11 and 270.30(k).

1.8 REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DIRECTOR

1.8.1 Except as provided in Permit Condition 1.8.3, all reports, correspondence, notifications or other submissions that require a wet signature and/or meet the submission requirements as set forth by the NDEP-BSMM and are required by this Permit to be submitted to the Director must be sent to the addressee shown below, or provided electronically, and must be **received by** the specified due date:

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

1.8.2 All deliverables submitted in paper form pursuant to Permit Condition 1.8.1 must also be submitted in electronic format to the addressee identified in Permit Condition 1.8.3.

1.8.3 All reports, correspondence, notifications, or other submissions required by this Permit that do not require a wet signature and are required by this Permit to be submitted to the Director must be submitted by electronic mail to an email address provided by the NDEP-BSMM.

1.8.4 Submittals which are not received within ten (10) days after the specified due date will be considered an instance of noncompliance with applicable conditions of this Permit, unless the Permittee can demonstrate (e.g., certified mail receipt, etc.) that the submittal was sent in a timely manner and that failure of deliverables to arrive on schedule was beyond control of the Permittee.

1.9 CONFIDENTIAL INFORMATION

In accordance with 40 CFR 270.12, the Permittee may claim information required to be submitted by this Permit as entitled to confidential treatment at the time of submittal. If the Permittee asserts such a claim, the information will be treated in accordance with the procedures in 40 CFR Part 2. If no claim is made at the time of submission, the information may be made available to the public without further notice. *[40 CFR Part 2, Subpart B and 270.12]*

1.10 DOCUMENTS TO BE MAINTAINED AT THE FACILITY

1.10.1 In addition to the Permit, Permit Application and any modification thereof, the Permittee must maintain at the Facility, or an approved location identified in the Permit Application, until closure is completed and certified by an independent qualified Professional Engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by 40 CFR 264.13 and this Permit;
2. Inspection Schedules, as required by 40 CFR 264.15(b)(2) and this Permit;
3. Personnel Training Documents and Records, as required by 40 CFR 264.16(d) and this Permit, although training records on former employees must be kept for at least three (3) years from the date the employee last worked at the Facility in accordance with 40 CFR 264.16(e);
4. Contingency Plan, as required by 40 CFR 264.53(a) and this Permit;
5. Operating Record, as required by 40 CFR 264.73 and this Permit;
6. Closure Plan, as required by 40 CFR 264.112(a) and this Permit;
7. Post-Closure Plan, as required by 40 CFR 264.118(a) and this Permit;
8. Annually-adjusted Cost Estimate for Facility closure & post-closure, as required by 40 CFR 264.142(d) & 264.144(d), respectively, and this Permit;
9. Facility Operations Plan, as required by the TSCA Approval;
10. All Groundwater Monitoring Records, inclusive of installation details for all wells, as required by this Permit or otherwise;
11. Corrective Action Plans and documents implementing Corrective Action for Solid Waste Management Units at the Facility as required by 40 CFR 264.101 and this Permit, including, as required, RCRA Facility Assessments, RCRA Facility Investigations, Corrective Measures Studies, Remedy Selection Document, and others as specified in the Permit;
12. All instances of implementation of the Contingency Plan;
13. A copy of the current completeness determination and current approved Permit Application including all appendices and attachments;
14. All correspondence between the Division and the Facility related to changes or modifications to this Permit or notifications of noncompliance and all inspection reports; and
15. Unusual Occurrence Reports (examples: all manifest discrepancies, deficiencies found as a result of an inspection, all releases whether contained by secondary containment or not, all injuries to personnel, all activations of the alarm system, any non-compliance with this

Permit, etc.);

16. All other documents required to be maintained for the active life of the Facility in accordance with the requirements of this Permit and regulations.

1.10.2 For the purposes of the requirement that records be maintained "at the Facility or at an approved location identified in the Permit Application" in accordance with this Permit Condition, except for the Contingency Plan, such records may be maintained in either hardcopy at the Facility or electronic format, provided they are made available to and are readily accessible to the Division and EPA for the period that applies to the record.

1.10.3 All records, including plans, required under this Permit must be furnished upon request, and made available at all reasonable times for inspection by any officer, employee, or representative of the Division and EPA who is duly designated by the Director *[40 CFR 264.74(a)]*

1.11 INFORMATION REPOSITORY

1.11.1 The Permittee must establish and maintain at the Facility an Information Repository created in support of all Permit Applications, renewals and modifications pursuant to 40 CFR 124.33(c) through (f) for the life of the Facility. The Information Repository must include, but is not limited to, the following records: *[40 CFR 270.30(m)]*

a. Final Permit and Attachments;
b. Current Approved Permit Application including appendices and attachments;
c. Any pending requests for Permit Modifications or Renewal;
d. All Final Permit Modifications;
e. Any documents such as Performance Demonstration Test (PDT) Work Plans, PDT Reports, and Human Health and Ecological Risk Assessment Updates, approved by the Director in the preceding three (3) years; and
f. Final Division and EPA RCRA Inspection Reports for the preceding three (3) years.

1.11.2 The Information Repository must be located and maintained at a site chosen by the Permittee and approved by the Director. *[40 CFR 124.33(d) and 270.30(m)]*

1.11.3 The Permittee must update the Information Repository with appropriate information when permit events take place (e.g., permit modifications), and at least every five (5) years throughout the life of this Permit. Records maintained in the Information Repository need only be maintained for the periods of time otherwise required by this Permit. *[40 CFR 124.33(f) and 270.30(m)]*

1.11.4 Notice of the location of the Information Repository must be sent to all persons on the Facility mailing list. *[40 CFR 124.33(e) and 270.30(m)]*

1.12 PERMIT COMPLIANCE SCHEDULES

The Permittee must comply with the Compliance Schedules located in specific sections of this Permit. The Permittee shall certify accomplishment of an item listed in a Compliance Schedule in

a written notice to the Director within five (5) calendar days of accomplishing each item listed in the compliance schedule. *[40 CFR 270.33]*

2. SUMMARY

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

2.1. GENERAL FACILITY DESCRIPTION

The Facility is a commercial hazardous waste Treatment, Storage and Disposal Facility (TSDF). The wastes identified in the Part A Permit Application may be stored, treated, disposed of, and managed at the Facility, as described in the Part B Permit Application. The Part A and B Permit Applications, jointly referred to as the Permit Application, are adopted by reference and are attachments to this Permit. Wastes managed include RCRA hazardous waste, polychlorinated biphenyl waste, state-designated hazardous waste and non-hazardous waste. Bulk or containerized wastes may be received, stored, processed, and, when the waste meets the Land Disposal Restriction (LDR) requirements, disposed of at the Facility. The Permittee is currently required to conduct groundwater monitoring, leachate monitoring and soil vapor extraction at the Facility. Since the Facility includes land disposal units, it will not be clean-closed and will require post-closure care.

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

2.1.1. The Permittee is authorized to accept, treat, store, dispose of, or manage the hazardous wastes listed in this Permit in, and only in, the hazardous waste management units (HWMUs) and solid waste management units (SWMUs) described in Permit Sections 3 through 7A, subject to the terms of this Permit. *[40 CFR 270.13(j)]*

2.2. PERMITTED AND PROHIBITED WASTES

2.2.1. Permitted Waste Management

The Permittee may receive, treat, store, dispose of, or otherwise manage only those hazardous wastes identified in Permit Condition 2.1 in the hazardous waste management units (HWMUs) described below, as specified in this Permit and subject to the terms of this Permit. *[40 CFR 270.13(j)]*

Storage of waste and the hazardous waste storage units are described in Permit Sections 3 (Container Management Conditions), 4 (Tank Storage Conditions) and 7A (Waste Pile Conditions); treatment of waste and the treatment tanks are described in Permit Section 5 (Tank Treatment Conditions); grinding of pool cleaning waste and the Waste Grinder are described in Permit Section 6 (Subpart X Unit Conditions); and land disposal of waste and the landfills are described in Permit Section 7 (Landfill Disposal Conditions). The Facility also accepts waste that may be subject to 40 CFR 264 Subpart AA, BB and CC with requirements identified in Permit Section 9 (Organic Air Emissions Conditions). The groundwater monitoring required, at the time

this permit was issued, is described in Permit Sections 10 (Groundwater Detection Monitoring) and 11 (Groundwater Compliance Monitoring). The requirements for waste minimization, corrective action, post-closure and financial assurance are described in Permit Sections 8 (Waste Minimization Conditions), 12A (Corrective Action Conditions for Regulated Units), 12B (Corrective Action Conditions for SWMU & AOC), 13 (Post-Closure Care) and 14 (Financial Assurance Conditions), respectively. The Permittee also operates an aerosol can recycling unit which is exempt from hazardous waste permitting. A map showing the facility layout and location of the hazardous waste management units (HWMUs) is provided in Figure 1-3 of the Part B Permit Application. All regulations cited in this Permit refer to regulations in effect and as adopted by the State of Nevada on the date of issuance of this Permit. The Permittee is to maintain compliance with the conditions contained in this Permit and any self-implementing regulations promulgated after issuance.

2.2.2. Prohibited Waste Management

The Permittee is prohibited from receiving, treating, storing, disposing of, or otherwise managing the following materials:

1. Waste that is not identified as "permitted" in:
   (a) Permit Condition 3.3;
   (b) Permit Condition 4.2;
   (c) Permit Condition 5.2;
   (d) Permit Condition 6.2;
   (e) Permit Condition 7.2; or
   (f) Permit Condition 7A.3;
2. Any radioactive material that is not exempt from regulation and licensing or is not expressly authorized for storage, treatment or disposal under this Permit, or any radioactive or nuclear waste material, which requires specific licensing or permitting under any other rules of state or federal authorities for disposal or transshipment;
3. Compressed gases or pressurized gases which are a hazardous waste (not to include retail aerosol containers, retail propane/butane cylinders of 50 gallons or less, or automotive struts);
4. Class 1, Division 1.1 or 1.2, or forbidden explosives (49 CFR Part 173.50), or any explosive material, as defined by USDOT under 49 CFR Part 173;
5. Biological Agents, Etiologic Agents or infectious wastes;
6. Bulk liquids for direct disposal, or containerized liquids (except lab packs) for direct disposal; or bulk hazardous liquids to which absorbents have been added for direct disposal (use of liquids as dust suppression in accordance with Section 10.8.10 of the Part B Permit Application is not considered disposal under this section);
7. Reactive material as defined in 40 CFR Part 261.23, that is not treated to meet the requirements of 40 CFR Part 268 prior to disposal;
8. Liquid organic peroxides with concentration exceeding 5% by volume;

   [NDEP-USEN e-mail dated January 9, 2008]
9. Containerized liquids (Lab packs) with biodegradable absorbents (40 CFR 264.316(b)); or

10. The hazardous waste described as "prohibited" in:
    (a) Permit Condition 3.3;
    (b) Permit Condition 4.2;
    (c) Permit Condition 5.2;
    (d) Permit Condition 6.2;
    (e) Permit Condition 7.2 or
    (f) Permit Condition 7A.3.

2.3. REQUIRED NOTICES

2.3.1. Hazardous Waste Imports

The Permittee must submit notice, electronically using EPA's Waste Import Export Tracking System (WIETS), of hazardous wastes received from foreign sources in accordance with the requirements in 40 CFR 264.12(a), must comply with the imports of hazardous waste requirements in 40 CFR 262.84, and the use of the manifest system requirements of 40 CFR 264.71(a)(3) and 264.71(d). *[40 CFR 264.12(a)]*

2.3.2. Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), the Permittee must inform the generator in writing that the Permittee has the appropriate hazardous waste permit(s) for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the Facility's Operating Record in accordance with 40 CFR 264.73. *[40 CFR 264.12(b)]*

2.4. GENERAL WASTE ANALYSIS

The Permittee must comply with the waste analysis requirements of 40 CFR 264.13, follow the Waste Analysis Plan procedures in Section 7 of the Part B Permit Application, the Quality Assurance Plan procedures in the USEN Laboratory QA/QC Plan, and the conditions listed below:

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

2.4.2. Waste Stream Review

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

1. A completely filled-out Waste Profile Form (WPF), including any Land Disposal

Certification (LDR), signed by the generator or authorized agent;
2. A Technical Review Sheet (TRS); and
3. Other information as requested by the Director.

2.5. SECURITY

The Permittee must comply with the security provisions of 40 CFR 264.14 and the Security Plan in Section 3 (Security Plan) of the Part B Permit Application.

2.5.1. The Permittee must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of the Facility in accordance with Section 3 (Security Plan) of the Part B Permit Application. *[40 CFR 264.14(a)]*

2.5.2. The Facility must control after-hours entry by security guards and locked Facility entrance gates, as specified in Section 3 (Security Plan) of the Part B Permit Application. *[40 CFR 264.14(b)]*

2.5.3. The Permittee must post at each entrance to the active portion of the Facility a sign that says "Danger – Unauthorized Personnel Keep Out." The sign must be written in the English language and other language(s) as appropriate. The sign must be legible from a distance of at least twenty-five (25) feet. *[40 CFR 264.14(c)]*

2.6. GENERAL INSPECTION REQUIREMENTS

2.6.1. The Permittee must inspect the Facility for malfunctions and deterioration, operator errors, and discharges which may be causing – or may lead to (1) release of hazardous waste constituents to the environment or (2) a threat to human health. The Permittee must conduct these inspections in accordance with the Inspection Plan, Section 4 (Facility Inspection Plan) of the Part B Permit Application to identify problems in time to correct them before they harm human health or the environment. *[40 CFR 264.15(a)]*

2.6.2. The Permittee must follow the written schedule ("inspection schedule") for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important for preventing, detecting, or responding to environmental or human health hazards in accordance with Section 4.1.2 (Frequency of Inspections) of the Part B Permit Application. The Permittee must maintain a copy of this written inspection schedule with the Inspection Plan at the Facility. *[40 CFR 264.15(b)(1) and (b)(2)]*

2.6.3. The inspection form and instructions must identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection in accordance with the written Inspection Plan, Section 4 (Facility Inspection Plan) of the Part B Permit Application. The inspection form must state the frequency of inspection for each item. The frequency of inspection of the units identified in Table 4-1 of the Part B Permit Application must be based on the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections.
[40 CFR 264.15(b)(3) and (b)(4)]

2.6.4. The Inspection Plan must include at a minimum, the items and inspection frequencies identified in 40 CFR 264.174, 264.193, 264.195, 264.254, 264.303, 264.602, and 264.1063.

[40 CFR 264.15(b)(4)]

2.6.5. The Permittee must remedy any deterioration or malfunction of equipment or structures identified during the inspection, on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, the Permittee must take remedial action immediately in accordance with the Contingency Plan in Section 6 of the Part B Permit Application. *[40 CFR 264.15(c), 40 CFR 264 Subpart D]*

2.6.6. The Permittee must record inspections in an inspection log or form in the Facility's operating record available upon request. The Permittee must retain these records of inspection for at least three (3) years from the date of inspection. At a minimum, the inspection record must include the date and time of the inspection, name of the inspector, notations of the observations or monitor measurement for each item inspected, and the date and nature of any repairs or other remedial action to address the inspection observation. *[40 CFR 264.15(d)]*

2.7. PERSONNEL TRAINING

The Permittee must conduct personnel training, as required by 40 CFR 264.16. This training program must follow the Personnel Training Program procedures in Section 5 (Personnel Training Program) of the Part B Permit Application and maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

2.7.1. Training Program

2.7.1.1. Facility Personnel

Facility personnel, including any operators or contractors, must successfully complete a training program for their position and responsibilities at the Facility, in accordance with Section 5 (Personnel Training Program) of the Part B Permit Application.

[40 CFR 264.16(a)(1)]

2.7.1.2. Instructor Qualifications

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

2.7.1.3. Emergency Response

2.7.1.3.1. At a minimum, the training program must be designed to ensure that Facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems in accordance with Section 5 (Personnel Training Program) of the Part B Permit Application, including, where applicable:

[40 CFR 264.16(a)(3)]

1. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

2. Key parameters for automatic waste feed cut-off systems;
3. Communications or alarm systems;
4. Response to fires or explosions;
5. Response to ground-water contamination incidents; and
6. Shutdown of operations.

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

2.7.2. Training Schedule

Facility personnel must successfully complete the Facility's training program for their position in accordance with Permit Condition 2.7.1 and Section 5 of the Part B Permit Application within six (6) months after the date of their employment or assignment to the Facility, or to a new position at the Facility, whichever is later. Newly hired employees must not work in unsupervised positions until they have successfully completed the training requirements in Permit Conditions 2.7.1.1 through 2.7.1.3, above. *[40 CFR 264.16(b)]*

2.7.3. Annual Review

Facility personnel must take part in an annual review of the material included in their initial training, see Permit Condition 2.7.1, above. The Permittee must document that each Facility employee has completed this annual review of the initial training compliant with this Permit and Section 5 of the Part B Permit Application in the Facility's operating record. If the review identifies any changes in the training program necessary to remain in compliance with this Permit, the Permittee must request a permit modification indicating the necessary revisions to the training program in the Part B Permit Application within thirty (30) days of the review.

[40 CFR 264.16(c)]

2.7.4. Documentation

The Permittee must record both introductory and continuing training that is given to each person related to hazardous waste management in the employee's personnel record. Training records must include a description of the type and amount of the training, including training content, date of training, total training hours for the training date, certification date as applicable, other relevant training information like the name of the instructor or training provider and their qualification to instruct the training event, and the following: *[40 CFR 264.16(d)]*

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

4. Records that document that the training or job experience required under Permit Conditions 2.7.1, 2.7.2 and 2.7.3, above, has been given to, and completed by, facility personnel.

2.7.5. Recordkeeping

The Permittee must maintain and keep training documents on current personnel at the Facility in accordance with 40 CFR 264.16(d) and (e), Section 5 of the Part B Permit Application and Permit Condition 1.10.1 Item 3. Training records on former employees must be kept for at least three (3) years from the date the employee last worked at the Facility. Personnel training records may accompany personnel transferred within the same company. *[40 CFR 264.16(e)]*

2.8. SPECIAL PROVISIONS

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

2.8.1.1. The Permittee must take precautions, as documented in Sections 8.25 and 8.26 (Container Management) and Section 9.9 (Tank Systems) of the Part B Permit Application, to prevent accidental ignition or reaction of ignitable or reactive waste. The Permittee must separate and protect ignitable and reactive waste from sources of ignition or reaction including but not limited to open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the Permittee must confine smoking and open flame to specially designated locations. The Permittee must conspicuously place "No Smoking" signs wherever there is a hazard from ignitable or reactive waste.
[40 CFR 264.17(a)]

2.8.1.2. The Permittee must take precautions to prevent reactions which generate extreme heat or pressure, fire or explosions, or violent reactions; produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment; produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; damage the structural integrity of the device or Facility; and through other like means threaten human health or the environment. *[40 CFR 264.17(b)]*

2.8.1.3. The Permittee must demonstrate compliance with Permit Conditions 2.8.1.1 and 2.8.1.2 in the Facility's operating records. This documentation may be based on references to published scientific or engineering literature, data from trial tests (e.g., bench scale or pilot scale tests), waste analyses (as specified in 40 CFR 264.13), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions. *[40 CFR 264.17(c)]*

2.8.2. Special Provisions for State-Hazardous Waste

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

2.8.2.2. Waste originally designated as hazardous waste in its state of origin must be manifested as hazardous waste when shipped offsite, unless it has been treated at the Facility and is demonstrated to be non-hazardous through subsequent waste determination, using methods described in the Waste Analysis Plan in Section 7 of the Part B Permit Application.

2.8.3. Special Provisions for Universal Waste

2.8.3.1. The Permittee must manage all waste that is designated as universal waste at its point of origin (i.e. generator) [see 40 CFR 273.60] as hazardous waste. This must be done in accordance with the terms of this permit, upon acceptance, when brought to the Facility for:

(a) Storage and/or treatment while at the Facility; or

(b) Only storage until the waste leaves the Facility under its original Bill of Lading or a new Bill of Lading.

2.8.3.2. Universal waste must be treated and shown to meet the Land Disposal Restriction (LDR) requirements before it is placed in a landfill at the Facility. *[RO 14088]*

2.8.4. Special Provisions for Household Hazardous Waste (HHW) that are exempt under 40 CFR 261.4(b)(1)

2.8.4.1. The Permittee must manage all waste that is designated as HHW at its point of origin as hazardous waste while it is onsite. This must be done in accordance with the terms of this permit, upon acceptance, when brought to the Facility for:

(a) Storage, and/or treatment while at the Facility; or

(b) Only storage until the waste leaves the Facility under its original Bill of Lading or a new Bill of Lading.

2.8.4.2. HHW must be treated and shown to meet the Land Disposal Restriction (LDR) requirements before it is placed in a landfill at the Facility.

2.8.5. Special Provisions for Very Small Quantity Generator (VSQG/CESQG) Wastes that are exempt under 40 CFR 262.14

2.8.5.1. The Permittee must manage all waste that is designated as exempt because it came from a VSQG/CESQG as hazardous waste while it is onsite. This must be done in accordance with the terms of this permit, upon acceptance, when brought to the Facility for:

(a) Storage, and/or treatment while at the Facility; or

(b) Storage until the waste leaves the Facility under its original Bill of Lading or a new Bill of Lading.

2.8.5.2. Waste that is designated as exempt because it is coming from a VSQG/CESQG must be treated and shown to meet the Land Disposal Restriction (LDR) requirements before it is placed in a landfill at the Facility.

2.9. CONSTRUCTION QUALITY ASSURANCE PROGRAM

2.9.1. The Permittee must maintain a construction quality assurance (CQA) program and implement their written CQA plan compliant with 40 CFR 264.19 in Section 7.9 (Quality Assurance/Quality Control) of the Part B Permit Application. Requirements under the CQA for specific units are referenced in the unit-specific sections of this Permit and the Permit Application.

[40 CFR 264.19]

2.10. PREPAREDNESS AND PREVENTION

2.10.1. Required Equipment

At a minimum, the Permittee must maintain at the Facility the particular kinds of equipment required by 40 CFR 264.32 and as set forth in the Contingency Plan (Section 6 of the Part B Permit Application).

2.10.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Permit Condition 2.10.1, as necessary, to assure its proper operation in time of emergency (see inspection schedule in Table 4-1 in Section 4 of the Part B Permit Application), as required by 40 CFR 264.33.

2.10.3. Access to Communications or Alarm System

2.10.3.1. Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee. *[40 CFR 264.34(a)]*

2.10.3.2. If there is ever just one employee on the premises while the Facility is operating, the employee must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio; capable of summoning external emergency assistance. *[40 CFR 264.34(b)]*

2.10.4. Required Aisle Space

The Permittee must maintain aisle space[i] to facilitate inspections and allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency and comply with the International Fire Code (IFC) that is adopted by Nye County. *[40 CFR 264.35]*

2.10.5. Arrangements with Local Authorities

The Permittee must maintain, as required by 40 CFR 264.37, the arrangements with State and local authorities described in Section 6.5 (Plan Distribution / Coordination Agreements) of the Part B Permit Application. If any State or local officials decline to enter into such arrangements, the Permittee must document this refusal in the Operating Record. *[40 CFR 264.37]*

[i] Aisle space must be a minimum of three (3) feet between container rows in the Container Management Units (CMUs), as described in Section 8.2.3.2 (Storage and Labeling) of the Part B Permit Application.

2.11. CONTINGENCY PLAN

The Permittee must have and maintain a Contingency Plan for the Facility which complies with 40 CFR 264.52 and is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste.
[40 CFR 264.51(a)]

2.11.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the RCRA Contingency Plan, Section 6 (RCRA Contingency Plan) of the Part B Permit Application, whenever there is a fire, unexpected thermal reaction, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. This includes any release[ii] to the environment pursuant to 40 CFR 264.196(d); and any fire, unexpected thermal reaction or explosion at or near a permitted unit or hazardous waste management area, even if there is no immediate threat to human health or the environment. *[40 CFR 264.51(b)]*

2.11.2. Copies of Plan

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

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

2.11.3. Amendments to Plan *[40 CFR 264.54]*

The Contingency Plan must be reviewed and immediately amended, if necessary, whenever:

1. The Facility Permit is revised;
2. The plan fails in an emergency;
3. The Facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents;
4. The response necessary in an emergency changes;
5. The list of emergency coordinators changes; or
6. The list of emergency equipment changes.

2.11.4. Emergency Coordinator

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

2.11.4.1. The Emergency Coordinator must comply with the emergency procedures described in 40 CFR 264.56 and Section 6.2 (Implementation of the Facility Contingency Plan) of the Part B Permit Application. *[40 CFR 264.56]*

[ii] Pursuant to 40 CFR 264.196(d), a release of one pound or less of hazardous waste that is immediately contained and cleaned-up, need not be reported.

2.12. MANIFEST SYSTEM

The Permittee must comply with the manifest requirements of 40 CFR 264.71, 264.72 and 264.76 and NAC 444.8666(1)[iii] and follow the procedures in Section 7.6.6 (Waste Manifest Review & Discrepancy Resolution) of the Part B Permit Application, consistent with:*[40 CFR 264.71 and 264.72]*

1. Signing and dating each copy of the manifest to certify that the hazardous waste covered by the manifest was received[iv];
2. Noting any significant discrepancies in the manifest, as defined below, on each copy of the manifest:
   a. Waste Types – Manifest discrepancies between the type of hazardous waste designated on the manifest or shipping paper, and the type of hazardous waste the Facility actually receives, or obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper; or
   b. Waste Quantities – For bulk waste, variations greater than ten (10) percent in weight, for batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload.
3. Immediately giving the transporter at least one copy of the signed manifest;
4. Within thirty (30) days after the delivery, sending a copy of the manifest to the generator;
5. Within thirty (30) days after the delivery of imported hazardous waste, sending a copy of the manifest to the EPA, as described in 40 CFR 264.71(a)(3);
6. Retaining at the Facility a copy of each manifest for at least three (3) years from the date of delivery; and
6. Complying with the manifest discrepancies requirements of 40 CFR 264.72 by reconciling the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within fifteen (15) days after receiving the waste, the Permittee must immediately submit to the Director a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper.

2.13. RECORDKEEPING AND REPORTING

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

2.13.1. Operating Record

2.13.1.1. The Permittee must maintain a written operating record at the Facility in accordance with the Permit Application and as required in 40 CFR 264.73. *[40 CFR 264.73]*

2.13.1.2. The Permittee must maintain at the Facility copies of waste minimization documents required

[iii] Compliance with EPA's new Hazardous Waste Electronic Manifest (*e*-Manifest) System and User Fee Final Rule [*https://www.gpo.gov/fdsys/pkg/FR-2018-01-03/pdf/2017-27788.pdf*] is required.

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

in Permit Section 8 and must make them available to any authorized representative of the Division or USEPA conducting an inspection. *[40 CFR 264.74]*

2.13.2. Quarterly Volume Reports and Fees

The Permittee shall submit to the Director a detailed volume fee breakdown report along with the quarterly volume fees due and the e-payment receipt within thirty (30) days after the end of each calendar quarter. *[NAC 444.8452]*

2.13.2.1. The Permittee shall submit to the Director a draft detailed volume fee breakdown report along with the draft quarterly volume fee amounts within fifteen (15) days after the end of each calendar quarter.

2.13.3. Annual Fees

2.13.3.1. Annual Permit Fee – The Permittee shall, on or before March 1 of each year, pay to the Division the annual permit fee. *[NAC 444.845]*

2.13.3.2. Annual Operating Agreement Fee – The Permittee shall, on or before January 31 of each year, pay to the Division the agreed to Annual Operating Agreement Fee.

2.13.4. Annual Report

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

1. The Facility's EPA identification number, name, and address;
2. The calendar year covered by the report;
3. For each waste stream (including shipments from foreign generators) received by the Permittee during the previous calendar year:
   a. The EPA identification number of each generator from which a waste stream was received;
   b. A description and quantity (in tons and cubic feet); and
   c. The methods of treatment, storage, and/or disposal for each waste stream received, as well as, generated;
4. The most recent closure and post-closure cost estimates (including a summary of cost for each unit);
5. A description of the waste minimization efforts[v] undertaken during the previous year to reduce the volume and toxicity of wastes generated by the Permittee, including a description of the changes in volume and toxicity of waste actually achieved during the year, in comparison to previous years;
6. A detailed listing and description of all rejected/denied shipments during the year;
7. Unusual Occurrence Report – Incidents, as described in Permit Condition 1.10.1(15), for the Facility during the year;
8. The results of tank integrity assessments completed during the year;

[v] See waste minimization and source reduction requirements in Permit Conditions 8.2 and 8.3.

9. Reports, as applicable, required under 40 CFR 264.1065 pertaining to all equipment subject to Subpart BB standards;
10. Test results for sampling the liquid and solid phases in the Evaporation Pad, as described in Permit Condition 5.7.6;
11. Survey results for the elevation of the closure caps of the closed landfills, as described in Permit Condition 13.3.6;
12. Detailed Annual Lysimeter Performance Report. (A list of the required contents has been provided to the Facility and a copy is available upon request); and
13. A certification statement, as required by 40 CFR 270.11(d), signed by the Facility manager or an authorized representative.

2.13.5. Biennial Report

The Permittee must comply with the reporting requirements of 40 CFR 264.75 by submitting a report to the Division by March 1st of each even numbered year for the previous operating year.

2.14. GENERAL CLOSURE REQUIREMENTS

2.14.1. Closure Plan

The Permittee must maintain a written Closure Plan that contains the information described in 40 CFR 264.112(b) and is approved by the Director. *[40 CFR 264.112(a)]*

2.14.2. Performance Standard

The Permittee must close the Facility, as required by 40 CFR 264.111 and in accordance with the approved Closure Plan in Section 15 (Scheduled Closure Plan) of the Part B Permit Application.

2.14.3. Amendment to Closure Plan

The Permittee must submit a written request for a permit modification, as described in 40 CFR 264.112(c) and Permit Condition 1.2.1, for any changes in the approved closure plan.

[40 CFR 264.112(c)]

2.14.4. Notification of Closure

The Permittee must notify the Director in writing at least sixty (60) days prior to the date on which the Facility expects to begin partial or final closure of the Facility, and must fulfill the requirements of 40 CFR 264.112(d).

2.14.5. Time Allowed for Closure

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

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

The Permittee must decontaminate or ship offsite, to an authorized treatment or disposal site, all contaminated equipment, structures, and soils, as required by 40 CFR 264.114 and the approved Closure Plan. In the event not all structures, soils or equipment can be decontaminated or shipped offsite, the Permittee shall close the Facility and provide post-closure care in accord with 40 CFR 264 Subparts G, J, N and X.

2.14.7. Certification of Closure

The Permittee must certify, as required by 40 CFR 270.11(d), that a portion or all of the Facility has been closed in accordance with the specifications in the Closure Plan (Section 15 of the Part B Permit Application) and as required by 40 CFR 264.115. This certification must be submitted to the Director within sixty (60) days of completion of the closure.

2.14.8. Survey Plat

The Permittee must submit to the local land use authority, and to the Director, upon submission of the certification of closure of each hazardous waste disposal unit, a survey plat indicating the waste disposal locations and dimensions, with respect to permanently surveyed benchmarks, as required by 40 CFR 264.116. This plat must be prepared and certified by a professional land surveyor and must contain a note, prominently displayed, which states the Permittee's obligation to restrict disturbance of the hazardous waste disposal unit in accordance with the applicable 40 CFR 264 Subpart G regulations.

2.15. GENERAL POST-CLOSURE REQUIREMENTS

2.15.1. Post-Closure Plan

The Permittee must maintain a written Post-Closure Plan that contains the information described in 40 CFR 264.118(b) and is approved by the Director. *[40 CFR 264.118(a)]*

2.15.2. Post-Closure Care Period

The Permittee must begin post-closure care for each landfill after completion of closure of the unit and continue post-closure care for at least thirty (30) years after that date. Post-closure care must be as required by 40 CFR 264.310(b) and in accordance with the approved Post-Closure Care Plan (Section 17 of the Part B Permit Application).

2.15.3. Post-Closure Care Security

The Permittee must maintain security at the Facility during the post-closure care period as required by 40 CFR 264.117(b) and in accordance with the approved Post-Closure Care Plan (Section 17 of the Part B Permit Application).

2.15.4. Amendment to Post-Closure Plan

The Permittee must submit a written request for a permit modification, as described in 40 CFR 264.118(d) and Permit Condition 1.2.1, for any changes in the approved post-closure plan.

[40 CFR 264.118(d)]

2.15.5. Post-Closure Notices

2.15.5.1. No later than sixty (60) days after certification of closure of each hazardous waste disposal unit, the Permittee must submit to the local land use authority and to the Director records of the type, location, and quantity of hazardous waste disposed of within each cell or disposal unit, in accordance with 40 CFR 264.119(a).

2.15.5.2. Within sixty (60) days of certification of closure of each hazardous waste disposal unit, the Permittee must submit:

1. A request to the Director and the Nevada Division of State Lands to record a notation on the deed (or other instrument normally examined during title search regarding the Facility property), in accordance with 40 CFR 264.119(b)(1); and
2. A certification, signed by the Permittee, that the notation specified in 40 CFR 264.119(b)(1) has been recorded, including a copy of the document in which the notation has been placed, to the Director.

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

2.15.6. Certification of Completion of Post-Closure Care

The Permittee must certify, as required by 40 CFR 270.11(d), that the post-closure care period was performed in accordance with the specifications in the approved Post-Closure Care Plan (Section 17 of the Part B Permit Application), as required by 40 CFR 264.120. This certification must be submitted to the Director within sixty (60) days of completion of the post-closure care period.

2.16. FINANCIAL REQUIREMENTS FOR CLOSURE AND POST-CLOSURE

The Permittee must comply with the conditions in Permit Section 14 for financial assurance requirements and cost estimates.

2.17. LIABILITY REQUIREMENTS

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

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

The Permittee must comply with 40 CFR 264.148, whenever the conditions of the cited regulation applies.

2.19. COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

Task		Date Due
1	The Permittee shall **modify** the WAP to include details for when analyses are not required and what details are	Within 90 days of the

	used to determine that a 'continued' waste has changed enough to require a new analysis and waste profile (i.e. provide frequency and triggers for verification analyses); and **submit** the modified WAP to the Division for review and approval.	effective date of this Permit
2	The Permittee shall **modify** the WAP to indicate when the waste analysis will be done by the Permittee versus when it must be provided by the generator and/or an independent laboratory; and **submit** the modified WAP to the Division for review and approval.	Within 90 days of the effective date of this Permit
3	The Permittee shall **modify** the WAP to include analyses of all waste being sent offsite, even if received waste was received from an offsite generator; and **submit** the modified WAP to the Division for review and approval.	Within 90 days of the effective date of this Permit
4	The Permittee shall **modify** the WAP to identify which specific facility staff will make "waste acceptance determinations" and their qualifications; and **submit** the modified WAP to the Division for review and approval.	Within 90 days of the effective date of this Permit
5	The Permittee shall **modify** the WAP to include a description of how high energy density batteries (i.e. LIBs) will be managed; and **submit** the modified WAP to the Division for review and approval.	Within 90 days of the effective date of this Permit
6	The Permittee shall **modify** the WAP to include the criteria and procedures used to determine when to activate the Contingency Plan for all incoming shipments, waste transport (i.e. rejected waste is unsafe to transport) and waste analysis; including how the Contingency Plan will be used to address shipments of waste (i.e. damaged containers); and **submit** the modified WAP to the Division for review and approval.	Within 90 days of the effective date of this Permit
7	The Permittee shall **confirm** that the provided WAP matches the one approved by the EPA's TSCA Permit; and **submit** proof of confirmation.	Within 60 days after approval of the TSCA Permit
8	The Permittee shall **provide** Coordination Agreement Letters demonstrating that the latest version of the Contingency Plan has been issued to first responders.	Within 30 days of the effective date of this Permit
9	The Permittee shall **provide** information demonstrating that the Aerosol Can Recycling process used at US Ecology Nevada qualifies for the recycling exemption from being a permitted RCRA HW treatment unit.	Within 180 days of the effective date of this Permit

10	The Permittee shall **discuss with and obtain concurrence from** the Director before submitting any request for a variance from adopted regulations, changes to standards, determinations of equivalent treatment, or any other petitions from the US EPA with potential to affect this RCRA Hazardous Waste Permit.	At least 90 days before submission of any aforementioned request to US EPA
11	*Reserved*	

3. SUMMARY

The Permittee is authorized to store waste in containers subject to the terms and conditions of this Permit, as described in this Section. Containers of hazardous waste are managed in the permitted areas noted in Section 8 (Container Management) of the Part B Permit Application. Containerized wastes, both liquids and solids, are accepted and stored while awaiting treatment, disposal, and/or shipment off-site to other permitted facilities. No treatment of waste in containers is permitted. The storage areas and specific management requirements of each area are specified below, and in the respective sections of the Permit Application.

3.1. CONTAINER STORAGE

The container storage areas are identified in Section 8 (Container Management) of the Part B Permit Application and summarized in Table 3.3, below. The actual locations of these container storage areas can be seen on the map in Figure 8-1 (Container Management Unit Locations) of the Part B Permit Application. The maximum amount and types of waste that may be handled are discussed below, in Permit Condition 3.3.

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

The Permittee must maintain at the Facility the following container-specific documents and information, including all amendments, revisions and modifications to these documents and information. These documents must be maintained until closure is completed for all container storage areas, and certified by a qualified Professional Engineer.

3.2.1. A description of the containment systems showing the following:

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

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

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

of the procedures used to ensure compliance with 40 CFR 264.177 and 264.17.

3.3 PERMITTED AND PROHIBITED WASTE IDENTIFICATION

3.3.1 The Permittee must only accept for container storage those hazardous wastes identified in the Part A Permit Application, and as detailed in Section 8 (Container Management) of the Part B Permit Application. Container storage at the Facility is subject to the terms and limitations of this Permit. TSCA regulated PCB wastes are also subject to the terms of the Permittee's TSCA Approval from US EPA. *[See also NAC 444.843 and 444.9453]*

3.3.2 The Permittee is prohibited from treating waste in containers. Treatment is defined as "…any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume". (Note: Treatment does not include the addition of absorbent for incidental liquid spills.) *[40 CFR 260.10]*

3.3.3 The Permittee may store hazardous waste in the container storage areas, as listed in Table 3.3, below, and in accordance with Section 8 of the Part B Permit Application.

Table 3.3

Container Storage Area	Container Management Unit (CMU) # and Name		Maximum Volume	Maximum Number of Containers
1	CMU 1	PCB /RCRA Processing and DEA Storage Building	59,400 gallons (294 yd^3)	1,080 55-gallon drums
2	CMU 6	Dry Hazardous Waste Storage Area 2 (DHWSA 2)	252,340 gallons (1249 yd^3)	4,588 55-gallon drums
3	CMU 7	Bin Storage Pad (Secondarily Contained)	80,790 gallons (400 yd^3)	1,469 55-gallon drums
4	CMU 16	Container Management and Storage Building (CMS 1)	246,510 gallons (1221 yd^3)	4,482 55-gallon drums
5	CMU 17	Dry Hazardous Waste Storage Area 3 (DHWSA 3)	694,485 gallons (3439 yd^3)	12,627 55-gallon drums
6	CMU 19	Container Management and Storage Building 2 (CMS 2)	203,720 gallons (1009 yd^3)	3,704 55-gallon drums
7	CMU 20	Satellite Laboratory 2	350 gallons (1.7 yd^3)	6 55-gallon drums
8	CMU 21	Dry Hazardous Waste Storage Area 4 (DHWSA 4)	96,800 gallons (480 yd^3)	1,760 55-gallon drums
Total Storage Capacity			**1,634,395 gallons** (8,093.7 yd^3)	**29,716 55-gallon drums**

3.3.4 The Permittee may store hazardous waste for up to one (1) year in Container Storage Areas 1 through 8, as listed in Table 3.3, above. *[40 CFR 268.50(b)]*

3.3.5 Aisle space must be maintained, as noted in Section 8.2.3.2 (Storage and Labeling) of the Part B Permit Application. Rows of containers shall be separated by a minimum aisle space of three (3) feet. Containers larger than or equal to five (5) gallons shall be stacked no more than two (2) high unless shrink-wrapped, banded or otherwise secured on a nestable pallet. Containers less than five (5) gallons shall be stacked no more than three (3) high unless shrink-wrapped, banded or otherwise secured on a nestable pallet. Nested pallets shall be stacked no more than two (2) high. *[40 CFR 264.35]*

3.3.6 The Permittee must perform a Paint Filter Test (EPA method 9095B[i] in SW 846) on hazardous waste to be placed in CMU 6, 17 & 21 (DHWSA 2, 3 & 4). Items which may be excluded from this requirement can be found in a list provided by the Permittee and approved by the NDEP-BSMM.[ii]

3.3.7 The Permittee must not store nor place any hazardous waste (whether accepted from offsite or generated onsite) which contains free liquids, as determined by the Paint Filter Test (EPA method 9095B[i] in SW 846), or containers holding F020, F021, F022, F023, F026 or F027 waste (even if they do not contain free liquids) in an area that does not meet the requirements of 40 CFR 264.175(b).

3.3.8 Any container of liquid hazardous waste must be stored completely within the secondary containment area or within the secondary containment pallet, where permitted. *[40 CFR 264.175(c)]*

3.3.9 The following wastes are prohibited from being stored or managed in CMU 6, 17 & 21 (DHWSA 2, 3 & 4): *[40 CFR 264.175(d)]*

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

3.4 CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. *[40 CFR 264.171]*

3.5 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. The hazardous waste will be stored so that the ability of the container to contain the waste is not impaired, in accordance with Section 8.2.6 (Special Requirements for Incompatible Wastes) of the Part B Permit Application. *[40 CFR 264.172]*

[i] The most up-to-date version of Method 9095 found in EPA publication SW-846.
[ii] See Schedule of Compliance Item 2 in Permit Condition 3.14.

3.6 MANAGEMENT OF CONTAINERS

The Permittee must keep all containers closed during storage or staging, except when it is necessary to visually inspect, add or remove waste; and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. The Permittee must follow the container management practices described in Section 8 (Container Management) of the Part B Permit Application. Containers placed in a Staging Area will only be present during the work shift and not stored overnight. *[40 CFR 264.173]*

3.7 INSPECTION SCHEDULES AND PROCEDURES

The Permittee must inspect all container storage areas in accordance with the Inspection Schedule described in Section 4 (Facility Inspection Plan) of the Part B Permit Application, to detect leaking containers, improperly labeled containers, deterioration of containers and/or the containment system caused by corrosion and other factors. At a minimum, inspections shall be completed at least weekly. *[40 CFR 264.174]*

3.7.1 For containers subject to 40 CFR 264 Subpart CC, the Permittee must comply with the inspection requirements in Permit Condition 9.6.2. *[40 CFR 264.1088]*

3.8 CONTAINMENT SYSTEMS

The Permittee must maintain the secondary containment systems for the Container Storage Areas[iii], as required by 40 CFR 264.175 and as detailed in Section 8.2.4 (Containment) of the Part B Permit Application.

3.9 RECORDKEEPING

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

3.9.2 The Permittee must document compliance with 40 CFR 264.17(a) and (b), 264.176 and 264.177 in the Facility operating record, as required by Permit Condition 2.13. *[40 CFR 264.17(c)]*

3.9.3 For containers subject to 40 CFR 264 Subpart CC, the Permittee must comply with the recordkeeping requirements in Permit Condition 9.7.2. *[40 CFR 264.1089]*

3.10 SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

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

3.10.2 The Permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste as required by 40 CFR 264.17 and 264.176, and follow the procedures specified in

[iii] This applies to the current (CMU 1, CMU 7, CMU 16, CMU 19 and CMU 20) and any future Container Storage Areas which are permitted to store waste containing liquids or waste listed as F020 – F023, F026 or F027 RCRA hazardous waste.

Section 8.2.5 (Special Requirements for Ignitable or Reactive Wastes) of the Part B Permit Application.

3.11 SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

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

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

3.11.3 The Permittee must completely segregate and separate stored containers of incompatible wastes or materials with a berm, fire wall or other acceptable means, and ensure separate secondary containment by following the procedures specified in Section 8.2.6 (Special Requirements for Incompatible Wastes) of the Part B Permit Application. *[40 CFR 264.177(c)]*

3.12 CONTAINER LABELING REQUIREMENTS

3.12.1 The Permittee must label all containers of hazardous waste placed into storage with the date the waste is accepted by the Facility and the Facility tracking label, as described in Section 8.2.3.2 (Storage and Labeling) of the Part B Permit Application.

3.12.1.1 "Acceptance" is defined as the date the shipment arrives at the Facility and the Facility assumes responsibility for the waste. The Permittee shall sign the manifest immediately upon arrival unless a discrepancy is noted, as defined in Permit Condition 2.12.

3.12.2 The Permittee must clearly label all containers of hazardous waste, including Universal Waste (UW), Household Hazardous Waste (HHW), waste received from Very Small Quantity or Conditionally Exempt Generators (VSQG/CESQG) and State Hazardous Waste, with: the words "Hazardous Waste"; the date the waste was placed into storage; the 40 CFR 261 EPA hazardous waste number assigned to the waste; and any State hazardous waste codes for the state in which it was generated. *[40 CFR 262.30-262.32 and NAC 444.8671]*

3.12.3 All labels on containers of waste must be legible and visible for inspection.

3.13 CLOSURE CARE

Upon closure of any of the container storage areas, the Permittee must remove all hazardous waste and hazardous waste residues from the containment system or area, as required by 40 CFR 264.178 and in accordance with the closure procedures in the approved Closure Plan (Sections 8.3 and 15 of the Part B Permit Application). *[40 CFR 264.178]*

3.14 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **submit** to the Division **for review and approval** a modified Section 8.2.5 (Special Requirements for Ignitable or Reactive Wastes) of the Part B Permit Application, to include the standard operating procedures (SOPs) that are followed to demonstrate compliance with 40 CFR 264.17.	Within 90 days of issuance of this Permit
2	The Permittee shall **submit** to the Division **for review and approval** a list of items which will never contain liquids. This shall be provided as an addition to the Part B Permit Application.	Within 30 days of issuance of this Permit
3	*Reserved*	

4. SUMMARY

The Permittee is authorized to store hazardous waste in tanks subject to the terms and conditions of this Permit, as described in this Section. The tank storage portion of the Facility includes four (4) Polychlorinated Biphenyls (PCB's) Storage Tanks, all located adjacent to the east side of CMU 1 (PCB/RCRA Storage Building), three (3) Rinse Water Storage Tanks (90-Day Satellite Accumulation Tanks) located outside of the Main Laboratory and Satellite Laboratories 1 and 2, and two (2) Treatment/Neutralization Storage Tanks located adjacent to Satellite Laboratory 2. No waste with a concentration greater than 500 ppm volatile organic compounds (VOCs) may be stored in tanks at this facility.

*[**NOTE:** Seven (7) Stabilization Tanks (treatment pans), two (2) Treatment/Neutralization Tanks and one (1) Evaporation Tank (truck wash pad), designated as "treatment" tanks, are discussed in Permit Section 5.]*

4.1 TANK STORAGE

The storage tanks are identified in Section 9 (Tank Systems) of the Part B Permit Application and summarized in Table 4.2, below. The locations of these storage tanks can be seen on the map in Figure 9-1(Tank Systems) of the Part B Permit Application. The maximum amount and types of waste that may be handled are discussed below, in Permit Condition 4.2. The four PCB tanks, Tanks T-4 through T-7, are used exclusively for storage of TSCA regulated PCB waste. The rinse water tanks, Tanks T-20, T-21 and T-25, are used for storing rinse water from the respective laboratories. The Treatment/Neutralization Storage Tanks, Tanks T-28 and T-29, will be used for storage of liquid acid wastes before treatment in the Treatment/Neutralization Treatment Tanks, Tanks T-26 and T-27. Each PCB tank has a high-level alarm. Each Rinse Water Storage Tank has a digital liquid level monitor display in the respective laboratory and is within a secondary containment area. Each Treatment/Neutralization Storage Tank has a high-level alarm audible inside Satellite Laboratory 2 and is within a secondary containment area. Details of the PCB Storage Tanks are provided in Section 9.2 and Appendices 9A and 9B of the Part B Permit Application, details of the laboratory rinse water storage tanks are provided in Section 9.7 and Appendices 9A and 9B of the Part B Permit Application, and details of the Treatment/Neutralization Storage Tanks are provided in Section 9.4 and Appendices 9A and 9B of the Part B Permit Application. A drawing of the PCB tank layout can be seen in Appendix 9B of the Part B Permit Application.

4.2 PERMITTED AND PROHIBITED WASTE IDENTIFICATION

4.2.1 The Permittee must only store in Tanks T-4 through T-7 TSCA regulated PCB wastes subject to the terms of the Permittee's TSCA Approval from the US EPA. Since the PCB waste is also a hazardous waste in Nevada, pursuant to NAC 444.843 (and NAC 444.9453), Tanks T-4 through T-7 are also subject to RCRA regulation under 40 CFR Part 261. The Permittee must only store in Tanks T-20, T-21 and T-25, which are 90-Day Satellite Accumulation Tanks, rinse water from the Main and Satellite Laboratories 1 and 2, respectively. The Permittee must only store in Tanks T-28 and T-29 compatible RCRA hazardous wastes, prior to treatment or liquid wastes after treatment.

4.2.2 The Permittee is prohibited from storing in Tanks any hazardous waste not identified in Permit Condition 4.2.1.

4.2.3 The Permittee must store no more than a total volume of 42,615 gallons of hazardous waste in the tanks listed below, as identified in Table 9-1 (Summary of Tank Management Units) of Section 9 (Tank Systems) of the Part B Permit Application, subject to the terms of this Permit, and as follows:

Table 4.2 – Storage Tanks

Tank ID Number	Waste Type	Secondary Containment Required	Permitted Volume [Gallons]
T-4	PCB Liquid	Yes	7,500
T-5	PCB Liquid	Yes	5,000
T-6	PCB Liquid	Yes	5,000
T-7	PCB Liquid	Yes	7,500
T-20[i]	*Main Lab Rinse Water*	Yes	405
T-21[ii]	*Satellite Lab 1 Rinse Water*	Yes	405
T-25 [iii]	*Satellite Lab 2 Rinse Water*	Yes	405
T-28	*TBD*	Yes	8,200
T-29	*TBD*	Yes	8,200
		Total Volume =	**42,615**

4.2.4 The Permittee may store hazardous waste for up to one (1) year in Tanks T-4 through T-7, T-28 and T-29. *[40 CFR 268.50(b)]*

4.2.5 The Permittee may store laboratory rinse water for up to ninety (90) days in Tanks T-20, T-21 and T-25. *[40 CFR 262.17(a)(2)]*

4.3 SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENTS

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

[i] Tank T-20 is a 90-Day Satellite Accumulation Tank located outside of the Main Laboratory.
[ii] Tank T-21 is a 90-Day Satellite Accumulation Tank located outside of Satellite Laboratory 1.
[iii] Tank T-25 is a 90-Day Satellite Accumulation Tank located outside of Satellite Laboratory 2.

4.3.2 The Permittee must design, construct, and operate the secondary containment system(s), in accordance with the detailed design plans and descriptions contained in Section 9 (Tank Systems) of the Part B Permit Application. *[40 CFR 264.193(a)-(f)]*

4.3.3 The Permittee must submit the integrity assessments required under 40 CFR 264.192 to the Director and receive approval prior to operation of any new tank system.

4.4 OPERATING REQUIREMENTS

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

4.4.2 The Permittee must prevent spills and overflows from the tank or containment systems using the methods described in Section 9 (Tank Systems) of the Part B Permit Application, as required by 40 CFR 264.194(b). *[40 CFR 264.194(b)]*

4.4.3 The Permittee must comply with Sections 9.2 (PCB Storage Tanks), 9.4 (Treatment/Neutralization Tanks), 9.7 (Laboratory Rinse Water Tanks), and 9.8 (Subpart AA, BB, and CC Standards) through 9.12 (One Year Storage) of the Part B Permit Application.

4.5 INSPECTION SCHEDULES AND PROCEDURES

4.5.1 The Permittee must inspect the tank systems, as required by 40 CFR 264.195 and in accordance with Sections 4.2.2 (Tank System Inspections) and 9.11 (Inspection of Tanks and Compliance with 40 CFR 264.194 and 264.195) of the Part B Permit Application, must complete the forms in Appendix 4A (Facility Inspections) of the Part B Permit Application, and complete the tasks in Permit Conditions 4.5.2 and 4.5.3 as part of those inspections.

4.5.2 The Permittee must inspect the overfill controls in accordance with the schedule in Table 4-1 (Facility Inspection Schedule) in Section 4 (Facility Inspection Plan) of the Part B Permit Application. *[40 CFR 264.195(a)]*

4.5.3 The Permittee must inspect the following components of the tank system at least once each operating day (at least once every twenty-four (24) hours): *[40 CFR 264.195(b), (c) and (f)]*

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

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

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

4.5.5 The Permittee must inspect all the PCB Tank equipment subject to 40 CFR 264 Subpart BB in accordance with Permit Condition 9.6.1.

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

4.6 RESPONSE TO LEAKS OR SPILLS

4.6.1 In the event of a leak or a spill from the tank system or a secondary containment system, or if any portion of the system becomes unfit for continued use, the Permittee must comply with Section 9.10 (Response to Leaks or Spills and Disposition of Unfit Tanks) of the Part B Permit Application, remove the system from service immediately, and complete the following actions:
[40 CFR 264.196]

1. Immediately stop the flow of hazardous waste into the tank or secondary containment system and inspect the system to determine the cause of the release. *[40 CFR 264.196(a)]*
2. If the release is from the tank system, the Permittee must, within 24 hours after detection of the leak, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed. If the Permittee finds that it is not possible to meet this time period, then, within 24 hours, the Permittee shall notify the Director and demonstrate that a longer period is required. *[40 CFR 264.196(b)]*

   If the release is to a secondary containment system, all released materials must be removed within twenty-four (24) hours or in as timely a manner as is possible to prevent harm to human health and the environment.
3. Immediately contain visible releases to the environment, conduct a visual inspection of the release, and, based on that inspection, the Permittee shall: *[40 CFR 264.196(c)]*
   (a) Prevent further migration of the leak or spill to soils or surface water; and
   (b) Remove and properly dispose of any visible contamination of the soil or surface water.
4. If the collected material is a RCRA hazardous waste, the waste shall be managed in accordance with all applicable requirements of 40 CFR Parts 262-264. The Permittee shall determine if the waste is subject to the reporting under 40 CFR 302.
5. Unless the Permittee satisfies the requirements of Permit Condition 4.6.1 Items 5(a) and 5(b), below, the tank system must be closed in accordance with Permit Condition 4.10. *[40 CFR 264.196(e)(1)]*

   (a) For a release caused by a spill that has not damaged the integrity of the system, the Permittee may return the system to service as soon as the released waste is removed and repairs, if necessary, are made. *[40 CFR 264.196(e)(2)]*

(b) For a release caused by a leak from the primary tank system into the secondary containment system, the Permittee shall repair the system prior to returning the tank system to service. *[40 CFR 264.196(e)(3)]*

(1) If a component of the tank system is replaced to eliminate the leak, the new component must satisfy the requirements for new tank systems or components in 40 CFR 264.192 and 264.193.

4.6.2 For all major repairs of a tank system, the Permittee must obtain a certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This must be obtained before the system is returned to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment system. This certification must be placed in the Facility's operating record, maintained until closure of the Facility, and a copy submitted to the Director. *[40 CFR 264.196(f)]*

4.7 RECORDKEEPING AND REPORTING

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

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

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

4.7.3 The Permittee must submit to the Director all certifications of major repairs to correct leaks within seven (7) days from returning the tank system to use. *[40 CFR 264.196(f)]*

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

4.7.5 The Permittee must obtain and keep on file at the Facility the written statements by those persons (e.g. qualified Professional Engineer) required to certify the design and installation of the tank system. *[40 CFR 264.192(g)]*

4.7.6 For PCB Tank equipment subject to 40 CFR 264 Subpart BB, the Permittee must comply with the recordkeeping requirements in Permit Section 9 (Organic Air Emission Conditions).

4.8 SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

4.8.1 The Permittee must not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Section 9.9.2 (Precautions for Management of Ignitable or Reactive Wastes) of the Part B Permit Application are followed and 40 CFR 264.17(b) is complied with. *[40 CFR 264.198(a)]*

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

4.9 SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

4.9.1 The Permittee must not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in Section 9.9.1 (Precautions for the Management of Incompatible Materials) of the Part B Permit Application are followed and 40 CFR 264.17(b) is complied with. *[40 CFR 264.199(a)]*

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

4.10 CLOSURE AND POST-CLOSURE CARE

4.10.1 At closure of the tank system(s), the Permittee must follow the procedures in Sections 15 (Scheduled Closure Plan) and 9.13 (Closure of Tanks) of the Part B Permit Application for the tanks identified in Table 4.2, above, as required by 40 CFR 264.197. *[40 CFR 264.197(a)]*

4.10.2 If the Permittee demonstrates that not all contaminated portions of the tank system, residuals, soil and/or groundwater can be practicably removed or decontaminated in accordance with the Scheduled Closure Plan, then the Permittee must close the tank system(s) and perform post-closure care in accordance with 40 CFR 264.197(b).

4.11 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **submit** to the Division drawings showing the location of Tank T-25.	Prior to placing laboratory rinsewater in Tank T-25

	Task	Date Due
2	The Permittee shall **obtain** a Construction Certification for Tank T-25 by a Nevada registered Professional Engineer and **submit** to the Division the Certification and **obtain approval** from the Division.	Thirty (30) days prior to placing laboratory rinsewater in Tank T-25
3	The Permittee shall **submit** to the Division drawings showing the layout of Tanks T-28 and T-29, including a location drawing and Piping & Instrument Diagram.	Prior to Task #4.
4	The Permittee shall **conduct** Tank Integrity Assessments on Tanks T-28 and T-29, as described in Section 9.4.2 of the Part B Permit Application and required by 40 CFR 264.192, by a Nevada registered Professional Engineer, **submit** to the Division the Certifications and **obtain approval** from the Division.	Prior to , or with, Task #5
5	The Permittee shall **submit** to the Division a Construction Certification Report for Tanks T-28 and T-29 and **obtain approval** from the Division.	Prior to placing waste in each tank
6	The Permittee shall **conduct** integrity assessments on Tanks T-28 and T-29, as described in the *Neutralization Tank Farm – Complete Integrity Assessment [June 11, 2025]* by a Nevada registered Professional Engineer, **submit** to the Division the Certifications and **obtain approval** from the Division.	Every 2 years, after Tanks T-28 and T-29 are placed in service.
7	The Permittee shall **submit** to the Division a modified Section 9.4 of the Part B Permit Application to include the type(s) of waste to be stored in Tanks T-28 and T-29.	Within 90 days of issuance of this Permit.
8	*Reserved*	

5. SUMMARY

The Permittee is authorized to treat hazardous waste in tanks subject to the terms and conditions of this Permit, as described in this Section. The treatment consists of stabilization, evaporation and neutralization. There are seven (7) stabilization tanks (treatment pans) for the treatment of liquid and metal bearing wastes (see Table 5.1). There are two (2) reactor tanks for the neutralization of acidic and/or basic liquid waste and stabilization of heavy metal bearing liquid waste (see Table 5.1). A tenth tank (T-11) is used for decontaminating equipment (trucks, etc.) and allowing the wash-water to evaporate. No waste with a concentration greater than 500 ppm volatile organic compounds (VOCs) may be treated in tanks at this Facility; thus, the treatment tanks are not subject to 40 CFR 264 Subpart CC regulations. Tank T-11 is assumed to contain less than 500 parts per million (ppm) of VOCs; however, the Permittee is required to test the solid and liquid phases in Tank T-11 for VOCs, as specified in this permit section.

5.1 TANK TREATMENT

The treatment tanks are identified in Section 9 (Tank Systems) of the Part B Permit Application and summarized in Table 5.1, below. The locations of these treatment tanks can be seen on the map in Figure 9-1 (Tank Systems) of the Part B Permit Application. The maximum amount and types of waste that may be treated in the tanks are discussed below, in Permit Condition 5.2. Two of the stabilization tanks, Tanks T-2 and T-3, are outdoor units and the other five stabilization tanks, Tanks T-18, T-19, T-22, T-23 and T-24, are indoor units. The two reactor tanks, Tanks T-26 and T-27, are indoor units. The evaporation tank, Tank T-11, is an outdoor unit. The containment systems employed for the treatment tanks are discussed in detail in Section 9 (Tank Systems) of the Part B Permit Application.

5.2 PERMITTED AND PROHIBITED WASTE IDENTIFICATION

5.2.1 The Permittee must only treat the hazardous waste identified in the Part A Permit Application in the stabilization tanks listed in Table 5.1, within the parameters outlined in Section 10 (Tank Systems Report) of the Part B Permit Application. *[See also NAC 444.843 and 444.9453]*

5.2.2 The Permittee is prohibited from treating in tanks any hazardous waste not identified in Permit Condition 5.2.1 and the following:

1. Any hazardous waste with codes not listed in the Part A Permit Application.
2. Hazardous waste containing 500 ppmw or more of VOCs at the point of waste origination.

[Section 3.5.6.2 of the Part B Permit Application, 40 CFR 264.1082(c)(1)]

5.2.3 The Permittee is prohibited from treating waste in Tank T-11 that has a PCB concentration of 50 mg/L or more.

5.2.4 The Permittee must treat no more than a total volume of 3,340,480 gallons of hazardous waste per day in the tanks listed below, as identified in Table 9-1 (Summary of Tank Management Units) of

Section 9 (Tank Systems) of the Part B Permit Application, subject to the terms of this Permit, and as follows:

Table 5.1 – Treatment Tanks

Tank ID Number	Description	Secondary Containment Required	Capacity [Gallons]	Permitted Throughput [Gallons/Day]
T-2	Stabilization Tank (Pan 2)	Yes	35,500	426,000
T-3	Stabilization Tank (Pan 3)	Yes	35,500	426,000
T-18	Stabilization Tank (Pan 4)	Yes	17,250	207,000
T-19	Stabilization Tank (Pan 5)	Yes	17,250	207,000
T-22	Stabilization Tank (Pan 6)	Yes	40,200	482,400
T-23	Stabilization Tank (Pan 7)	Yes	40,200	482,400
T-24	Stabilization Tank (Pan 8)	Yes	23,200	278,400
T-26	Reactor Tank 1	Yes	17,110	410,640
T-27	Reactor Tank 2	Yes	17,110	410,640
T-11	Evaporation Tank (Truck Wash Pad)	Yes	10,000	10,000
		Total =	**253,320**	**3,340,480**

5.3 SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENTS

5.3.1 The Permittee must continue to ensure that the batch stabilization tanks (T-2 and T-3) are provided with a backfill material that is non-corrosive, porous, and homogeneous (e.g. sand), and that the backfill is completely around the tank and compacted to ensure that the tank and piping, if any, are fully and uniformly supported. *[40 CFR 264.192(c)]*

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

5.3.3 The Permittee must operate the secondary containment system(s), in accordance with the detailed descriptions contained in Section 9 (Tank Systems) of the Part B Permit Application. *[40 CFR 264.193(a)-(f)]*

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

5.4 OPERATING REQUIREMENTS

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

5.4.2 The Permittee must prevent spills and overflows from the tank or containment systems using the methods described in Section 9 (Tank Systems) of the Part B Permit Application, as required by 40 CFR 264.194(b). *[40 CFR 264.194(b)]*

5.4.3 The Permittee must comply with Sections 9.1 (Stabilization Units and Tanks), 9.3 (Decontamination Pad and Evaporation Tank) and 9.8 (Subpart AA, BB and CC Standards) through 9.13 (Closure of Tanks) of the Part B Permit Application.

5.4.4 The Permittee must manage any waste coming out of Tank T-11 (Evaporation Tank) as a listed RCRA hazardous waste until analysis indicates otherwise.

5.5 INSPECTION SCHEDULES AND PROCEDURES

5.5.1 The Permittee must inspect the tank systems, as required by 40 CFR 264.195 and in accordance with Sections 4.2.2 (Tank System Inspections) and 9.11 (Inspection of Tanks and Compliance with 40 CFR 264.194 and 264.195) of the Part B Permit Application, must complete the forms in Appendix 4A (Facility Inspections) of the Part B Permit Application, and complete the tasks in Permit Conditions 5.5.2 and 5.5.3 as part of those inspections.

5.5.2 The Permittee must inspect the overfill controls, in accordance with the schedule in Table 4-1 (Facility Inspection Schedule) of Section 4 (Facility Inspection Plan) of the Part B Permit Application. *[40 CFR 264.195(a)]*

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

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

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

1. The proper operation of the cathodic protection system must be confirmed within six (6) months from initial installation and annually thereafter; and
2. All sources of impressed current must be inspected and tested every other month.

5.5.5 The Permittee must document compliance with Permit Conditions 5.5.1 through 5.5.4 and place this documentation in the operating record for the Facility. *[40 CFR 264.195(h)]*

5.6 RESPONSE TO LEAKS OR SPILLS

5.6.1 In the event of a leak or a spill from the tank system, from a secondary containment system, or if any portion of the system becomes unfit for continued use, the Permittee must comply with Section 9.10 (Response to Leaks or Spills and Disposition of Unfit Tanks) of the Part B Permit Application, remove the system from service immediately, and complete the following actions:

[40 CFR 264.196]

1. Immediately stop the flow of hazardous waste into the tank or secondary containment system and inspect the system to determine the cause of the release. *[40 CFR 264.196(a)]*
2. If the release is from the tank system, the Permittee must, within twenty-four (24) hours after detection of the leak, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed. If the Permittee finds that it will not be possible to meet this time period, the Permittee shall notify the Director and demonstrate that a longer period is required. *[40 CFR 264.196(b)]*

   If the release is to a secondary containment system, all released materials must be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.
3. Immediately conduct a visual inspection of the release and, based on that inspection, the Permittee shall:
   (a) Prevent further migration of the leak or spill to soils or surface water; and
   (b) Remove and properly dispose of any visible contamination of the soil or surface water.
4. As the collected material is a RCRA hazardous waste, the waste shall be managed in accordance with all applicable requirements of 40 CFR Parts 262-264. The Permittee shall determine if the waste is subject to the reporting under 40 CFR 302.
5. Unless the Permittee satisfies the requirements of Permit Condition 5.6.1 Items 5(a) and 5(b), below, the tank system must be closed in accordance with Permit Condition 5.10.

   [40 CFR 264.196(e)(1)]

   (a) For a release caused by a spill that has not damaged the integrity of the system, the Permittee may return the system to service as soon as the released waste is removed and repairs, if necessary, are made. *[40 CFR 264.196(e)(2)]*
   (b) For a release caused by a leak from the primary tank system into the secondary containment system, the Permittee shall repair the system prior to returning the tank system to service. *[40 CFR 264.196(e)(3)]*
      (1) If a component of the tank system is replaced to eliminate the leak, the new component must satisfy the requirements for new tank systems or components in 40 CFR 264.192 and 264.193.

5.6.2 For all major repairs of a tank system, the Permittee must obtain a certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This must be obtained before the system is returned to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank,

or repair or replacement of a secondary containment system. The certification must be placed in the Facility's operating record, maintained until closure of the Facility; and a copy submitted to the Director. *[40 CFR 264.196(f)]*

5.7 RECORDKEEPING AND REPORTING

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

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

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

5.7.3 The Permittee must submit to the Director all certifications of major repairs to correct leaks within seven (7) days from returning the tank system to use. *[40 CFR 264.196(f)]*

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

5.7.5 The Permittee must obtain and keep on file at the Facility the written statements by those persons (e.g. qualified Professional Engineer) required to certify the design and installation of the tank system. *[40 CFR 264.192(g)]*

5.7.6 The Permittee must, on an annual basis, sample the Evaporation Pad liquid and solid phases in the tank and test for Volatile Organic Compounds (VOCs), RCRA Toxicity metals, total cyanide, and conductivity. The test results shall be submitted to the Director with the annual facility report due March 1 (see Permit Condition 2.13.4).

5.8 SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

5.8.1 The Permittee must not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Section 9.9.2 (Precautions for Management

of Ignitable or Reactive Wastes) of the Part B Permit Application are followed. *[40 CFR 264.198(a)]*

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

5.9 SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

5.9.1 The Permittee must not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in Section 9.9.1 (Precautions for the Management of Incompatible Materials) of the Part B Permit Application are followed and 40 CFR 264.17(b) is complied with. *[40 CFR 264.199(a)]*

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

5.10 CLOSURE CARE

5.10.1 At closure of the tank system(s), the Permittee must follow the procedures in Sections 15 (Scheduled Closure Plan) and 9.13 (Closure of Tanks) of the Part B Permit Application, for the tanks identified in Table 5.1, above, as required by 40 CFR 264.197. *[40 CFR 264.197(a)]*

5.10.2 If the Permittee demonstrates that not all contaminated portions of the tank system(s), residuals, soil and/or groundwater can be practicably removed or decontaminated in accordance with the Closure Plan, then the Permittee must close the tank system(s) and perform post-closure care in accordance with 40 CFR 264.197(b).

5.11 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **submit** to the Division drawings showing the layout of Tanks T-26 and T-27, including a location drawing and Piping and Instrumentation Diagram.	Prior to Task #2.
2	The Permittee shall **conduct** Tank Integrity Assessments on Tanks T-26 and T-27, as described in Section 9.4.2 of the Part B Permit Application and required by 40 CFR 264.192, by a Nevada registered Professional Engineer, **submit** to the Division the Certifications and **obtain approval** from the Division.	Thirty (30) days prior to usage of each tank.

3	The Permittee shall **conduct** integrity assessments on Tanks T-26 and T-27, as described in the *Neutralization Tank Farm – Complete Integrity Assessment [June 11, 2025]* by a Nevada registered Professional Engineer, **submit** to the Division the Certifications and **obtain approval** from the Division.	Every 2 years, after Tanks T-26 and T-27 are placed in service.
4	*Reserved*	

6. SUMMARY

The Permittee is authorized to operate one (1) Subpart X (i.e. Miscellaneous) Unit. The Subpart X Unit is a portable Waste Grinder unit (WG-1). This unit is portable and will be operated only within permitted Container Management Units (CMUs) the secondary containment areas of Stabilization Tanks and the Waste Staging Pad at the Facility. The WG-1 is used to reduce 'hockey puck' (~3 inch diameter, 1 inch thick) sized pool cleaning wastes to a smaller size for further treatment before disposal.

This RCRA Miscellaneous Unit is permitted under the Subpart X requirements of 40 CFR 264 (40 CFR 264.600 – 264.603) and may include additional requirements pursuant to 40 CFR 270.32(b)(2), as described by the Division, for further protective measures for both human health and the environment.

6.1 MISCELLANEOUS UNIT DESCRIPTION

The Miscellaneous Unit is not permitted for the storage of hazardous waste. Hazardous waste must not be stored within three (3) feet of the area surrounding the Miscellaneous Unit.

6.1.1 Waste Grinder (WG-1)

The Waste Grinder (WG-1) is described in Section 12 (Miscellaneous (Subpart X) Units) of the Part B Permit Application and summarized in Table 6.2, below. WG-1 is a portable unit and includes a single drum rotor grinder equipped with an infeed hopper, support stand, and discharge hopper. The WG-1 is used for reducing the size of pool cleaning waste from 'hockey puck' size to a milled smaller size which ensures complete deactivation prior to disposal.

6.2 PERMITTED AND PROHIBITED WASTE IDENTIFICATION AND PERMITTED CAPACITY – TREATMENT

6.2.1 The Permittee must only treat at the WG-1, the hazardous waste identified in Table 6.2 within the parameters outlined in Section 12 (Miscellaneous (Subpart X) Units) of the Part B Permit Application.

Table 6.2 – Subpart X Units

Description	Miscellaneous Code & Process	Permitted Throughput	Permitted EPA Waste Codes
Waste Grinder (WG-1)	X02	*To be Determined*	D001, D002

6.2.2 The Permittee is prohibited from treating in the WG-1 any hazardous waste not identified in Table 6.2, above. Specifically, WG-1 is only permitted to treat solid pool chemical pucks which most commonly contain calcium hypochlorite, sodium hypochlorite, and chlorinated isocyanurates (Tri-Chlor and Di-Chlor).

6.2.3 The Permittee may grind up to [daily quantity and unit limits] of the hazardous waste per day in the WG-1, subject to the terms of this Permit.

6.3 SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENTS

6.3.1 The Permittee must ensure that all ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction.

[40 CFR 264.192(e)]

6.3.2 The Permittee must maintain and operate the secondary containment system(s) for the permitted CMUs, Stabilization Tanks and the Waste Staging Pile in which the WG-1 will be operating in accordance with the detailed descriptions in Sections 8 (Container Management), 9.1 (Stabilization Units and Tanks) and 11 (Waste Staging Pile) of the Part B Permit Application.

[40 CFR 264.193(a)-(f)]

6.3.3 The Permittee must maintain and operate the containment as follows:

1. Keep it free of cracks or gaps and impervious to contain leaks and spills until the collected material is detected and removed;
2. Prevent stormwater run-on into the containment system; and
3. Remove spilled waste within twenty-four (24) hours or in as timely a manner as is possible to prevent overflow of the containment.

6.3.4 The Permittee must submit the integrity assessments required under 40 CFR 264.192 to the Director prior to operation of any new Miscellaneous Unit and whenever the system(s) are re-evaluated.

6.4 OPERATING REQUIREMENTS

The WP-1 must be operated in accordance with the requirements of this Permit Section and Section 12 (Miscellaneous (Subpart X) Units) of the Part B Permit Application.

6.4.1 The Permittee must comply with the Environmental Performance Standard provisions of 40 CFR 264.601 by following the operating procedures and controls described in Section 12.2 (Performance Standards) of the Part B Permit Application.

6.4.2 The Permittee must operate the Miscellaneous Unit in accordance with the procedures provided in Section 12 (Miscellaneous (Subpart X) Units) of the Part B Permit Application.

6.4.3 The Permittee must not place hazardous waste or treatment reagents in a Miscellaneous Unit that could cause the unit, its ancillary equipment, or its secondary containment to rupture, leak, corrode or otherwise fail. *[40 CFR 264.194(a)]*

6.4.4 The Permittee must prevent spills and overflows from a Miscellaneous Unit, its ancillary equipment, or its containment using the methods described in Section 12 (Miscellaneous (Subpart X) Units) of the Part B Permit Application, as required by 40 CFR 264.194(b).

[40 CFR 264.194(b)]

6.4.5 The Permittee must transfer waste between tanks, containers, or Miscellaneous Units in accord with Sections 7.8 (Process Operations), 8.2.3 (Container Management Practices), 9 (Tank Systems) and 12 (Miscellaneous (Subpart X) Units) of the Part B Permit Application.

6.5 INSPECTION SCHEDULES AND PROCEDURES

6.5.1 The Permittee must inspect the Subpart X Units, their ancillary equipment, and their secondary containment in accordance with the Inspection Schedule and Checklist described in Section [section # ([title of section]) in permit application] and Appendix [appendix # in permit application] ([title of appendix]) of the Part B Permit Application.

6.5.2 The Permittee must inspect the Subpart X Unit(s), their ancillary equipment, and their secondary containment daily for condition, proper equipment operation, and housekeeping.

6.5.3 The Permittee must perform maintenance and testing on the Subpart X Unit(s) in accordance with Section [section # in permit application (title of section)] of the Part B Permit Application.

6.5.4 The Permittee must document compliance with Permit Conditions 6.5.1 through 6.5.3 and place this documentation in the operating record for the Facility. *[40 CFR 264.195(h)]*

6.6 RESPONSE TO LEAKS OR SPILLS

6.6.1 In the event of a leak or a spill from a Miscellaneous Unit, its secondary containment system, its ancillary equipment, or if any portion of the system becomes unfit for continued use, the Permittee must comply with Section [section # in permit application (title of section)] of the Part B Permit Application, remove the system from service immediately, and complete the following actions: *[40 CFR 264.196]*

1. Immediately stop the flow of hazardous waste into and out of the Miscellaneous Unit, its secondary containment system, or its ancillary equipment and inspect the system to determine the cause of the release. *[40 CFR 264.196(a)]*
2. If the release is from the Miscellaneous Unit or its ancillary equipment, the Permittee must, within twenty-four (24) hours after detection of the leak, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the Miscellaneous Unit or its ancillary equipment to be performed. If the Permittee finds that it will not be possible to meet this time period, the Permittee shall notify the Director and demonstrate that a longer period is required. *[40 CFR 264.196(b)]*

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

3. Immediately contain releases to the environment, conduct a visual inspection of the release and, based on that inspection, the Permittee shall:
   (a) Prevent further migration of the leak or spill to soils or surface water; and
   (b) Remove and properly dispose of any visible contamination of the soil or surface water.
4. As the collected material is a RCRA hazardous waste, the waste shall be managed in accordance with all applicable requirements of 40 CFR Parts 262-264. The Permittee shall determine if the waste is subject to the reporting under 40 CFR Part 302.
5. Unless the Permittee satisfies the requirements of Permit Condition 6.6.1 Items 5(a) and 5(b), below, the Miscellaneous Unit must be closed in accordance with Permit Condition 6.8. *[40 CFR 264.196(e)(1)]*
   (a) For a release caused by a spill that has not damaged the integrity of the system, the Permittee may return the system to service as soon as the released waste is removed and repairs, if necessary, are made. *[40 CFR 264.196(e)(2)]*
   (b) For a release caused by a leak from the Miscellaneous Unit into the secondary containment system, the Permittee shall repair the system prior to returning the Miscellaneous Unit to service. *[40 CFR 264.196(e)(3)]*
      (1) If a component of the Miscellaneous Unit is replaced to eliminate the leak, the new component must satisfy the requirements for new Miscellaneous Units or components in 40 CFR 264.601 and 264.602.

6.6.2 For all major repairs of a Miscellaneous Unit, its ancillary equipment or secondary containment system, the Permittee must obtain a certification by a qualified Professional Engineer that the repaired unit, ancillary equipment or secondary containment system is capable of handling the hazardous wastes without release for the intended life of the system. This must be obtained before the system is returned to service. Examples of major repairs are: installation of an internal liner, repair of a vessel, or repair or replacement of a secondary containment system. The certification must be placed in the Facility's operating record, maintained until closure of the Facility; and a copy submitted to the Director. *[40 CFR 264.196(f)]*

6.7 RECORDKEEPING AND REPORTING

6.7.1 The Permittee must report to the Director, within twenty-four (24) hours of detection, when a leak or spill occurs, including any fire, from a Miscellaneous Unit, its secondary containment or its ancillary equipment to the environment (surrounding ground surface and air). (A leak or spill of one pound or less of hazardous waste that is immediately contained and cleaned up, need not be reported.) If the Permittee has reported the release pursuant to 40 CFR Part 302, that report satisfies the requirements of this Permit Condition. *[40 CFR 264.196(d)(1) and (2)]*

6.7.2 Within thirty (30) days of detecting a release to the environment from a Miscellaneous Unit, its secondary containment or its ancillary equipment, the Permittee must report the following information to the Director: *[40 CFR 264.196(d)(3)]*

1. Likely route of migration of the release;
2. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

3. Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee shall provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
4. Proximity of downgradient drinking water, surface water, and populated areas; and
5. Description of response actions taken or planned.

6.7.3 The Permittee must submit to the Director all certifications of major repairs to correct leaks within seven (7) days from returning the Miscellaneous Unit to use. *[40 CFR 264.196(f)]*

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

6.7.5 The Permittee must obtain and keep on file at the Facility the written statements by those persons (e.g. qualified Professional Engineer) required to certify the design and installation of the Miscellaneous Unit. *[40 CFR 264.192(g)]*

6.7.6 The Permittee must maintain at the Facility, until closure is complete for the Miscellaneous Units, and certified by a qualified Professional Engineer, the following Subpart X specific documents and information, including all amendments, revisions and modifications to these documents and information:

1. Where incompatible wastes are stored or otherwise managed in this subpart, a description of the procedures used to ensure compliance with 40 CFR 264.175(a) and (b), and 40 CFR 264.17(b) and (c).

6.8 CLOSURE AND POST-CLOSURE CARE

6.8.1 At closure of the Miscellaneous Units, the Permittee must follow the procedures in Section 15 (Scheduled Closure Plan) and Section 12.6 (Closure and Post-Closure Care) of the Part B Permit Application, for the Miscellaneous Units identified in Table 6.2, above. *[40 CFR 264.197(a)]*

6.8.2 If the Permittee cannot remove or decontaminate the Miscellaneous Unit, appurtenances, soil and/or groundwater in accordance with the Closure Plan, then the Permittee must close the Miscellaneous Unit and perform post-closure care in accordance with 40 CFR 264.603.

6.9 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

Task		Date Due
1	The Permittee shall **submit** to the Division **for review and approval** the Standard Operating Procedure for WG-1, to be placed in Appendix 12B of the RCRA Part B Permit Application.	Prior to Task #2
2	The Permittee shall **conduct** an Integrity Assessment on WG-1 unit with a daily throughput [cubic yards/day] and	Prior to Task #3

	submit to the Division **for review and approval** the Certification by a Nevada registered Professional Engineer.	
3	The Permittee shall **submit** to the Division **for review and approval** an updated Part A Application with the throughput for WG-1 added.	Prior to Tasks #4 and 5
4	The Permittee shall **submit** to the Division **for review and approval** an Inspection Schedule and Checklist describing how often WG-1 will be inspected and what is checked during each inspection.	Thirty (30) days prior to usage of WG-1
5	The Permittee shall **submit** to the Division **for review and approval** a description of the maintenance and testing that will be performed on WG-1, including frequency, to ensure that the unit is operating properly.	Thirty (30) days prior to usage of WG-1
6	*Reserved*	

7. SUMMARY

The Permittee is authorized to conduct landfill operations in Phase C of Trench 13. Trench 11 and Trench 12 have been closed and are in post-closure care. The addition of Trench 13 was approved in 2016 and began waste disposal operations in 2017. This Permit Section and all Permit Conditions and sections of the Part B Permit Application containing information related to the permitted landfills shall be reviewed and, if necessary, modified five (5) years after the issuance of this Permit, as described in Permit Condition 1.2.4.

7.1 LANDFILL DISPOSAL

The landfills are identified in Section 10 (Landfill Report) of the Part B Permit Application and the currently operating landfills are summarized in Table 7.2, below. The locations of the landfills can be seen on the map in Figure 1-3 (Facility Access and Layout) of the Part B Permit Application. The types of waste that may be disposed of in the landfills are discussed below, in Permit Condition 7.2.

The RCRA permitted trenches at the Facility are:

Trench 11 was constructed with a double composite liner consisting of a primary 100-mil HDPE liner and a secondary 40-mil HDPE liner and a 6" compacted clay liner amended with bentonite. The design was approved as meeting the Minimum Technology Requirements (MTR) in the June 6, 1988 permit. The below grade capacity of Trench 11 was 847 acre-feet (1.36 million cubic yards) and the area of the footprint is 12.3 acres. The above-grade capacity of Trench 11 was 1,000,000 cubic yards. Trench 11 was closed and the alternative final cover placed in July 2013.

Trench 12 is comprised of three phases. Phase 1 was constructed in 2008, Phase 2 was constructed in 2011, and Phase 3 was constructed in 2013. Trench 12 is constructed with a double composite liner consisting of a primary 80-mil HDPE liner and a secondary 60-mil HDPE liner and a geosynthetic clay liner (GCL), exceeding the MTR. The base footprint of Trench 12 is 11 acres and the total landfill capacity was 1,029 acre-feet (1.66 million cubic yards) of waste and final cover material. Trench 12 was closed and the alternative final cover placed in January 2021.

Trench 13 will be constructed in five phases, with a base total footprint of 47.3 acres and a waste capacity of approximately 5,331 acre-feet (8.6 million cubic yards). Phase A was constructed and began accepting waste in 2017, reached below-grade capacity in 2021 and is currently accepting waste above-grade. Phase B was constructed in 2021, is expected to reach below-grade capacity in 2025 and is currently accepting waste. Phase C began construction in April 2025 and will begin accepting, after installation of the Operations Layer, TSCA regulated PCB wastes, RCRA and state-designated hazardous wastes, as well as certain non-hazardous wastes.

7.2 PERMITTED AND PROHIBITED WASTE IDENTIFICATION

7.2.1 The Permittee must only dispose of the hazardous wastes identified in the Part A Permit Application, and other hazardous wastes as identified in NAC 444.843, including wastes containing polychlorinated biphenyls (PCBs), subject to the terms and limitations of this Permit.

7.2.2 The Permittee is prohibited from disposing of any hazardous waste not included in Permit Condition 7.2.1 or not meeting the treatment standards of 40 CFR 268.

7.2.3 The Permittee may dispose of hazardous waste in the landfills, as listed in Table 7.2, below, and in accordance with Section 10 (Landfill Report) of the Part B Permit Application.

Table 7.2

Landfill (# of Phases)		Total Landfill Capacity	Base Footprint	Waste Description
1	Trench 13 (5 phases)	5,331 acre feet (8.6 million yards^3)	47.3 acres	RCRA, TSCA and state-designated hazardous wastes and certain non-hazardous wastes
2	*Reserved*			

7.3 DESIGN AND OPERATING REQUIREMENTS

7.3.1 The Permittee must design, maintain and operate landfill Trench 13 pursuant to Volumes 1 and 2, Landfill Engineering Report Trench 13, AquAeTer, March 2016, which is referenced in Attachment 2 to this Permit.

7.3.2 The Permittee must install and maintain a bottom composite liner system with at least two liners, a leachate collection and removal system and a leak detection system (one above and one between the liners) in accordance with the design plans and reports in Section 10 of the Part B Permit Application (Trench 11 already constructed and closed, Trench 12 already constructed and closed, and Trench 13 under construction and active), the Supplement-Landfill Report for Trench 12, October 2007 (standalone document referenced in Attachment 2 to this Permit) and Landfill Engineering Report–Trench 13, AquAeTer, March 2016 (standalone document referenced in Attachment 2 to this Permit). *[40 CFR 264.301(c)]*

7.3.3 The Permittee submitted a final cap design (approved by the Director by Revision 3 to Permit NEVHW0019) for Trenches 11 and 12, as described in the "Design Basis and Construction Specifications for Trenches 11 and 12 Final Covers – Supplement to Trench 12 Construction Quality Assurance Plan, April 2008" (standalone document); and supplemented for Trench 13, as described in the "Landfill Engineering Report – Trench 13, AquAeTer, March 2016" (standalone document referenced in Attachment 2 to this Permit). The alternative cover design (aka evapotranspiration or ET cover) has been designed to resist the maximum horizontal acceleration in lithified earth material for the site. Maximum horizontal acceleration is defined as the maximum expected horizontal acceleration depicted on a seismic hazard map with a 90 percent or greater

probability that the acceleration will not be exceeded in 250 years. The Permittee must close Trench 13 in conformance with the above referenced plan and evaluate the performance of the cover with the installation and monitoring of a drainage lysimeter at an appropriate location on the final cover of Trench 13.

7.3.4 Collected leachate must be managed in accordance with the procedures for all other waste streams, as outlined in the Waste Analysis Plan (Section 7 of the Part B Permit Application). Leachate collected at Trench 13 may be used for dust suppression within the same cell from which it was generated, provided the collected leachate never leaves the landfill (see EPA memo dated May 23, 1996 referenced in Section 10.8.10 of the Part B Permit Application) and analysis shows PCB concentrations <0.5 micro-g/L and VOC concentrations <500 ppm. Leachate collected at Trench 11 and Trench 12 is F039 hazardous waste and must be managed as hazardous waste.

7.3.5 The Permittee must locate, construct, operate, and maintain landfills Trench 11, Trench 12 and Trench 13 as specified in Section 10 of the Part B Permit Application, so as to prevent the migration of any hazardous constituents into the groundwater or surface water, at least as effectively as the liners and leachate collection and removal systems outlined in 40 CFR 264.301(c). *[40 CFR 264.301(d)]*

7.3.6 The Permittee must design, construct, operate, and maintain a run-on and run-off control system in accordance with the design plans, specifications, and operating practices contained in Section 10 of the Part B Permit Application, as required by 40 CFR 264.301(g) and (h).
[40 CFR 264.301(g) and (h)]

7.3.7 The Permittee must empty or otherwise manage run-on and run-off collection and holding facilities to maintain the design capacity of the system(s) within 48 hours of a 25-year 24-hour storm event or larger and in accordance with any other required permits (i.e. NPDES). *[40 CFR 264.301(i)]*

7.3.8 The Permittee must cover or otherwise manage the landfill(s) to control wind dispersal of particulate matter, in accordance with the methods specified in Section 10.8.10 (Wind Dispersal Control) of the Part B Permit Application, as required by 40 CFR 264.301(j).
[40 CFR 264.301(j)]

7.3.9 The Permittee must sample and analyze each quarter, leachate from each Leachate Collection and Removal System (LCRS) and the Leak Detection System (LDS) for the parameters found in Table 10.4D in Permit Section 10 (Groundwater Detection Monitoring). The results of these analyses must be submitted with the semiannual report required under Permit Condition 10.9.2.

7.3.10 Gravel to be used in the leachate sumps for landfill Trench 13 must meet the requirements of 40 CFR 264.301(c)(3)(ii).

7.3.11 Prior to accepting waste in each newly constructed cell of landfill Trench 13, the Permittee must receive approval from the Director.

7.4 ACTION LEAKAGE RATE / RESPONSE ACTION PLAN (RAP)

The Permittee must operate landfills Trench 11, Trench 12 and Trench 13 in accordance with the respective Response Action Plans (RAP) in Section 10 of the Part B Permit Application: Appendix 10A for Trench 11, Appendix 10B for Trench 12 and Appendix 10C for Trench 13. *[40 CFR 264.304]*

7.4.1 The Action Leakage Rate (ALR) for landfill Trench 11 sumps are 70 gallons/acre-day for Sump D1, 104 gallons/acre-day for Sump D2, 187 gallons/acre-day for Sump D3 and 98 gallons/acre-day for Sump D4; the ALR for landfill Trench Sumps 12A, 12B and 12C are each 150 gallons/acre-day, respectively, for each leak detection sump; and the ALR for landfill Trench 13 is 150 gallons/acre-day for each leak detection sump. *[40 CFR 264.302]*

The Permittee must calculate the gallons/acre-day (GPAD) leachate generation rate for each sump and submit the information along with the liquid level monitoring data and any leachate chemical analyses with the semiannual report required under Permit Condition 10.9.2. The GPAD must be calculated weekly for sumps in trenches during their active life and closure period; and calculated monthly for sumps in trenches during their post-closure period. *[40 CFR 264.302(b)]*

7.4.2 The Permittee must operate the leachate collection and detection systems without the head on any liner exceeding one (1) foot (30 cm). *[40 CFR 264.302(a)]*

7.4.3 The Permittee must monitor each sump as required in the RAPs listed in Permit Condition 7.4, above. *[40 CFR 264.303 and 304]*

7.4.4 The Permittee must remove all pumpable fluids from each sump whenever the pump operating level, as defined in the RAP for that trench and listed below, is reached. The amount of liquids removed must be tracked at least weekly for Trench 13 and monthly for Trench11 and Trench 12. *[40 CFR 264.303]*

- Trench 11 – 1.75 feet
- Trench 12 – 1.75 feet
- Trench 13 – 1.0 foot

7.4.5 The Permittee must notify the Director in writing[i] within seven (7) days of either an exceedance of the Action Leakage Rate (ALR) or the fluid head on either liner exceeding one foot. The notification must be followed by the submittal to the Director of a preliminary written assessment within fourteen (14) days of the exceedance. Within thirty (30) days of the initial notification, the Permittee must submit an analysis of the liquid found in the sump with a summary of the other information required by the RAP for that trench, as listed below. *[40 CFR 264.304(b)]*

7.4.5.1 Trench 11

1. If a breach in the liner system is suspected, the location, size and cause of the breach.
2. Assessment of the seriousness of the leak in terms of potential for escaping into the environment.
3. The location, size and cause of any leak.

[i] A written notification may be submitted electronically.

4. Determine if any other short-term and long-term actions need to be taken to reduce and maintain the flow below the ALR.
5. Thereafter, submit monthly reports to the Division, by the 15th of the month following the reported activity, summarizing the results of any remedial actions taken and actions planned. Continue submitting these reports for as long as the flow rate in the leak detection system (LDS) exceeds the ALR.

7.4.5.2 Trench 12

1. If a breach in the liner system is suspected, the location, size and cause of the breach.
2. Assessment of the seriousness of the leak in terms of potential for escaping into the environment.
3. The location, size and cause of any leak.
4. Determine if any other short-term and long-term actions need to be taken to reduce and maintain the flow below the ALR.
5. Thereafter, submit monthly reports to the Division, by the 15th of the month following the reported activity, summarizing the results of any remedial actions taken and actions planned. Continue submitting these reports for as long as the flow rate in the LDS exceeds the ALR.

7.4.5.3 Trench 13

1. Visually assess the cell for possible damage to the liner system and conduct interviews with personnel about recent practices that might have resulted in a breach in the primary liner.
2. Explanation of the sources of liquids and possible locations of apparent leaks. Comment on mobility of the liquid (and hazardous constituents) in the vadose zone and groundwater and the hazard to the environment and human health represented by the apparent leak.
3. Determine whether waste placement should be modified or curtailed; and whether or not liner inspection, repairs, or controls are feasible.
4. Determine if any other short-term or long-term actions need to be taken to mitigate any apparent leaks.
5. Thereafter, submit monthly reports to the Division, by the 15th of the month following the reported activity, summarizing the results of any remedial actions taken and any actions planned. Continue submitting these reports for as long as the flow rate in the LDS exceeds the ALR

7.5 INSPECTION SCHEDULES AND PROCEDURES

The Permittee must inspect the landfills in accordance with the following conditions:

7.5.1 The Permittee must inspect the liners and cover systems during construction and installation for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials).

[40 CFR 264.303(a)]

7.5.2 The Permittee must inspect the following immediately after construction or installation of a landfill:

1. Synthetic liners and covers must be inspected to ensure tight seams and joints and the absence of tears, punctures, or blisters; and *[40 CFR 264.303(a)(1)]*
2. Soil-based and admixed liners and covers must be inspected for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover. *[40 CFR 264.303(a)(2)]*

7.5.3 The Permittee must inspect the landfill (including the liner and leachate collection system) in accordance with the inspection schedule in Section 4 (Facility Inspection Plan) of the Part B Permit Application and the following: *[40 CFR 264.303(b)]*

7.5.3.1 The landfill must be inspected weekly and within twenty-four (24) hours after a storm event to detect evidence of any of the following:

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

7.6 CELL LOCATION SURVEYING

The Permittee must maintain the following items in the operating record, in accordance with Section 10.8.9 of the Part B Permit Application: *[40 CFR 264.73 and 40 CFR 264.309]*

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

7.7 CLOSURE AND POST-CLOSURE CARE

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

7.7.1 At final closure of the landfill, or upon closure of any cell, the Permittee must follow the procedures in the approved Closure Plan contained in Section 15 of the Part B Permit Application for a scheduled closure and Section 16 of the Part B Permit Application for an unscheduled closure, as required by 40 CFR 264.310(a). *[40 CFR 264.310(a)]*

7.7.2 After final closure of the landfill, the Permittee must follow the plans and procedures in the approved Post-Closure Care Plan in Section 17 (Post-Closure Care Plan) of the Part B Permit Application and Permit Section 13 (Post-Closure Care Conditions), as required by 40 CFR 264.310(b). *[40 CFR 264.310(b)]*

7.8 SPECIAL LANDFILL PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

The Permittee must not place ignitable or reactive waste (including ignitable waste in containers) in a landfill unless it is done in accordance with 40 CFR 264.312(b) and the procedures in Section 10.8.5 (Special Requirements for Ignitable or Reactive Wastes) of the Part B Permit Application are followed. *[40 CFR 264.312]*

7.9 SPECIAL LANDFILL PROVISIONS FOR INCOMPATIBLE WASTES

The Permittee must not place incompatible wastes, or incompatible wastes and materials, in the same landfill cell unless it is done in accordance with 40 CFR 264.17(b) and the procedures specified in Section 10.8.5 (Special Requirements for Ignitable or Reactive Wastes) of the Part B Permit Application are followed. *[40 CFR 264.313]*

7.10 SPECIAL LANDFILL PROVISIONS FOR BULK AND CONTAINERIZED LIQUIDS

7.10.1 The Permittee must not place bulk or non-containerized liquid wastes, or waste containing free liquids (whether or not sorbents have been added) in a landfill. Use of non-hazardous liquids and leachate generated from Trench 13 as dust suppression within the same cell from which it was collected, in accordance with Section 10.8.10 of the Part B Permit Application, is not considered placement in this permit section. *[40 CFR 264.314(a)]*

7.10.2 The Permittee must demonstrate the absence of free liquid in either a containerized or a bulk waste by using the following test: Method 9095B[ii] (Paint Filter Liquids Test) as described in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication SW-846). *[40 CFR 264.314(b)]*

7.10.3 The Permittee must not place containers holding free liquids in a landfill unless:

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

7.10.4 The Permittee must follow the procedures in Section 10.8.2 of the Part B Permit Application to prevent the disposal of liquids in the landfill.

[ii] The most up-to-date version of Method 9095 found in EPA publication SW-846.

7.11 SPECIAL REDUCTION REQUIREMENTS FOR EMPTY CONTAINERS

The Permittee must not dispose of any containers in a landfill unless they are at least 90 percent full when placed in the landfill or they are crushed, shredded, or similarly reduced in volume to the maximum practical extent before burial in the landfill, or they are not larger than one ampule. *[40 CFR 264.315]*

7.12 INTERIM PROCESS LOADS

7.12.1 The Permittee may stage interim process loads, while awaiting verification testing, in accordance with Sections 7.7.4 (Interim Processing Loads) and 10.8.8 (Special Requirements for Interim Processing Loads) of the Part B Permit Application. The interim process loads must be placed in a segregated and separately lined area of the landfill.

7.12.1.1 The practice of using Interim Processing Loads (i.e. put piles) shall cease by December 31, 2029. The Permittee is required to have a Division-approved method for managing waste that is awaiting verification testing in place by this time.

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

The Permittee must dispose of small containers of hazardous waste in over-packed drums (lab packs) in accordance with the detailed plans and procedures contained in Section 10.8.3.1 (Lab Packs) of the Part B Permit Application, as required by 40 CFR 264.316. *[40 CFR 264.316)]*

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

7.14.1 Hazardous wastes F020, F021, F022, F023, F026 or F027 will only be disposed of in the landfill if the waste is shown to meet the treatment standards in 40 CFR 268.

7.14.2 The Permittee must follow the special requirements for these wastes as specified in Section 10.8.7 (Special Requirements for Management of F020, F021, F022, F023, F026, F027 Wastes) of the Part B Permit Application.

7.15 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **close** Trench 13 in accordance with the Trench 13 Landfill Engineering Report, March 2016, including the installation and monitoring of a drainage lysimeter at an appropriate location on the final cover of Trench 13. The referenced document has been adopted herein under Attachment 2 of this Permit.	Within one (1) year after the final placement of waste into Trench 13.

	Task	Date Due
2	The Permittee shall **demonstrate** that the Leachate Collection and Removal System (LCRS) and Leak Detection System (LDS) are functioning properly. Unless otherwise approved, the performance demonstration shall be observed by regulatory staff. ***--- Completed May 9-10, 2017 [Phase A]; Completed May 10-12, 2021 [Phase B]; Completed June 13, 2025 [Phase C]***	Prior to placement of the Operations Layer in each constructed cell at Trench 13
3	The Permittee shall **submit** as-built drawings and the results of the construction and installation QA/QC Plan stamped by a qualified Professional Engineer. This will be required for each construction phase of Trench 13. ***--- Completed June 2017 [Phase A]; Completed July 2021 [Phase B]; Completed June 2025 [Phase C]***	Prior to accepting waste in each constructed cell at Trench 13
4	The Permittee shall **install and analyze** 3 sampling events from one well upgradient and two wells downgradient of each construction phase of Trench 13. [See Table 10.2] ***---Completed June 2017 [Phase A – MW-328, MW-330, MW-331]*** ***---Completed July 2021 [Phase B - MW-328, MW-332, MW-332A, MW-333]*** ***--Completed 2Q2025 [Phase C – MW-328, MW-333, MW-334]***	Prior to accepting waste in each constructed cell at Trench 13
5	The Permittee shall **provide a permit modification** for modifying the cover of Trench 12, as mentioned in Section 17.1.2 of the Permit Renewal Application.	Within one (1) year of issuance of this Permit
6	The Permittee shall **establish** benchmarks for closed Trench 12, measure them annually and provide the results in the Facility's Annual Report, as described in Permit Condition 2.13.4.	Next Annual Report
7	The Permittee shall **evaluate alternative options** for the management and staging of interim loads of treated waste that are awaiting confirmatory analysis prior to final disposal in the landfill. The Permittee shall then **submit** to the Director an assessment including a preferred design and operating procedures for the management of interim loads of treated hazardous waste pending receipt of sampling results demonstrating LDR standards are met (i.e. a "RCRA-compliant LDR Verification Area").	Within one (1) year of issuance of this Permit
8	The Permittee must **review and ensure** that any Permit Conditions and sections of the Part B Permit Application containing information related to the permitted landfills is up to date and meets best management practices.	4.5 years after issuance of this Permit
9	The Permittee must **install and monitor** a lysimeter during the closure of Trench 13, as described in Section 15.6.2.3 (Post	Within thirty (30) days of closure of

	Task	Date Due
	Closure Performance Verification) of the RCRA Part B Permit Renewal Application.	the first phase of Trench 13
10	As described in Section 7.3.6, the Permittee shall **re-evaluate** the run-on and run-off control systems at the facility and upgrade them to a system that is AT LEAST capable of controlling peak discharge of a 100-year storm event and withstanding a 500-year storm event or controlling the largest storm on record at the facility, whichever is larger.	Within two (2) years of issuance of this Permit.
11	*Reserved*	

7A. SUMMARY

The Permittee is allowed to store waste in a waste pile unit subject to the terms and conditions of this Permit, as described in this Section. The waste pile unit is the Waste Staging Pile (WP-1). This unit is located on the outer southeast end of Stabilization Building 2. The Waste Staging Pile is used for the temporary staging of solid RCRA hazardous waste waiting to be shredded, then encapsulated or stabilized in Tank 24 (Pan 8). No treatment of waste is permitted in the waste pile unit.

7A.1 WASTE PILES

The waste pile is identified in Section 11 (Waste Staging Pile) of the Part B Permit Application and summarized in Table 7A.3, below. The waste pile is in an area identified as the Waste Staging Pad and the actual location can be seen on the map in Figure 1-6 (Facility Features) in Section 1 (General Information) of the Part B Permit Application. The maximum amount and types of waste that may be handled are discussed below, in Permit Condition 7A.3.

7A.2 WASTE PILE SPECIFIC INFORMATION TO BE MAINTAINED AT THE FACILITY

The Permittee must maintain at the Facility the following Waste Staging Pile specific documents and information, including all amendments, revisions and modifications to these documents and information. These documents shall be maintained until closure is completed for the Waste Staging Pile and certified by a qualified Professional Engineer.

7A.2.1 The Permittee must maintain the following documentation onsite:

1. Test procedures and results, or other documentation or information, to show that the wastes do not contain free liquids;
2. Sketches, drawings, or data demonstrating compliance with 40 CFR 264.176 (Location of buffer zone); and
3. A description of the procedures used to ensure compliance with 40 CFR 264.257 and 264.17.

7A.3 PERMITTED AND PROHIBITED WASTE IDENTIFICATION

7A.3.1 The Permittee must only stage in the waste pile those hazardous wastes identified in the Part A Permit Application and as detailed in Section 11 (Waste Staging Pile) of the Part B Permit Application. Staging waste in the waste pile at the Facility is subject to the terms and limitations of this Permit. *[See also NAC 444.843 and 444.9453]*

7A.3.2 The Permittee is prohibited from treating waste in waste piles. Treatment is defined as "…any method, technique, or process, including neutralization, designed to change the physical, chemical or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources form the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of, or amenable for recovery, amenable for storage, or reduced in volume." *[40 CFR 260.10]*

7A.3.3 The Permittee must only stage hazardous waste in the waste pile, as listed in Table 7A.3, below, and in accordance with Section 11 of the Part B Permit Application.

Table 7A.3

Waste Pile	Waste Pile (WP) # and Name		Maximum Volume
1	WP-1	Waste Staging Pile	38 yd^3
Reserved			
Total Staging Capacity			**38 yd^3**

7A.3.4 The Permittee must only stage hazardous waste in the waste pile until the end of each operating day, as described in Section 11.7 of the Part B Permit Application.

7A.3.5 The Permittee must perform a Paint Filter Test (EPA method 9095B[i] in SW 846) on all hazardous waste to be placed in WP-1 for which the absence of free liquids cannot be determined by visual inspection.

7A.3.6 Wastes containing the following are prohibited from being staged in WP-1:

[40 CFR 264.250(c)]

1. Liquids;
2. PCBs;
3. VOCs >500 ppm; and
4. Listed F020, F021, F022, F023, F026 or F027 waste.

7A.4 DESIGN AND OPERATING REQUIREMENTS

7A.4.1 The Permittee must not place hazardous waste in the waste pile if they could cause the Waste Staging Pad or its containment system to rupture, leak, corrode, or otherwise fail.

7A.4.2 The Permittee must prevent spills and overflows from the waste pile using the methods described in Section 11 of the Part B Permit Application, as required by 40 CFR 264.250(c).

[40 CFR 264.250(c)]

7A.5 INSPECTION SCHEDULES AND PROCEDURES

7A.5.1 The Permittee must inspect the waste pile, as required by 40 CFR 264.254 and in accordance with Sections 4.2.4 (Waste Pile Inspection) and 11.6 (Inspections) of the Part B Permit Application, including completing the forms in Appendix 4A (Inspection Reports) of the Part B Permit Application, and completing the tasks in Permit Condition 7A.5.2 as part of those inspections.

7A.5.2 The Permittee must inspect the Waste Staging Pad and surrounding area at least once each operating day (at least once every twenty-four (24) hours) for:

1. Waste staged overnight;
2. The presence of free liquids;
3. Signs of spillage;
4. Signs of damage, failure or significant concrete surface spalling; and

[i] The most up-to-date version of Method 9095 found in EPA publication SW-846.

5. The presence of the following prohibited waste: Liquids, PCBs, waste listed as F020, F021, F022, F023, F026 or F027, or waste containing >500 ppm VOCs.

7A.5.3 The Permittee must inspect the Waste Staging Pad and surrounding area at least once each week (at least once every seven (7) days) and within twenty-four (24) hours after a precipitation event to detect evidence of any of the following: *[40 CFR 264.254(b)]*

1. Deterioration or corrosion;
2. The presence of free liquids; and
3. Signs of releases of waste via run-off or wind dispersal.

7A.5.4 The Permittee must document compliance with Permit Conditions 7A.5.1 through 7A.5.3 and place this documentation in the operating record for the Facility.

7A.6 RECORDKEEPING

7A.6.1 The Permittee must place the results of all waste analyses, trial tests and inspections in the operating record. *[40 CFR 264.73]*

7A.6.2 The Permittee must document compliance with 40 CFR 254.17(a) and (b), 264.256 and 264.257 in the Facility operating record, as required by Permit Condition 2.13.1. *[40 CFR 264.17(c)]*

7A.6.3 The Permittee must maintain records of inspections performed as outlined in Permit Conditions 7A.5.1 through 7A.5.3.

7A.7 SPECIAL PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

7A.7.1 The Permittee must not place ignitable or reactive waste in a waste pile unless the procedures specified in Section 11.5 (Managing Incompatible, Ignitable or Reactive Wastes) of the Part B Permit Application are followed and 40 CFR 264.17 is complied with. *[40 CFR 264.256]*

7A.7.2 The Permittee must not place ignitable or reactive waste in a waste pile unless the waste is protected from any material or conditions that may cause the waste to ignite or react.

7A.8 SPECIAL PROVISIONS FOR INCOMPATIBLE WASTE

7A.8.1 The Permittee must not place incompatible waste, or incompatible waste and materials, in the same waste pile unless the procedures specified in Section 11.5 (Managing Incompatible, Ignitable or Reactive Wastes) of the Part B Permit Application are followed and 40 CFR 264.17 is complied with.

7A.8.2 The Permittee must not place hazardous waste in the Waste Staging Pad that has not been decontaminated and that previously held incompatible waste or material. *[40 CFR 264.257]*

7A.9 CLOSURE CARE

7A.9.1 At closure of the Waste Staging Pad, the Permittee must follow the procedures in Sections 15 (Scheduled Closure Plan) and 11.8 (Closure) of the Part B Permit Application for the waste piles identified in Table 7A.3, above, as required by 40 CFR 264.258. *[40 CFR 264.258]*

7A.9.2 If the Permittee demonstrates that not all contaminated portions of the Waste Staging Pad, residuals and/or soil can be practicably removed or decontaminated in accordance with the Scheduled Closure Plan, then the Permittee must close the waste staging pad and perform post-closure care in accordance with 40 CFR 264.258(b).

7A.10 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **submit** to the Division design drawings for the Waste Staging Pad (WP-1).	Prior to placing waste in WP-1
2	The Permittee shall:	*See below.*
2a	**Obtain** a Construction Certification for the WP-1 by a Nevada registered Professional Engineer.	At least thirty (30) days prior to placing waste in WP-1
2b	**Submit** the Construction Certification to the Division.	No more than five (5) days after completing Task 2a.
2c	**Obtain approval** from the Division.	Prior to placing waste in WP-1
3	*Reserved*	

8. SUMMARY

The US EPA's National Waste Minimization Program supports efforts that promote a more sustainable society, reduce the amount of waste generated, and lower the toxicity and persistence of wastes that are generated. The Permittee is required to conduct a Waste Minimization Program in accordance with this Section of the Permit and Section 1.5 (Waste Minimization Program) of the Part B Permit Application.

8.1 WASTE MINIMIZATION RECORD

The Permittee must maintain at the Facility copies of waste minimization documents required in Permit Conditions 8.2 and 8.3 and shall make them available to any authorized representative of NDEP or USEPA conducting an inspection of the Facility.

8.2 WASTE MINIMIZATION CERTIFICATION

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

1. The Permittee has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the Facility operations to the degree, determined by the Permittee, to be economically practicable;
2. The method of treatment, storage, or disposal is the only practicable method or combination of methods currently available to the Facility, which minimizes the present and future threat to human health and the environment;
3. This certification shall be retained with the Facility's operating record and shall comply with the signatory requirements of Permit Condition 1.7; and
4. The Permittee shall send a copy of the annual certification to NDEP[i].

8.3 SOURCE REDUCTION PLANS AND REPORTS

8.3.1 Source Reduction Evaluation Review and Plan

The Permittee must submit[ii] a source reduction evaluation review and plan to the Director. The review and plan should be conducted and prepared in accordance with the procedures and format provided in the EPA Waste Minimization Opportunity Assessment Manual or other equivalent source reduction guidance. The review and plan must include, at a minimum, the following:

[40 CFR 270.32(b)]

1. The name and location of the Facility.
2. The NAIC/SIC Code of the Facility.
3. A copy of any written company policy or statement that outlines the general goals, objectives, and methods of source reduction to be implemented within the next five (5) years.

[i] To be submitted with the Annual Report [Permit Condition 2.13.4(5)].
[ii] To be submitted with the Annual Report [Permit Condition 2.13.4(5)].

4. Identification of all routinely generated hazardous waste streams, which result from ongoing processes or operations. For the purposes of this paragraph, a hazardous waste stream is to be included if it meets the following criteria:
   (a) It is a hazardous waste stream processed in a wastewater treatment unit which discharges to a publicly owned treatment works or under a national pollutant discharge elimination system (NPDES) permit and its weight before treatment exceeds five (5) percent of the weight of the total yearly volume of hazardous waste generated at the site; or
   (b) It is a hazardous waste stream which is not processed in a wastewater treatment unit and its weight exceeds five (5) percent of the weight of the total yearly volume of hazardous waste generated at the site, less the weight of any hazardous waste stream identified in Permit Condition 8.3.1 Item 4(a).
5. For each hazardous waste stream identified in Permit Condition 8.3.1 Item 4, above, the following information shall be included:
   (a) An estimate of the quantity of hazardous waste generated; and
   (b) An evaluation of source reduction approaches available to the Permittee, which are potentially viable. The evaluation shall consider at a minimum the following source reduction approaches:
      (1) Input change;
      (2) Operational improvement;
      (3) Production process change; and
      (4) Product reformulation.
6. Any source reduction and/or recycling measure implemented by the Permittee in the last five (5) years.
7. A specification of, and a rationale for, the technically feasible and economically practicable source reduction measures which will be taken by the Permittee with respect to each waste stream identified. The review and plan shall fully document any statement explaining the Permittee's rationale for rejecting any available source reduction approach identified in Permit Condition 8.3.1 Item 5, above.[iii]
8. A detailed description of any programs the Permittee may have to assist generators of hazardous waste in reducing the volume or quantity and toxicity of wastes they produce.
9. An evaluation, and, to the extent practicable, a quantification, of the effects of the chosen source reduction method on emissions and discharges to the air, water, or land environmental mediums.
10. A description of employee training programs and employee incentive programs for source reduction, which may be in effect at the Facility.
11. A timetable for making reasonable and measurable progress towards implementation of the selected source reduction measures identified in Permit Condition 8.3.1 Item 7, above.
12. A summary of the source reduction evaluation review and plan.

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

13. Certification, as required by 40 CFR 270.11(d), of the review, the plan and the summary by a qualified Professional Engineer, or by an individual who is responsible for the processes and operation of the Facility, or by an environmental assessor, who has demonstrated expertise in hazardous waste management. The engineer, individual, or assessor shall certify the review, the plan and the summary only if the review, the plan and the summary meet all the requirements of Permit Condition 8.3.1.

8.3.2 Certification of Plan Implementation

The Permittee must submit a written statement from a responsible official of the Facility certifying, as required by 40 CFR 270.11(d), that the Permittee has implemented, is implementing, or will be implementing, the source reduction measures identified in the Facility's Source Reduction Plan according to the implementation schedule contained in the plan.

8.3.2.1 The Permittee may determine not to implement a measure selected pursuant to Permit Condition 8.3.1 Item 7, above, only if the Permittee determines, upon conducting further analysis or due to unexpected circumstances, that the selected measure is not technically feasible or economically practicable, or if attempts to implement that measure reveal that the measure would result in, or has resulted in, any of the following: *[40 CFR 264.73(b)(9)]*

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

8.3.3 Source Reduction Plan and Plan Summary Amendments

If the Permittee elects not to implement the measures selected pursuant to Permit Condition 8.3.1 Item 7, above, the Permittee must amend its review, plan, and summary to reflect this rejection; and include in the review, plan, and summary, proper documentation identifying the rationale for this rejection. Any amendments to the review, plan, or summary must be submitted to the Director no later than thirty (30) days prior to implementation of the changes. *[40 CFR 270.32(b)]*

8.3.4 Hazardous Waste Management Performance Report

The Permittee must prepare a hazardous waste management performance report documenting hazardous waste management approaches implemented at the Facility. The report must be prepared in accordance with the EPA Waste Minimization Opportunity Assessment Manual or other equivalent source reduction guidance. The report must be prepared and submitted annually[iv] and include, at a minimum, the following: *[40 CFR 270.32(b)]*

1. The name and location of the Facility;
2. The SIC Code for the Facility;
3. The following information for each waste stream identified pursuant to Permit Condition 8.3.1 Item 4:

   (a) An estimate of the quantity of hazardous waste generated and the quantity of hazardous

[iv] To be submitted with the Annual Report [Permit Condition 2.13.4(5)].

waste managed by the Permittee during the current reporting year and the baseline year. The current reporting year is the calendar year immediately preceding the year in which the report is to be prepared. For the initial report, the baseline year is any calendar year selected by the Permittee for which substantial data is available on waste generation, or on-site or off-site management. Alternatively, the Permittee may select the current reporting year as the initial baseline year. For all subsequent reports, the baseline year is the current reporting year of the immediately preceding report.

(b) An assessment of the effect, during the current year, of each hazardous waste management measure implemented since the baseline year, upon the generation and the on-site and off-site management of hazardous waste. For the initial report, the assessment of the effect required by this condition shall be made for the current year in general terms for any waste management measures implemented in the preceding five (5) years. The report shall consider, but shall not be limited to, measures which use the following approaches:

(1) Source reduction;
(2) Recycling; and
(3) Treatment.

(c) A description of factors during the current reporting year that have affected hazardous waste generation and on-site and off-site hazardous waste management since the baseline year. For the initial report, the description of factors shall be made in general terms for those factors affecting generation and management in the preceding five (5) years. The description shall include, but is not limited to, any of the following:

(1) Changes in business activity;
(2) Changes in waste classification;
(3) Natural phenomena; and
(4) Other factors that have affected either the quantity of hazardous waste generated or on-site and off-site hazardous waste management requirements.

(d) A description of any factors which may have prevented implementation of any aspect of the source reduction plan.

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

8.4 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	*Reserved*	

9. SUMMARY

The Organic Air Emission Standards for hazardous waste treatment, storage, and disposal facilities are defined in Subparts AA, BB and CC of 40 CFR 264. The Permittee is required to manage hazardous waste in accordance with the air emission standards of Subparts AA, BB and CC of 40 CFR 264, as applicable. Subpart AA contains emission standards for process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or stream stripping operations that process hazardous waste with an annual average total organic concentration of at least ten (10) parts per million by weight (ppmw). Subpart BB contains emission standards that address leaks from specific equipment (i.e. pumps, valves, compressors, etc.) that contains or contacts hazardous waste with an organic concentration of at least ten (10) percent by weight. Subpart CC contains emission standards for tanks, containers, surface impoundments and Subpart X units that store and/or treat hazardous waste that has a volatile organic concentration (VOC) of at least 500 parts per million by weight (ppmw) at the "point of waste origination."

At the time this permit was issued, no Hazardous Waste Management Unit (HWMU) subject to 40 CFR 264 Subpart AA (for process vents) was permitted at the Facility. The Permittee must comply with 40 CFR 264 Subpart BB (for equipment leaks) as it applies to the PCB Storage Tanks (T-4, T-5, T-6 and T-7), which may handle waste with ten (10) percent or more by weight of organic concentration in accordance with Sections 9.2 (PCB Storage Tanks) and 9.8.2 (Subpart BB) of the Part B Permit Application. The Permittee must comply with 40 CFR 264 Subpart CC as it applies to containers of hazardous waste with volatile organic compound (VOC) concentrations over 500 ppmw in accordance with Sections 8.2.7 (Air Emission Standards) and 9.8.3 (Subpart CC) of the Part B Permit Application. No waste with a concentration greater than 500 ppmw VOCs may be stored or treated in tanks or waste piles at this facility.

9.1 ORGANIC AIR EMISSION STANDARDS

9.1.1 Prior to constructing any Hazardous Waste Management Unit (HWMU) with process vents subject to the requirements of 40 CFR 264 Subpart AA, the Permittee must apply for a permit modification, as described in Permit Condition 1.2.1, and provide the specific Part B information required under 40 CFR 270.14-17 and 270.24, as applicable, with the modification request.

9.1.2 Prior to modifying the existing or installing any additional equipment subject to the requirements of 40 CFR 264 Subpart BB, the Permittee must apply for a permit modification, as described in Permit Condition 1.2.1, and provide the specific Part B information required under 40 CFR 270.14-17 and 270.25, as applicable, with the modification request.

9.1.3 Prior to modifying the existing or installing any new container management area, tank, surface impoundment or miscellaneous unit subject to 40 CFR 264 Subpart CC, the Permittee must apply for a permit modification, as described in Permit Condition 1.2.1, and provide the specific Part B information required under 40 CFR 270.14-17, 270.23 and 270.27, as applicable, with the modification request.

9.1.4 The Permittee must also maintain compliance with the active Air Quality Operating Permit issued to the facility by the Division's Bureau of Air Pollution Control.

9.2 APPLICABILITY

40 CFR 264 Subpart AA establishes air emission controls for process vents associated with operations that manage hazardous wastes with an annual average total organic concentration of at least ten (10) ppmw. 40 CFR 264 Subpart BB establishes air emission controls for equipment that contains or contacts hazardous wastes with organic concentrations of at least ten (10) percent by weight for at least 300 hours per calendar year. 40 CFR 264 Subpart CC establishes air emission controls for containers, tanks, surface impoundments, or miscellaneous units subject to 40 CFR 264 Subparts I, J, K or X that manage hazardous waste with an average VOC concentration of at least five-hundred (500) parts per million by weight (ppmw) at the point of waste origination (i.e. when the waste is accepted for delivery or taken possession of by the Permittee).

The Conditions of this Permit Section apply to the HWMUs (Tank Equipment and Container Management Units (CMUs)) identified below, for which the required control equipment has been installed and is operational. HWMUs that are not listed in Table 9.2 are prohibited from managing or coming in contact with hazardous waste that contains organic concentrations that would make Subparts AA, BB and/or CC of 40 CFR 264 applicable to them.

Table 9.2 – Hazardous Waste Management Units for which Subpart BB or CC Applies

Unit #	Waste Management Area	Type of Unit	Air Emission Control Requirements
Tank 4	PCB Storage Tank (T-4)	Tank Storage (PCB)	Subpart BB [Level 1 Controls]
Tank 5	PCB Storage Tank (T-5)	Tank Storage (PCB)	Subpart BB [Level 1 Controls]
Tank 6	PCB Storage Tank (T-6)	Tank Storage (PCB)	Subpart BB [Level 1 Controls]
Tank 7	PCB Storage Tank (T-7)	Tank Storage (PCB)	Subpart BB [Level 1 Controls]
CMU 1	PCB/RCRA Processing and DEA Storage Building	Container Storage	Subpart CC [Level 1 or 2 Controls]
CMU 6	Dry Hazardous Waste Storage Area #2 (DHWSA 2)	Container Storage	Subpart CC [Level 1 or 2 Controls]
CMU 7	Bin Storage Pad	Container Storage	Subpart CC [Level 1 or 2 Controls]
CMU 16	Container & Tank Management Building #1 (CMS 1)	Container Storage	Subpart CC [Level 1 or 2 Controls]
CMU 17	Dry Hazardous Waste Storage Area #3 (DHWSA 3)	Container Storage	Subpart CC [Level 1 or 2 Controls]
CMU 19	Container & Tank Management and Storage Building #2 (CMS 2)	Container Storage	Subpart CC [Level 1 or 2 Controls]

Unit #	Waste Management Area	Type of Unit	Air Emission Control Requirements
CMU 20	Satellite Laboratory 2	Container Storage	Subpart CC [Level 1 or 2 Controls]
CMU 21	Dry Hazardous Waste Storage Area #4 (DHWSA 4)	Container Storage	Subpart CC [Level 1 or 2 Controls]
	Reserved		*Reserved*

9.2.1 The Permittee must use the procedures specified in 40 CFR 264.1034(d) to determine if a process vent is subject to the Subpart AA air emission standards.

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

9.2.3 The Permittee must use the procedures specified in 40 CFR 264.1080, 264.1082 or documentation submitted by the Generator of the waste to determine if a waste stream requires Subpart CC air emission controls.

1. When using Generator supplied information, the determination shall be made in accordance with 40 CFR 264.1083 and Section 7.3 (Pre-Acceptance Review) of the Part B Permit Application.
2. If an exemption is based on 40 CFR 264.1082(c)(1), then the VOC concentration of the hazardous waste streams shall be reviewed at least once every twelve (12) months.

9.3 EMISSION CONTROL TECHNOLOGY

9.3.1 The Permittee must install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information and reports as contained in Sections 8.2.7 (Container Management – Air Emission Standards), 9.8 (Tank Systems – Subpart AA, BB and CC Standards) and 4 (Facility Inspection Plan) of the Part B Permit Application, as required by 40 CFR 264 Subparts AA, BB and CC.

9.4 OPERATING REQUIREMENTS – TANK EQUIPMENT (40 CFR 264 SUBPART BB)

9.4.1 The Permittee must maintain compliance with and follow the procedures in Section 9.8.2 (Tank Systems – Subpart BB) of the Part B Permit Application, as required by 40 CFR 264 Subpart BB.

9.4.2 Each piece of tank equipment subject to 40 CFR 264 Subpart BB shall be marked in such a manner that it can be distinguished readily from other pieces of equipment. *[40 CFR 264.1050(d)]*

9.4.3 The Permittee shall control air pollution emissions from the tank equipment subject to this Permit Section, in accordance with 40 CFR 264.1052 through 264.1062, as applicable to the equipment.

9.5 OPERATING REQUIREMENTS – CONTAINERS (40 CFR 264 SUBPART CC)

9.5.1 The Permittee must maintain compliance with and follow procedures in Section 8.2.7 (Container Management – Air Emission Standards) of the Part B Permit Application, as required by 40 CFR 264 Subpart CC.

9.5.2 The Permittee shall control air pollutant emissions from each container subject to this Permit Section, in accordance with the following requirements, as applicable to the container.

[40 CFR 264.1086(b)(1)]

9.5.2.1 For a container having a design capacity greater than twenty-six (26) gallons and less than 119 gallons, the Permittee shall control air pollutant emissions from the container in accordance with the Container Level 1 standards specified in Permit Condition 9.5.3, below.

9.5.2.2 For a container having a design capacity greater than one-hundred nineteen (119) gallons that is not in light material service, the Permittee shall control air pollutant emissions from the container in accordance with the Container Level 1 standards specified in Permit Condition 9.5.3, below.

9.5.2.3 For a container having a design capacity greater than one-hundred nineteen (119) gallons that is in light material service, the Permittee shall control air pollutant emissions from the container in accordance with the Container Level 2 standards specified in Permit Condition 9.5.4, below.

9.5.3 Container Level 1 Standards *[40 CFR 264.1086(c)]*

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

[40 CFR 264.1086(c)(1)]

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

9.5.3.1.1.1 For the purpose of complying with this Section, no exceptions to the 49 CFR Part 178 or 179 regulations are allowed except:

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

9.5.3.1.2 A container equipped with cover and closure devices that form a continuous barrier over the container openings, such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container (e.g., a lid on a drum or a suitably

secured tarp on a roll-off box) or may be an integral part of the container structural design (e.g., a "portable tank" or bulk cargo container equipped with a screw type cap).

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

9.5.3.2 A container using Container Level 1 controls must have a cover or closure device that is compatible with the waste and the intended management of the container.

[40 CFR 264.1086(c)(2)]

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

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

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

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

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

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

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

9.5.3.3.2.2 In the case when discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container as defined by 40 CFR 261.7(b), the Permittee must promptly secure the closure devices in the closed position and install covers as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within

fifteen (15) minutes or the person performing the operation leaves the immediate vicinity of the container, whichever occurs first.

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

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

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

9.5.4 Container Level 2 Standards *[40 CFR 264.1086(d)]*

9.5.4.1 A container using Container Level 2 standards is one of the following:

[40 CFR 264.1086(d)(1)]

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

9.5.4.1.1.1 For the purpose of complying with this Section, no exceptions to the 49 CFR Part 178 or 179 regulations are allowed except:

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

9.5.4.1.2 A container that operates with no detectable organic emissions as defined in 40 CFR 265.1081 and determined in accordance with the procedure specified in 40 CFR 264.1086(g).

9.5.4.1.3 A container that has been demonstrated within the preceding twelve (12) months to be vapor tight by using 40 CFR Part 60, Appendix A, Method 27 in accordance with the procedure specified in 40 CFR 264.1086(h).

9.5.4.2 Transfer of hazardous waste in or out of a container using Container Level 2 controls must be conducted in such a manner as to minimize exposure of the hazardous waste and good engineering and safety practices for handling flammable, ignitable, explosive, reactive, or other hazardous materials. *[40 CFR 264.1086(d)(2)]*

9.5.4.3 Whenever handling a container using Container Level 2 controls, the Permittee must install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as follows: *[40 CFR 264.1086(d)(3)]*

9.5.4.3.1 Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material to the container as follows: *[40 CFR 264.1086(d)(3)(i)]*

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

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

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

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

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

9.5.4.3.2.2 In the case where discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container as defined by 40 CFR 261.7(b), the Permittee must promptly secure the closure devices in the closed position and install covers, as applicable to the container upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the operation leaves the immediate vicinity of the container, whichever comes first.

9.5.4.3.3 Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities (e.g., sampling) other than transfer of hazardous waste. Following

completion of the activity, the Permittee must promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.

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

9.5.4.3.5 Opening of a safety device, as defined in 40 CFR 265.1081, is allowed at any time conditions require doing so to avoid an unsafe condition.

9.6 INSPECTION AND REPORTING REQUIREMENTS

9.6.1 The Permittee must inspect all equipment subject to Subpart BB standards as follows:

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

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

9.6.1.3 The Permittee must comply with the reporting requirements, as applicable, provided in 40 CFR 264.1065 pertaining to all equipment subject to Subpart BB standards, as specified in Permit Condition 2.13.4 Item 9.

9.6.1.3.1 Detected leaks must be reported to the Division within twenty-four (24) hours of detection.

9.6.2 The Permittee must inspect containers subject to Subpart CC, using Container Level 1 or 2 controls, and their covers as follows:

9.6.2.1 Containers accepted at the Facility which are not empty per 40 CFR 261.7(b), shall be visually inspected within twenty-four (24) hours of acceptance. Each container and its cover must be inspected for visible cracks, holes, gaps or other open spaces when the cover or closure device is secured in the closed position. If a defect is detected, the Permittee must repair the defect in accordance with Permit Condition 9.6.2.2.

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

9.6.2.3 Visual inspections, monitoring, and all recordkeeping requirements must be met for each unit to ensure compliance with 40 CFR 264.1088 and 264.1089.

9.6.3 The Permittee must report to the Director within seven (7) days any unit that is not listed in Table 9.2 and is managing hazardous waste such that 40 CFR 264 Subpart AA, BB or CC should apply to that unit.

9.6.4 A monitoring and inspection schedule and procedures must be submitted to the Director, no later than thirty (30) calendar days prior to the anticipated start-up of any new Subpart AA, BB or CC unit or emissions control technology on existing units. The inspection schedule and procedures must be approved by the Director prior to any continuous or intermittent operations.

9.6.5 The Permittee must apply for a Permit modification under 40 CFR 270.42 as described in Permit Condition 1.2.1 for any new activity or unit subject to 40 CFR 264 Subpart AA, BB or CC, requiring management under this.

9.7 RECORDKEEPING REQUIREMENTS

9.7.1 The Permittee must maintain in the operating record for tank equipment management at the Facility the following information required by 40 CFR 264.1064, as applicable, pertaining to all equipment subject to Subpart BB standards:

9.7.1.1 Equipment identification number and hazardous waste management unit identification;

9.7.1.2 Approximate locations within the Facility (e.g., identify the hazardous waste management unit on a facility plot plan), as shown in Figure 9-1 of the Part B Permit Application and the PCB Facility Piping Schematic and Associated Joint and Connection Identifiers in Appendix 9A of the Part B Permit Application;

9.7.1.3 Type of equipment (e.g., a pump or pipeline valve);

9.7.1.4 Percent-by-weight total organics in the hazardous waste stream at the equipment;

9.7.1.5 Hazardous waste state at the equipment (e.g., gas/vapor or liquid); and

9.7.1.6 Method of compliance with the standard (e.g., “monthly leak detection and repair” or “equipped with dual mechanical seals”) as shown in Appendix 4A (Tanks 4, 5, 6 and 7 – Joints and Tags) of the Part B Application.

9.7.2 The Permittee must maintain in the operating record for container management at the Facility the following information, as applicable, pertaining to all containers subject to Subpart CC standards:

9.7.2.1 A copy of the procedure used to determine that containers with a capacity of 119 gallons or greater, which do not meet applicable DOT regulations as specified in 40 CFR 264.1086(f), are not managing hazardous waste in light service.

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

9.7.2.3 For containers used at the Facility to manage hazardous wastes covered by this Permit Section, sufficient information must be provided to describe:

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

9.7.2.4 Type of equipment (e.g., a pump or a pipeline valve);

9.7.3 The Permittee must maintain at the Facility until closure of the Facility is completed and certified by a qualified Professional Engineer, the following air emission control documents and information, including all amendments, revisions and modifications to these documents and information:

9.7.3.1 Identification of each area that manages waste subject to 40 CFR 264 Subpart AA, BB or CC controls and the Permittee's certification that the requirements of the applicable Subpart are met.

9.7.3.1.1 The Facility must document whether the containers subject to Subpart CC are subject to Level 1, Level 2 or Level 3 requirements; and

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

9.8 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **provide**, as an addition to Section 9.8 (Tank Conditions – Subpart AA, BB, CC Standards) of the Part B Permit Application, a description of the procedures used to determine if equipment is subject to Subpart BB demonstrating compliance with 40 CFR 264.1063(d) for review and approval by the Division.	Within 180 days of the effective date of this Permit

	Task	Date Due
2	The Permittee shall **provide**, as an addition to Section 9.8 (Tank Conditions – Subpart AA, BB and CC Standards) of the Part B Permit Application, a list of equipment to which 40 CFR 264 Subpart BB applies including [40 CFR 264.1064], for review and approval by the Division: • Equipment identification numbers[i]; • Identification of the permitted HWMU(s) the equipment is part of; • Type of equipment (e.g., a pump or pipeline valve); • Percent-by-weight total organics in the hazardous waste stream at the equipment; • Hazardous waste state at the equipment (e.g., gas/vapor or liquid); and • Method of compliance with the standard (e.g., "monthly leak detection and repair" or "equipped with dual mechanical seals").	Within 180 days of the effective date of this Permit
3	The Permittee shall **provide**, as an addition to Section 9.8 (Tank Conditions – Subpart AA, BB, CC Standards) of the Part B Permit Application, details of an emission monitoring plan for equipment subject to 40 CFR 264 Subpart BB demonstrating compliance with Method 21 in 40 CFR Part 60, Appendix A. The monitoring plan must include: monitoring point(s) (including figures of monitoring locations), monitoring methods for control devices, monitoring frequency, procedures for documenting any exceedance, and procedures for mitigating noncompliance for review and approval by the Division.	Within 180 days of the effective date of this Permit
4	The Permittee shall **provide**, as an addition to the inspection schedule in Section 4 (Facility Inspection Plan) of the Part B Permit Application, the inspections and monitoring of equipment subject to 40 CFR 264 Subpart BB demonstrating compliance with the applicable equipment standards described in 40 CFR 264.1052 through 264.1064 for review and approval by the Division.	Within 180 days of the effective date of this Permit
5	The Permittee shall **provide**, as an addition to Appendix 4A (Facility Inspections) of the Part B Permit Application, copies of the inspection and monitoring forms for equipment subject to 40 CFR 264 Subpart BB demonstrating compliance with 40 CFR 264.1064 for review and approval by the Division.	Within 180 days of the effective date of this Permit

[i] These numbers must match the numbers for "joints and connections" provided in the AquAeTer piping schematic in Appendix 9A of the Part B Permit Application.

	Task	Date Due
	Reserved	

10. SUMMARY

The Permittee is required to conduct a Groundwater Detection Monitoring Program, in compliance with 40 CFR 264.98. The existence of pre-RCRA Solid Waste Management Units (SWMUs) and active hazardous waste landfills were grounds for requiring the Permittee to maintain a Groundwater Detection Monitoring Program.

The Permittee is also required to conduct leachate monitoring for landfill Trenches 11, 12 and 13. The existence of closed and active hazardous waste landfills were grounds for requiring leachate monitoring.

10.1 GROUNDWATER DETECTION MONITORING

A description of the Facility, defining onsite, offsite and the "Point of Compliance" (POC) (see 40 CFR 264.95) is identified by the legal description of the Facility, as contained in Section 1.1.1 (Site Legal Description) and shown in Figure 13-1 (Environmental Monitoring Systems) of Section 13 (Environmental Monitoring Plan), both in the Part B Permit Application. This Groundwater Detection Monitoring System may ultimately be comprised of as few as thirty-three (33) wells and currently includes twenty-nine (29) installed groundwater monitoring wells (twenty-four (24) upper aquifer wells and five (5) lower aquifer wells). Three (3) of the groundwater monitoring wells, one upgradient (MW-328) and two downgradient (MW-331 and MW-332) from Phase A of Trench 13, were installed during the 3rd Quarter of 2016. One (1) additional well (MW-330), determined to not be in the same flow regime as the other Trench 13 monitoring wells, was installed during the 1st Quarter of 2017. Two (2) other wells, one (1) downgradient from Phase B of Trench 13 (MW-332A) and one (1) downgradient from both Phase B and Phase C of Trench 13 (MW-333), were installed during 1st Quarter of 2019 and 2nd Quarter of 2020, respectively. One (1) additional well (MW-334), downgradient of Phase C of Trench 13, was installed during the 3rd Quarter of 2024. At least two (2) new groundwater monitoring wells will be installed downgradient from each phase of Trench 13, in conjunction with the future construction phases of Trench 13.

The GWPS values for the constituents and parameters are listed in Tables 10.4A, 10.4B and 10.4C, below, and will be used to detect releases from landfill Trenches 11, 12 and 13 and the pre-RCRA SWMUs including Trenches 1 through 10.

The leachate monitoring currently includes ten (10) existing pairs of leachate sumps (four in Trench 11, three in Trench 12 and three in Trench 13). Two (2) additional pairs of leachate sumps are to be installed at Trench 13, one pair for each construction phase. The leachate monitoring is described in Permit Condition 10.4.1.3, below.

10.2 POINT OF COMPLIANCE

The Point of Compliance (POC) is established as described in the Permit Section 10 Summary, above. All wells identified herein as POC wells, or installed for that purpose subsequent to Permit issuance, are considered reflective of the conditions at the Point of Compliance. For the purposes of determining whether the Facility complies with the Groundwater Protection Standards (GWPS) established herein, any exceedance of the GWPS identified in Tables 10.4A, 10.4B or 10.4C requires compliance with Permit Conditions 10.9.4 and 10.9.5.

10.3 WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee must install and maintain the groundwater monitoring system as required by 40 CFR 264.97, as specified in Section 13 (Environmental Monitoring Plan) of the Part B Permit Application, and as summarized below.

10.3.1 The Permittee must install and maintain groundwater monitoring wells at the locations specified on the map in Figure 13-1 of the Part B Permit Application Section 13 (Environmental Monitoring Plan) and in conformance with Table 10.3, below. *[40 CFR 264.97(a)]*

Table 10.3

Monitoring Well Identification		Designation
1	001	POC
2	002	POC
3	308	POC
4	309	POC
5	310	POC
6	311	POC
7	313	Background
8	315A	POC
9	316	POC
10	317	POC
11	318	Background
12	319	Background
13	320	POC
14	322	POC
15	324	POC
16	325	POC
17	326	POC
18	327[i]	POC
19	328	Background
20	330[ii]	POC
21	331	POC
22	332[iii]	POC
23	332A	POC
24	333	POC
25	334	Planned POC

[i] One year prior to construction of Trench 13 Phase E, Monitoring Well 327 will be evaluated to determine if a replacement or abandonment is needed.

[ii] Monitoring Well 330 was installed at the southeast corner of Trench 13 as a downgradient POC well for Phase A. However, the resulting water chemistry suggests this well was completed in a different aquifer than the other wells. In addition, Monitoring Well 329 was initially planned for installation on the eastern edge of Trench 13. However, based on results from Monitoring Well 330, directly downgradient of the proposed location, it was determined not to install Monitoring Well 329.

[iii] Monitoring Well 332, as initially completed, does not yield adequate water for sampling. The well will be utilized as a sentinel well for the detection of any potential organic constituents. Another monitoring well, MW332A, was installed further south of Phase B.

Monitoring Well Identification		Designation
26	335[iv]	Planned POC
27	336	Planned POC
28	337	Planned POC
29	600 [Bkgd]	Supplemental ~ Lower Aquifer
30	601	Supplemental ~ Lower Aquifer
31	603	Supplemental ~ Lower Aquifer
32	604	Supplemental ~ Lower Aquifer
33	605	Supplemental ~ Lower Aquifer

10.3.2 The Permittee must maintain the monitoring wells identified in Permit Condition 10.3.1, in accordance with the detailed plans and specifications presented in Section 13 (Environmental Monitoring Plan) of the Part B Permit Application. *[40 CFR 264.97(a)]*

10.3.3 The Permittee must maintain borehole integrity of each monitoring well identified in Table 10.3, as required by 40 CFR 264.97(c).

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

10.3.5 All new and replacement wells must be drilled and constructed as approved by the Division. A well installation work plan must be submitted to the Department, for approval, for all new and replacement monitoring wells. The Permittee must not begin drilling until the Division approval has been granted. All new and replacement monitoring wells must be designed, constructed, and installed in accordance with Nevada's Monitoring Well Installation Regulations (NRS 445A.660, NAC 534); and, as appropriate, in general accordance with current guidance from the Division and the EPA for drilling and construction of groundwater monitoring wells.

10.3.5.1 The Permittee must take all reasonable precautions during drilling to prevent cross-contamination between the water-bearing hydrologic zone and the geologic zones overlying and underlying the hydrologic zone.

10.3.5.2 For all new replacement monitoring wells, the Permittee must record, with as-built drawings, the total depth of the well and elevations of the following:

1. Top of the casing;
2. Ground surface and/or apron; and
3. Protective casing.

[iv] Monitoring Well 335 must be installed and three (3) quarterly samples collected and analyzed before waste is accepted for disposal in Phase D of Trench 13. Monitoring Wells 336 and 337 must be installed and three (3) quarterly samples collected and analyzed from each well before waste is accepted for disposal in Phase E of Trench 13.

10.3.6 The Permittee must submit to the Division within sixty (60) calendar days of installation of any new or replacement monitoring well, or decommissioning of an existing monitoring well, revised versions of Figure 13-1, and any other listing/description of the groundwater monitoring wells in Section 13.3.1 and Table 13-1 of the Part B Permit Application. The Permittee must obtain a permit modification for any new or replacement monitoring well.

10.4 INDICATOR PARAMETERS AND MONITORING CONSTITUENTS

10.4.1 The Permittee must monitor all wells listed in Table 10.3 for the parameters and constituents listed in Tables 10.4A, 10.4B and 10.4C in accordance with Permit Conditions 10.4.1.1 and 10.4.1.2. *[40 CFR 264.98(a)]*

10.4.1.1 All Point of Compliance (POC) and background wells in Table 10.3 must be sampled quarterly for the parameters and constituents listed in Table 10.4A; and sampled annually for the constituents listed in Table 10.4B. Wells[v] MW-001, MW-002, MW-313, MW-319, MW-320, MW-322, MW-324, MW-325, MW-326 and MW-327 must be sampled semiannually for the radioisotopes listed in Table 10.4C.

10.4.1.2 All Supplemental Wells must be sampled every five (5) years for the parameters and constituents in Tables 10.4A, 10.4B and 10.4C.[vi]

10.4.1.3 All leachate sumps must be sampled and monitored quarterly for the parameters and constituents listed in Table 10.4D, as described in Permit Conditions 7.3.9 and 7.4.2 and Section 13.5 of the Part B Permit Application.

Table 10.4A – Quarterly Monitoring

Parameter or Constituent		GWPS[vii] [mg/L]
1	Arsenic (dissolved)	0.020
2	Barium (dissolved)	0.20
3	Cadmium (dissolved)	0.0035
4	Chromium (dissolved)	0.21
5	Lead (dissolved)	0.010
6	Mercury (dissolved)	0.0002
7	Selenium (dissolved)	0.015
8	Silver (dissolved)	0.003
9	Cyanide (total)	0.014
10	Fluoride	4.4
11	Sodium	280
12	Sulfate	260

[v] These are the background wells and wells adjacent to or downgradient from the closed Low-Level Radioactive Waste (LLRW) site.

[vi] Based on USEN's justification, as provided in a review of groundwater conditions conducted by and described in a letter (dated August 25, 2010) from AquAeTer, the Director has waived the requirement to sample the Supplemental Wells 600, 601, 603, 604 and 605 more often than once every five (5) years. However, these wells must be maintained per Permit Condition 10.3.1. The next sampling of the Supplemental Wells is due by 2nd Quarter 2027.

[vii] All of these GWPS values were established from background data obtained in 2019 to 2023. The GWPS values for all of the metals were found using the "dissolved" metal concentrations.

Parameter or Constituent		GWPS[vii] [mg/L]
13	Chloride	82
14	TOC	1.2
15	pH	7 < pH < 8
16	Specific Conductance	< 1200 µmhos
17	Nitrate-Nitrite as N	0.51

Table 10.4B - Annual Monitoring[viii]

Constituent		GWPS[ix] [mg/L]
1	Endrin [$C_{12}H_8Cl_6O$, 1,2,3,4,10,10-hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-1,4-endo,endo- 5,8-dimethanonaphthalene]	0.0002
2	Lindane [$C_6H_6Cl_6$, 1,2,3,4,5,6-hexachlorocyclohexane, gamma isomer]	0.004
3	Methoxychlor [$C_{16}H_{15}Cl_3O_2$, 1,1,1-Trichloro-2,2-bis(4-methoxyphenyl)ethane]	0.100
4	Toxaphene [$C_{10}H_{10}Cl_6$, Technical chlorinated camphene, 67-69% chlorine by weight]	0.005
5	2,4-D [$C_8H_6Cl_2O_3$, 2,4-Dichlorophenoxyacetic acid]	0.100
6	2,4,5-TP (Silvex) [$C_9H_7Cl_3O_3$, 2-(2,4,5-Trichlorophenoxy)propionic acid]	0.010

Table 10.4C - Semiannual Monitoring (Radioisotopes)

Radioisotope		GWPS [pCi/L]
1	Radium 226 / Radium 228	5 (Combination of Radium 226 & 228)
2	Tritium	125

Table 10.4D – Leachate Monitoring

Constituent	
1	All Constituents listed in Tables 10.4A and 10.4B
2	Chloroform
3	Tetrachloroethene
4	1,1,1-Trichlorethane
5	Trichlorofluoromethane
6	Toluene
7	Total PCBs
8	Acetone
9	Carbon Tetrachloride
10	Trichloroethene

[viii] The sampling frequency for herbicides / pesticides has been reduced to annual due to the very low rate of occurrence and concentration of these constituents in the leachate.

[ix] GWPS values are from Table 1 in 40 CFR 264.94(a)(2).

10.4.2 For those parameters and constituents in Tables 10.4A, 10.4B and 10.4C for which no GWPS values are established at the time this Permit is issued, the Permittee must establish GWPS values, using the background well(s), in accordance with the following:[x] *[40 CFR 264.97(g)]*

10.4.2.1 A sequence of at least four (4) samples, taken at an interval that assures, to the greatest extent technically feasible, that an independent sample is obtained, by reference to the uppermost aquifer's effective porosity, hydraulic conductivity, and hydraulic gradient, and the fate and transport characteristics of the potential contaminants; or

10.4.2.2 An alternative sampling procedure proposed by the Permittee and approved by the Director.

10.4.3 The Permittee must take a sufficient number and volume of samples from each well to analyze for each parameter and/or constituent identified in Tables 10.4A, 10.4B and 10.4C each time the system is sampled. *[40 CFR 264.97(g)]*

10.4.3.1 Background groundwater quality for monitoring parameters or constituents must be based on data from quarterly (Table 10.4A), annual (Table 10.4B) or semiannual (Table 10.4C) sampling of Wells 313, 318, 319 and 328. *[40 CFR 264.97(g)]*

10.4.3.2 The Permittee must recalculate the Groundwater Protection Standards established in Tables 10.4A, 10.4B and 10.4C and include such calculations every five (5) years[xi] in accord with 40 CFR 270. The recalculation must include data obtained from the background well(s), which will be used by the Director to assist in establishing a background limit for each parameter or constituent monitored; alternatively, the Director may accept another suitable method of establishing the Groundwater Protection Standards which the Permittee can request through a permit modification following the procedures outlined in Permit Condition 1.2.1.

10.5 SAMPLING AND ANALYSIS PROCEDURES

The groundwater monitoring program must include sampling and analysis procedures that accurately measure hazardous constituents in groundwater and that are designed to ensure monitoring results that provide a reliable indication of the groundwater below the hazardous waste management area. The Permittee must use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Permit Condition 10.3. *[40 CFR 264.97(d) and (e)]*

10.5.1 Samples must be collected using the techniques described in the Appendix 13B (Sampling and Analysis Plan) of the Environmental Monitoring Plan in the Part B Permit Application.

10.5.2 Samples must be preserved and shipped (when shipped off site for analysis), in accordance with the procedures specified in Appendix 13B (Sampling and Analysis Plan) of the Environmental Monitoring Plan in the Part B Permit Application.

[x] Until a GWPS is established, the concentrations found for these parameters and constituents will be compared to the concentrations found in the background well during the same quarter.

[xi] First recalculation will be due within five (5) years from issuance of this permit.

10.5.3 Samples must be analyzed in accordance with the procedures specified in Appendix 13B (Sampling and Analysis Plan) of the Environmental Monitoring Plan in the Part B Permit Application.

10.5.4 Samples must be tracked and controlled using the chain-of-custody procedures specified in Appendix 13B (Sampling and Analysis Plan) of the Environmental Monitoring Plan in the Part B Permit Application.

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

10.6 ELEVATION OF THE GROUNDWATER SURFACE

10.6.1 The Permittee must determine the elevation of the groundwater surface at each well each time the groundwater is sampled, in accordance with Permit Condition 10.5 and Section 13 (Environmental Monitoring Plan) of the Part B Permit Application. *[40 CFR 264.97(f)]*

10.7 MONITORING PROGRAM AND DATA EVALUATION

10.7.1 The Permittee must collect, preserve, and analyze samples pursuant to Permit Conditions 10.4, 10.5 and 10.6.

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

10.7.2.1 The Permittee must express the groundwater quality at each monitoring well in a form necessary for the determination of statistically significant increases (i.e., means and variances). *[40 CFR 264.97(h)]*

10.7.3 The Permittee must determine the groundwater flow rate and direction in the uppermost and lower aquifers semiannually and submit the results to the Director per Permit Condition 10.9.3. *[40 CFR 264.98(e)]*

10.7.4 The Permittee must determine whether there is a statistically significant increase (SSI) over the GWPS for each parameter identified in Tables 10.4A, 10.4B and 10.4C each time groundwater quality is determined at the compliance point (quarterly for Table 10.4A, annually for Table 10.4B and semiannually for Table 10.4C). In determining whether such an increase has occurred, the Permittee must compare the groundwater quality at each monitoring well specified in Table 10.3 to the GWPS values specified in Tables 10.4A, 10.4B and 10.4C, in accordance with the procedures specified in Permit Condition 10.8. If GWPS values have not been established for a parameter, then the value at each monitoring well specified in Table 10.3 will be compared to the background values at Wells 313, 318, 319 and 328 (for wells downgradient from Trench 13) for that sampling event. *[40 CFR 264.98(f)]*

10.7.5 The Permittee must perform the evaluations described in Permit Condition 10.7.4 within thirty (30) days after receiving the sampling results from the laboratory.

10.8 STATISTICAL PROCEDURES

10.8.1 A statistically significant increase (SSI) is determined by comparing each groundwater monitoring result to the corresponding GWPS value in Tables 10.4A, 10.4B and 10.4C. If the value of the groundwater data is higher than its respective GWPS limit, then the Permittee shall:

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

10.8.1.2 Compare the results obtained to the GWPS limits in Tables 10.4A, 10.4B and 10.4C. If the results of the resample are higher than the GWPS, such that two consecutive results exceed the GWPS, then the Permittee shall comply with Permit Conditions 10.9.4 and/or 10.9.5.

10.8.1.3 The Permittee must perform the evaluations described in Permit Condition 10.8.1 within thirty (30) days after receipt of quarterly groundwater analytical results. *[40 CFR 264.98(f)(2)]*

10.9 RECORDKEEPING AND REPORTING

10.9.1 The Permittee must enter all field equipment calibration data, monitoring, testing, and analytical data obtained in accordance with Permit Condition 10.4 in the operating record. The data must include all computations, calculated means, variances, and tests of distribution results.
[40 CFR 264.73(b)(6)]

10.9.2 The Permittee must submit to the Director the analytical and field data results required by Permit Condition 10.7 and the results of the statistical analyses required by Permit Condition 10.8 in accordance with Table 10.9, below. The data must be reported in graphical, tabular and electronic file format, as approved by the Director.

Table 10.9

Semiannual Period		Due Date
1	January 1 – June 30	September 30
2	July 1 – December 31	March 30

10.9.3 The Permittee must submit a groundwater gradient map for the "upper" and "lower" aquifers annually (at a minimum). The map must indicate the velocity in feet/year, the groundwater elevation for each well used to generate the map, and the direction of flow. The map is due with the second semiannual report required by Permit Condition 10.9.2. The map must be submitted in electronic format.

10.9.4 If the Permittee determines, pursuant to Permit Condition 10.8.1.2, that there is a statistically significant increase (SSI) above the GWPS for any of the parameters and constituents specified in Tables 10.4A, 10.4B and 10.4C, which is not already being addressed under Permit Section 11 or

12A, the Permittee may demonstrate that a source other than a currently operating regulated unit caused the increase or that the increase resulted from error in sampling, analysis, evaluation, or natural variance in the groundwater. *[40 CFR 264.98(g)(6)]*

In such cases, the Permittee must:

10.9.4.1 Notify the Director in writing within seven (7) days of determining statistically significant evidence of contamination at the compliance point that the Permittee intends to make such a demonstration; *[40 CFR 264.98(g)(6)(i)]*

10.9.4.2 As part of the next regularly scheduled Semiannual Environmental Monitoring Report, submit a demonstration that a source other than a currently operating regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, evaluation, or natural variations in the groundwater; and *[40 CFR 264.98(g)(6)(ii)]*

10.9.4.3 Within ninety (90) days, submit to the Director an application for a permit modification to make any appropriate changes to the environmental monitoring program at the Facility; and *[40 CFR 264.98(g)(6)(iii)]*

10.9.4.4 Continue to monitor in accordance with the detection monitoring program established under this section. *[40 CFR 264.98(g)(6)(iv)]*

10.9.5 If the Permittee determines, pursuant to Permit Condition 10.8.1.2, that there is an SSI above the GWPS for any of the parameters specified in Tables 10.4A, 10.4B and 10.4C, which is not already being addressed under Permit Section 11 or 12A, and the Permittee does not submit the required demonstration under Permit Condition 10.9.4, then the Permittee must:

10.9.5.1 Notify the Director in writing within seven (7) days of the determination. *[40 CFR 264.98(g)(1)]*

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

10.9.5.3 For any Appendix IX constituents found in the analysis, pursuant to Permit Condition 10.9.5.2, the Permittee may resample at the next regularly scheduled quarterly sampling event and repeat the analysis for those compounds detected. If the results of the resample confirm the initial results, then the newly identified constituents will form the basis for the Compliance Monitoring. If the Permittee does not resample, then the constituents found pursuant to Permit Condition 10.9.5.2 will form the basis for the Compliance Monitoring. *[40 CFR 264.98(g)(3)]*

10.9.5.4 Within ninety (90) days of submitting the Semiannual Environmental[xii] Monitoring Report, submit to the Director an application for a permit modification to establish a Compliance Monitoring Program for the currently operating regulated units. *[40 CFR 264.98(g)(4)]*

The application must include the following information:

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

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

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

10.9.5.4.4 For each hazardous constituent detected at the compliance point, a proposed concentration limit under 40 CFR 264.94(a)(1) or (2), or a notice of intent to seek an alternate concentration limit under 40 CFR 264.94(b). *[40 CFR 264.98(g)(4)(iv)]*

10.10 REQUEST FOR PERMIT MODIFICATION

If the Permittee or the Director determines that the Groundwater Detection Monitoring program no longer satisfies the requirements of the regulations, the Permittee must, within ninety (90) days of the determination, submit an application for a permit modification, in accordance with Permit Condition 1.2.1, to make appropriate changes to the program which will satisfy the regulations. *[40 CFR 264.98(h)]*

10.11 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	Provide an update to the conceptual site model (CSM) for groundwater flow and determine if additional downgradient monitoring wells are required to ensure proper protection of Waters of the State. The updated CSM and groundwater monitoring well network must meet the regulations ascribed in 40 CFR 264 Subpart F and demonstrate protection of Waters of the State.	Within two (2) years of issuance of this Permit
2	Submit an updated groundwater monitoring plan and monitoring well network that meets the standards of Task 1.	One (1) year after approval of Task 1
3	Install additional wells as determined by Task 1.	One (1) year after approval of Task 2

[xii] The title of this report has been changed from the "Bi-Annual Groundwater Monitoring Report" to "Semiannual Environmental Monitoring Report" because the results from other monitoring (i.e. leachate monitoring) is included in the reports.

	Task	Date Due
4	*Reserved*	

11. SUMMARY

The Permittee is required to conduct a Groundwater Compliance Monitoring Program in accordance with 40 CFR 264.99. The Current Conditions Report (CCR) and Corrective Measures Study (CMS) described in Permit Section 12B identified closed pre-regulation landfill Trenches 1 through 9 as sources of organic vapor releases to soils beneath the site and were grounds for requiring the Permittee to maintain a Groundwater Compliance Monitoring Program. In response to the organic vapors, the Permittee is required to maintain the Soil Vapor Extraction (SVE) system, as described in Section 13 (Environmental Monitoring Plan) of the Part B Permit Application and Permit Section 12B.

As of the issuance of this Permit, there have been no Statistically Significant Increases (SSI) in the Groundwater Detection Monitoring (Permit Section 10) identified with a release from the RCRA-permitted units which would require additional compliance monitoring.

11.1 GROUNDWATER COMPLIANCE MONITORING

A description of the Facility, defining onsite, offsite and the "Point of Compliance" (POC) (see 40 CFR 264.95) is identified by the legal description of the Facility, as contained in Section 1.1.1 (Site Legal Description) and Figure 13-1 (Environmental Monitoring Systems) of Section 13, both in the Part B Permit Application.

11.2 WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee must maintain the groundwater monitoring system described in Permit Section 10, with the changes and/or additional conditions described in this section of the Permit.

11.3 GROUNDWATER PROTECTION STANDARD

11.3.1 The Permittee must monitor the groundwater to determine whether the SWMUs[i] are in compliance with the established Groundwater Protection Standard (GWPS) values listed in Table 11.3, below; to determine the effectiveness of the corrective action activities at the Facility, as required in Permit Section 12B; and to determine the extent of impacts to the groundwater.

[40 CFR 264.92 and 264.99(a)]

11.3.2 The Permittee must continue to monitor all wells listed in Table 10.3 at the point of compliance, as described in Permit Section 10, until the Director relieves the Permittee of Permit Condition 11.3. *[40 CFR 264.95 and 264.99(a)]*

11.3.2.1 If the Permittee is conducting corrective action at the end of this Permit life, then the compliance period shall be extended until the Permittee demonstrates that the GWPS has not been exceeded for at least three (3) consecutive years at all point of compliance wells or until the Permittee is relieved of the requirements of this Section. *[40 CFR 264.96(c)]*

[i] The SWMUs this Section currently applies to are the closed landfills Trenches 1 through 9.

11.3.3 The Permittee must monitor the groundwater at the background wells and Point of Compliance (POC) wells listed in Table 10.3 for the hazardous constituents listed in Table 11.3 in accordance with Permit Condition 11.3.3.1, as designated in Section 13 of the Part B Permit Application, until the Director relieves the Permittee of Permit Condition 11.3. *[40 CFR 264.99(a)]*

11.3.3.1 The Point of Compliance (POC) wells and background wells listed in Table 10.3 must be sampled at least quarterly for the parameters and constituents listed in Table 11.3. *[40 CFR 264.99(f)]*

11.3.3.2 The Permittee must annually analyze samples from the background and POC wells listed in Table 10.3 for the following constituents in Appendix IX of 40 CFR 264, which could possibly be present but are not on the detection monitoring list in the permit, during the compliance period[ii]:

1. Volatile and semi-volatile compounds;
2. Metals and inorganics;
3. Pesticides;
4. Herbicides; and
5. PCBs.

TABLE 11.3

	Monitored Groundwater Constituents[iii]	GWPS [mg/L]
1	Carbon Tetrachloride	0.005
2	Chloroform	0.005
3	Trichlorofluoromethane	0.005
4	Tetrachloroethene	0.005
5	Toluene	0.005
6	Trichloroethene	0.005
7	1,1-Dichloroethene (1,1-DCE)	TBD
8	Dichlorodifluoromethane	TBD
9	Freon-113	TBD
10	1,1,1-Trichloroethane	TBD
11	Acetone	TBD
12	Carbon Disulfide	TBD
13	Ethylbenzene	TBD

[ii] The Schedule for sampling for the Appendix IX constituents must make sure that specific wells are sampled for the Appendix IX constituents in the same quarter each year (i.e. if Well 325 is sampled for Appendix IX constituents in the 1st Quarter of 2019, then it will be sampled again in 1st Quarter of each year). This will help prevent natural seasonal changes from causing SSI's.

[iii] Indicators of Contamination or Appendix IX Constituents detected through Permit Condition 10.9.5.3 or 11.3.3.2.

Monitored Groundwater Constituents[iii]		GWPS [mg/L]
14	m & p Xylene	TBD
15	Methylene Chloride	TBD
16	4-Methyl-2-Pentanone (MIBK)	TBD
17	1,1 Dichloroethane (1,1-DCA)	TBD

11.3.4 For those constituents in Table 11.3 for which no GWPS values are established at the time this Permit is issued, the Permittee must establish GWPS values, using the background well(s), in accordance with Permit Condition 10.4.2.[iv] *[40 CFR 264.97(g)]*

11.4 SAMPLING AND ANALYSIS PROCEDURES

11.4.1 The Permittee must use the techniques and procedures described in Permit Condition 10.5 when obtaining and analyzing samples from the groundwater monitoring wells.
[40 CFR 264.97(d) and (e)]

11.5 ELEVATION OF THE GROUNDWATER SURFACE

The Permittee must determine the groundwater surface elevation at each monitoring well, as described in Permit Condition 10.6. *[40 CFR 264.97(f)]*

11.6 STATISTICAL PROCEDURES

The Permittee must use the statistical procedures described in Permit Condition 10.8.

11.7 MONITORING PROGRAM AND DATA EVALUATION

The Permittee must determine the groundwater quality as follows:

11.7.1 The Permittee must collect, preserve, and analyze groundwater samples pursuant to Permit Section 10 and the following:

11.7.1.1 The Permittee must determine if the constituents listed in Table 11.3 are detected in the POC groundwater monitoring wells listed in Table 10.3 at larger concentrations than the listed GWPS values.[v]

11.7.1.2 The Permittee must analyze samples from all monitoring wells in accord with Permit Condition 11.3, and their concentrations shall be reported to the Director in accord with Permit Condition 11.8.

[iv] Until a GWPS is established, the concentrations found for these parameters and constituents will be compared to the concentrations found in the background well during the same quarter.

[v] For constituents which do not have an established GWPS value, the Permittee must determine if the detected concentrations are larger than the concentrations found in the Background Well(s) for the same quarter.

11.8 RECORDKEEPING AND REPORTING

11.8.1 The Permittee must enter all monitoring, testing and analytical data obtained pursuant to Permit Condition 11.3 in the operating record. The data must include all computations, calculated means, variances and results of statistical tests. *[40 CFR 264.73(b)]*

11.8.2 The Permittee must report the results of all sampling and analysis conducted pursuant to Permit Conditions 11.3 through 11.7 in the reports required by Permit Condition 10.9.2.

11.9 SPECIAL REQUIREMENTS IF THE GWPS IS EXCEEDED

If the GWPS has been exceeded at any monitoring well at the point of compliance, and the constituent and specific monitoring well exceeding the GWPS are not already being addressed by Permit Section 12A, the Permittee must:

11.9.1 Notify the Director of this finding in writing within seven (7) days of the determination. The notification must indicate what concentration limits have been exceeded. *[40 CFR 264.99(h)(1)]*

11.9.2 The Permittee may demonstrate that the exceedance was due to source(s) other than a regulated unit or that the exceedance resulted from errors in sampling, analysis or evaluation, as described in Permit Condition 10.9.4. *[40 CFR 264.99(i)]*

In such cases, the Permittee must:

11.9.2.1 Notify the Director in writing within seven (7) days of determining the GWPS exceedance that the Permittee intends to make such a demonstration; *[40 CFR 264.99(i)(1)]*

11.9.2.2 Within ninety (90) days, submit a report to the Director which demonstrates that a source other than a regulated unit caused the GWPS to be exceeded or that the exceedance resulted from error in sampling, analysis or evaluation; *[40 CFR 264.99(i)(2)]*

11.9.2.3 Within ninety (90) days, submit to the Director an application for a permit modification to make any appropriate changes to the compliance monitoring program at the Facility; and *[40 CFR 264.99(i)(3)]*

11.9.2.4 Continue to monitor in accordance with the compliance monitoring program established under this section. *[40 CFR 264.99(i)(4)]*

11.9.3 If the Permittee does not submit the required documentation under Permit Condition 11.9.2, then the Permittee shall submit to the Director, within 180 days, an application for a permit modification to establish a corrective action program meeting the requirements of 40 CFR 264.100. *[40 CFR 264.99(h)(2)]*

The application must include the following information:

11.9.3.1 A detailed description of corrective actions that will achieve compliance with the GWPS specified in Permit Condition 11.3. *[40 CFR 264.99(h)(2)(i)]*

11.9.3.2 A plan for a groundwater monitoring program that will demonstrate the effectiveness of the corrective action. Such a groundwater monitoring program will be based on a compliance monitoring program developed to meet the requirements of this permit section.

11.10 REQUEST FOR PERMIT MODIFICATION

If the Permittee or the Director determines that the Groundwater Compliance Monitoring program no longer satisfies the regulatory requirements of 40 CFR 264.99, then the Permittee must submit an application for a permit modification, in accordance with Permit Condition 1.2.1, within ninety (90) days of the determination to make appropriate changes to the program which will satisfy the regulations. *[40 CFR 264.99(j)]*

11.11 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	*Reserved*	

12A. SUMMARY

This section of the Permit applies to the hazardous waste "regulated units"[i] at the Facility. Specifically, this section applies to Trench 11, Trench 12 and Trench 13. The corrective action for units which operated prior to the implementation of RCRA regulations is covered in Permit Section 12B. The Groundwater Detection Monitoring Program set forth in Permit Section 10 is used to determine if a release from the regulated unit(s) has occurred. If determined that a release has occurred from a regulated unit, the Permittee is required to prepare and implement a Corrective Action Program that satisfies the requirements of 40 CFR 264.100. As of the issuance of this Permit, there has been no identification of corrective action required at Trench 11, Trench 12 or Trench 13.

Documents submitted in support of a Corrective Action Program required under this part shall be adopted by reference as if fully set forth herein.

12A.1 GROUNDWATER WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee must continue to maintain the groundwater monitoring system described in Permit Section 10, as required by 40 CFR 264.100(d), with the changes and/or additional conditions described in Section 11 and this section of the Permit.

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

TABLE 12A.1

	Monitoring Well Identification	Location
1	*Reserved*	*Reserved*
2		

12A.1.2 The Permittee must construct and maintain the monitoring wells identified in Table 12A.1 in accordance with the plans and specifications meeting the requirements of 40 CFR 264.97(c). The plans and specifications shall consist of design drawings and design criteria applicable to all wells, as well as individual well specifications identifying total well depth and location of screened intervals. *[40 CFR 264.100(d)]*

12A.1.3 All wells deleted from the monitoring program shall be plugged and abandoned in accordance with Permit Condition 10.3.4. Well plugging and abandonment methods and certification shall be submitted to the Director within sixty (60) days from the date the wells are removed from the monitoring program.

[i] A "regulated unit" is defined in 40 CFR 264.90(a)(2) as "a surface impoundment, waste pile, and land treatment unit or landfill that receives hazardous waste after July 26, 1982". Accordingly, Trench 10 meets the definition of a regulated unit. As this unit is also a SWMU, the Division has opted to address any releases and associated corrective action(s) for Trench 10 as a SWMU in accordance with Section 12B of this Permit.

12A.2 GROUNDWATER PROTECTION STANDARD

12A.2.1 The Permittee must implement a corrective action program to demonstrate the effectiveness of the corrective measures being taken and determine whether regulated units are in compliance with the established Groundwater Protection Standard (GWPS) values listed in Tables 10.4A, 10.4B, 10.4C and 11.3. *[40 CFR 264.100(d)]*

12A.2.2 The Permittee must continue to monitor all wells listed in Table 10.3, as described in Permit Section 10, during the compliance period[ii] or until the Director relieves the Permittee of Permit Condition 12A.2. *[40 CFR 264.95 and 264.100(d)]*

12A.2.3 The Permittee must continue to monitor the groundwater at the background and Point of Compliance (POC) wells listed in Table 10.3 for the hazardous constituents listed in Table 11.3, during the compliance period. *[40 CFR 264.100(d)]*

12A.2.4 The Permittee must monitor the wells identified in Table 12A.1 and any wells located between those wells and the Facility boundary for the hazardous constituents listed in Table 12A.2 during the compliance period. *[40 CFR 264.93, 264.95 and 264.100(d)]*

TABLE 12A.2 – Treatment Effectiveness

	Parameter or Constituent	GWPS [mg/L]
1	*Reserved*	*Reserved*
2		

12A.3 CORRECTIVE ACTION PROGRAM

12A.3.1 The Permittee must submit the following documents within 180 days of a confirmed exceedance of the GWPS of Permit Sections 10 and 11, in a manner consistent with establishing a timely Corrective Action Program:

1. A Corrective Measures Study (CMS), as described in Permit Condition 12B.5.3; and
2. Any other documents, as required by the Division.

12A.3.2 The Permittee must begin corrective action within a period specified by the Director from the time the GWPS was exceeded. *[40 CFR 264.100(c)]*

12A.3.3 The Permittee must implement a corrective action program that prevents hazardous constituents from exceeding their respective concentration limits (as required under Permit Condition 12A.3.1) at the compliance point by removing the hazardous waste constituents or by treating them in place. *[40 CFR 264.100(b)]*

[ii] The Compliance Period begins when the Permittee initiates a compliance monitoring program and continues for the active life of the Facility.

12A.3.4 In conjunction with the corrective action program, the Permittee must continue the Groundwater Compliance Monitoring Program described in Permit Section 11. This monitoring program must determine both compliance with the GWPS and the success of the corrective action program required under Permit Condition 12A.3.5. *[40 CFR 264.100(d)]*

12A.3.5 The Permittee must conduct a corrective action program to remove or treat in-place any hazardous constituents that exceed GWPS limits in groundwater between the compliance point and the downgradient Facility property boundary and beyond the Facility boundary[iii], where necessary to protect human health and the environment, in accordance with corrective action procedures approved by the Director. *[40 CFR 264.100(e)]*

12A.3.6 If the GWPS is met during the compliance period, the Permittee must continue corrective action to the extent necessary to ensure that the GWPS is not exceeded. If corrective action is required beyond the compliance period, it must continue until the GWPS has not been exceeded for three (3) consecutive years. *[40 CFR 264.100(f)]*

12A.4 SAMPLING AND ANALYSIS PROCEDURES

12A.4.1 The Permittee must use the techniques and procedures described in Permit Conditions 10.4 and 10.5 when obtaining and analyzing samples from the groundwater monitoring wells described in Permit Condition 12A.1. *[40 CFR 264.97(d) and (e)]*

12A.4.2 The Permittee must continue to monitor all wells in Table 10.2 as described in Section 10. *[40 CFR 264.99(f)]*

12A.4.3 The wells identified in Table 12A.1 and any wells located between those wells in Table 12A.1 and the Facility boundary must be sampled at least quarterly for the parameters and constituents listed in Table 12A.2.

12A.4.4 The Permittee must annually analyze samples from the background well(s) and wells determined to be within or downgradient from the Area of Concern, for constituents listed in Appendix IX of 40 CFR 264 which could possibly be present but are not already being monitored for. This shall continue during the compliance period. *[40 CFR 264.99(g)]*

12A.5 ELEVATION OF THE GROUNDWATER SURFACE

The Permittee must determine the groundwater surface elevation at each monitoring well, as described in Permit Condition 10.6. *[40 CFR 264.97(f)]*

12A.6 STATISTICAL PROCEDURES

12A.6.1 When evaluating the monitoring results to determine the performance of corrective action

[iii] The Permittee may demonstrate that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake corrective action beyond the Facility boundary. These will be handled on a case-by-case basis as described in 40 CFR 264.100(e)(2).

measures, in accordance with Permit Condition 12A.7, the Permittee must use the statistical procedures described in Permit Condition 10.8 or other procedures approved by the Director.

12A.7 MONITORING PROGRAM AND DATA EVALUATION

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

12A.7.1 The Permittee must collect, preserve and analyze samples in accordance with Permit Sections 10, 11 and the following:

12A.7.2 The Permittee must determine the concentrations of the hazardous parameters and constituents specified in Permit Condition 12A.2, throughout the compliance period and any extensions due to corrective action implementation, to demonstrate conformance with the GWPS.
[40 CFR 264.96]

12A.7.3 The Permittee must determine the concentration of hazardous parameters and constituents in the groundwater at each monitoring well in accord with Permit Condition 12A.4, and their concentrations shall be reported to the Director in accord with Permit Condition 12A.8.
[40 CFR 264.100(d)]

12A.7.4 The Permittee must analyze samples from all POC monitoring wells for all constituents contained in 40 CFR 264, Appendix IX at least once every year to determine if additional hazardous constituents are present in the uppermost aquifer. If the Permittee finds additional hazardous constituents present (i.e. not already listed in Permit Sections 10, 11 or 12), their concentrations must be reported to the Director in writing within seven (7) days from completion of the analysis.

12A.7.5 The Permittee must determine the groundwater flow rate and direction in the uppermost aquifer at least annually. *[40 CFR 264.99(e)]*

12A.7.6 The Permittee must statistically compare the measured concentration of each monitored hazardous constituent with its concentration limit specified in the GWPS each time groundwater quality is determined, in accordance with Permit Condition 12A.7.2. The Permittee must compare the groundwater quality measured at each POC monitoring well and any other specified wells, as stated in Permit Condition 12A.2 and in accordance with the procedures specified in Permit Condition 12A.6.

12A.8 RECORDKEEPING AND REPORTING

12A.8.1 The Permittee must enter all monitoring, testing and analytical data obtained pursuant to Permit Condition 12A.7, in the operating record. The data must include all computations, calculated means, variances, and results of the statistical test(s) that the Director has specified.
[40 CFR 264.73(b)(6)]

12A.8.2 The Permittee must submit semiannual reports to the Director describing the effectiveness of the corrective action program. The report must include graphical representations of the constituents in Table 12A.2. These reports must be submitted with the Semiannual Reports (see Permit Condition 10.9) and include the analytical results. These reports must be submitted until the corrective action program has been completed. *[40 CFR 264.100(g)]*

12A.9 REQUEST FOR PERMIT MODIFICATION

If the Permittee or the Director determines that the corrective action program no longer satisfies the regulatory requirements of this Section of the Permit, then the Permittee must submit, within ninety (90) days of the determination, an application for a permit modification to make appropriate changes to the program. *[40 CFR 264.100(h)]*

12A.10 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	*Reserved*	

12B SUMMARY AND APPLICABILITY

The objective of the corrective action program at a permitted hazardous waste management facility is to evaluate the nature and extent of releases of hazardous waste and/or constituents and, if necessary, implement corrective measures to clean-up the releases and protect human health and the environment. The Permittee is required to implement corrective action in accordance with 40 CFR 264.100, 264.101 and the conditions of this Permit. The Permittee shall follow applicable guidance, including but not limited to, the RCRA Corrective Action Plan, EPA 520-R-94-004, dated May 1994 (or most recent version).

The Permittee shall conduct the following Corrective Actions for release(s) from Solid Waste Management Units (SWMUs), including the formerly used disposal areas (Trench 1 through Trench 10).

12B.1 AUTHORITY

RCRA Section 3004(u) and 40 CFR 264.101, as adopted in NAC 444.8632, require that the Permittee must institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste or hazardous constituents from any Solid Waste Management Unit (SWMU) at the Facility, regardless of when the waste was placed in the unit or whether the unit is closed. These regulations also require that hazardous waste permits contain schedules of compliance for corrective action, where such corrective action cannot be completed prior to issuance of the permit. NAC 445A.121 sets the standards applicable to all waters of the state and will be used to evaluate the impacts of any releases. NRS 445A.575 and 445A.465 are the statutes which define the authority of the Division to regulate the discharge of hazardous constituents to the waters of the state. Section 301(c) of the Federal Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) defines the area under the Facility to be natural resources managed or controlled by the State of Nevada.

12B.2 SUMMARY AND HISTORY OF CORRECTIVE ACTION

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

1. *Evaluate all data collected, to date, and develop a site conceptual model* – Data was used to prepare the Current Conditions Report (September 30, 1998) and Corrective Measures

Study Report (April 4, 2003).

2. *Develop a new RFI Workplan, if necessary, to determine fully the nature and extent of any release of hazardous waste and/or hazardous constituents at or from the Facility* – The RFI Workplan submitted on November 20, 1998 was accepted and a new workplan was not required.
3. *Determine the impact to human health and the environment due to the release of hazardous constituents at the Facility* – The Current Conditions Report submitted on September 30, 1998 and the Corrective Measures Study Report submitted on April 4, 2003 addressed this.
4. *Perform a Corrective Measure Study (CMS) to identify and evaluate alternatives for the corrective action necessary to prevent, mitigate and/or remediate any releases of hazardous wastes or hazardous constituents at or from the Facility* – The CMS was conducted and the resulting report was submitted on April 4, 2003.
5. *Implement the corrective measure(s), if required by the NDEP, at the Facility* – The Phase I SVE Well was installed in March 1999, has been maintained and continues to operate.
6. *Perform any other activities necessary to correct actual or potential threats to human health and/or the environment resulting from the release or potential release of hazardous waste or hazardous constituents at the Facility* – No specific activities have been identified or implemented.

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

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

12B.2.2 Previously submitted documents in support of the Corrective Action activities at the Facility include:

1. Current Conditions Report (CCR) – September 1998
2. RCRA Facility Investigation (RFI) Workplan – November 1998
3. RCRA Facility Investigation (RFI) Report – December 1998
4. Corrective Measures Study (CMS) Workplan – February 1999
5. Evaluation of Groundwater and Vadose zone Monitoring Network – November 2000

6. Recommendations for SVE Well Placement as a part of Corrective Measures Study (CMS) Report – December 2002
7. Corrective Measures Study (CMS) Report – April 2003
8. Well Abandonment and Installation Report – August 2003
9. Soil Vapor Extraction (SVE) Well Installation and Corrective Measures Implementation (CMI) Project – May 2004
10. Corrective Measures Implementation (CMI) Plan – October 2005
11. Soil Vapor Extraction (SVE) System Performance Letter – June 2016
12. Corrective Measures Study (CMS) Evaluation Report – June 2018
13. Soil Vapor Extraction (SVE) Design Test Workplan – November 2018
14. Soil Vapor Extraction (SVE) Test Reports – January 2020

12B.3 CORRECTIVE ACTION FOR SWMUs AND AOCs

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

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

12B.3.1 SWMUs and AOCs Identified by the RFA and Other Means

The initial RCRA Facility Assessment (RFA) [April 1987], subsequent investigations, and other means have identified the SWMUs and areas of concern (AOCs) at the Facility. The current SWMUs and AOCs are listed in Tables 12B.3A through 12B.3G, below.[i]

Table 12B.3A – SWMUs/AOCs Regulated under 40 CFR 264 (RCRA-HWMUs)

SWMU/AOC No.	SWMU/AOC Name
1-9	Trench 1 through Trench 9
11	CMU 1 – PCB/RCRA Processing and DEA Storage Building
12	CMU 6 – Dry Hazardous Waste Storage Area 2 (DHWSA #2)
13	CMU 7 – Bin Storage Pad
14	CMU 16 – Container & Tank Management Building (CTMB)
15	CMU 17 – Dry Hazardous Waste Storage Area 3 (DHWSA #3)
16	Tank 4 through Tank 7 – PCB Storage[ii]
18	Treatment Tanks 2 & 3[iii]
19	Treatment Tanks 18 & 19
20	Evaporation Tank – Truck Wash Pad (Tank 11)
21	Tank 20 (Main Laboratory)
22	Tank 21 (Satellite Laboratory 1)

[i] Tables 12B.3A through 12B.3F show the status of the SWMUs and AOCs at the time this permit was issued.
[ii] Tank 8 was closed and removed.
[iii] Treatment Tank 1 was closed and removed in 2017.

SWMU/AOC No.	SWMU/AOC Name
23	CMU 19 – Container Management and Storage Building 2 (CMS 2)
24	CMU 20 (Satellite Laboratory 2)
25	Treatment Tanks 22, 23 & 24 [iv]
26	Tank 25 (Satellite Laboratory 2) [iv]
27	Treatment Tanks 26 & 27 [iv]
28	Tanks 28 & 29 [iv]
29	CMU 21 – Dry Hazardous Waste Storage Aare 4 (DHWSA #4)
RCRA 1	Trench 10
RCRA 2	Trench 11
RCRA 3	Trench 12
RCRA 4	Trench 13
Reserved	*Reserved*

Table 12B.3B – SWMUs and AOCs Requiring No Further Action at this Time

SWMU/AOC No.	SWMU/AOC Name
NFA 1	The "Terminator"
NFA 2	WCSA 1
NFA 3	WCSA 2
NFA 4	DHWSA 1
10	Low Temperature Thermal Desorption (LTTD) System – CLOSED
17	Tank 15 – Leachate Storage - CLOSED
Reserved	*Reserved*

Table 12B.3C – SWMUs and AOCs Requiring a RCRA Facility Investigation (RFI)

SWMU/AOC No.	SWMU/AOC Name
Reserved	*Reserved*

Table 12B.3D – SWMUs and AOCs Requiring a Corrective Measures Study

SWMU/AOC No.	SWMU/AOC Name
Reserved	*Reserved*

Table 12B.3E – SWMUs and AOCs Requiring a Corrective Measures Implementation Plan

SWMU/AOC No.	SWMU/AOC Name
1-9	Trench 1 through Trench 9
RCRA 1	Trench 10
Reserved	*Reserved*

[iv] Tanks 22 thru 29 were proposed tanks when this permit was issued.

Table 12B.3F – SWMUs and AOCs in Corrective Action

SWMU/AOC No.	SWMU/AOC Name
1-9	Trench 1 through Trench 9
RCRA 1	Trench 10
Reserved	*Reserved*

Table 12B.3G – SWMUs and AOCs Requiring Land Use Controls

SWMU/AOC No.	SWMU/AOC Name
1-9	Trench 1 through Trench 9
RCRA 1	Trench 10
RCRA 2	Trench 11
RCRA 3	Trench 12
RCRA 4	Trench 13
Reserved	*Reserved*

12B.3.2 Additional SWMUs or AOCs

Additional SWMUs or AOCs may be discovered during the course of groundwater monitoring, soil monitoring, field investigations, environmental audits, releases or other means.

12B.3.3 Contamination Beyond Facility Boundary

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

[40 CFR 264.110(c)]

12B.4 NOTIFICATION AND ASSESSMENT REQUIREMENTS FOR NEWLY IDENTIFIED SWMUS AND AOCS

12B.4.1 Notification

The Permittee must notify the Director orally within twenty-four (24) hours of discovery and in writing, within fifteen (15) calendar days of discovery, of any additional SWMUs, AOCs and/or releases of hazardous waste discovered under Permit Condition 12B3.2. The notification shall include, at a minimum:

1. A unique sequential identification number for the SWMU or AOC;
2. The location of the SWMU or AOC; and
3. All available information pertaining to the nature of the release (e.g., media affected, hazardous constituents released, magnitude of release, etc.).

12B.4.2 Assessment Report (AR)

The Permittee must prepare and submit to the Director, within ninety (90) calendar days of notification, an Assessment Report (AR) for each SWMU, AOC, or release identified under Permit Condition 12B3.2. At a minimum, the AR must provide the following information:

1. The unique sequential identification number for the SWMU, AOC or release;
2. Location of the unit(s)/area(s) on a topographic map of appropriate scale, such as required under 40 CFR 270.14(b)(19);
3. Designation of type and function of unit(s) and/or use of area(s);
4. General dimensions, capacities and structural description of unit(s)/area(s) (supply any available plans/drawings);
5. Dates the unit(s)/area(s) was operated/used;
6. Specification of all wastes that have been managed at/in the unit(s)/area(s), to the extent available. Include any available data on 40 CFR Part 261 Appendix VIII or 40 CFR Part 264 Appendix IX constituents contained in the wastes; and
7. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s)/area(s) (including groundwater, soil, air, surface water, and/or sediment data).

12B.4.3 Director's Determination

The Director shall determine the need for further investigations at the SWMU(s), AOC(s), or release site(s) covered in the AR. If the Director determines that such investigations are needed, the Permittee must prepare a plan for such investigations. If the Director determines further investigation of the SWMU(s), AOC(s) or release site(s) is required, the Permittee must submit an application for a Permit Modification, in accordance with 40 CFR 270 Subpart D.

12B.5 WORK TO BE PERFORMED

In the event of a release of a hazardous waste or constituent, or a requirement for conducting corrective action by way of the Division, the Permittee must complete the following:

12B.5.1 RCRA Facility Assessment (RFA)

The Permittee must complete a RCRA Facility Assessment (RFA) identifying the type of hazardous waste or constituents released, the location of the release, and any potential pathways. The Permittee must submit this information to the Division in a written report.

12B.5.2 RCRA Facility Investigation (RFI)

The Permittee must complete a RCRA Facility Investigation (RFI) characterizing the nature and extent of the release identified in the RFA. This information must be submitted to the Division in a written report.

12B.5.3 Corrective Measures Study (CMS)

If the Division determines that a corrective action is necessary, the Permittee must conduct a Corrective Measures Study (CMS) to determine the most effective cleanup alternative. The purpose of the CMS is to identify and recommend specific corrective measures that will

adequately correct the release. Remedy selection is the determination of which cleanup action will be implemented to correct the release and the time frames in which it must be implemented. The Permittee must submit this information to the Division in a written report.

12B.5.4 Corrective Measures Implementation (CMI)

After the Division evaluates the corrective measure alternatives presented in the approved CMS Report, the Division will propose or accept a corrective measure (or measures) for implementation at the Facility. The Permittee must submit a certified report documenting that the corrective measures have been completed in accordance with the approved remedy.

[40 CFR 264.100(c)]

12B.6 DESCRIPTIONS OF SWMUS AND AOCS

The intended action and status for the following SWMUs and AOCs can be found in Tables 12B.3A through 12B.3G.

12B.6.1 Trenches 1 through 9 (1 – 9)

Trenches 1 through 9 are inactive Pre-RCRA chemical disposal trenches located to the east of Trench 11 and underneath CMUs #1 and 6. These trenches accepted waste for disposal from 1971 to 1982. A RCRA Facility Investigation (RFI) Report (1998) identified Trenches 1-9 as probable causes of groundwater and soil gas contamination. The Soil Vapor Extraction (SVE) system is being used as corrective measures to reduce this contamination.

12B.6.2 Trench 10 (RCRA 1)

Trench 10 is an inactive chemical and PCB disposal trench located to the east of Trench 11 and underneath CMU #17. This trench accepted waste for disposal from 1980 to ~1991. It was certified as being closed in 1997. Like Trenches 1 – 9, a 1998 RFI Report identified Trench 10 as a probable cause of groundwater and soil gas contamination. The Soil Vapor Extraction (SVE) system is being used as corrective measures to reduce this contamination.

12B.6.3 Trench 11 (RCRA 2)

Trench 11 is an inactive RCRA hazardous waste and PCB disposal trench located between the inactive Trench 12 and the closed Trench 10. This trench accepted waste for disposal from 1983 to 2013. Post-closure leachate and lysimeter monitoring is continuing as part of the Facility's environmental monitoring plan.

12B.6.4 Trench 12 (RCRA 3)

Trench 12 is an inactive RCRA hazardous waste and PCB disposal trench located to the west of inactive Trench 11. This trench accepted waste for disposal from 2008 to 2020. Post-closure leachate monitoring is continuing as part of the Facility's environmental monitoring plan.

12B.6.5 The "Terminator" (NFA 1)

The "Terminator" was a flow through stabilization treatment system which treated bulk hazardous waste to immobilize the hazardous constituents and meet the Land Disposal Restriction (LDR) of 40 CFR 268. The unit was located in an area to the southeast of the current PCB/RCRA Container Storage Area and was permitted as a miscellaneous Subpart X unit which operated from 1993 to 1999. The "Terminator" is closed, and no further action is required.

12B.6.6 WCSA 1 (NFA 2)

WCSA 1, also known as CMU 3, was a Waste Consolidation and Storage Area located in about the same location as the current CMU 16 container storage area. This unit, which operated from 1954 to 2007, is closed and no further action is required.

12B.6.7 WCSA 2 (NFA 3)

WCSA 2, also known as CMU-4, was a Waste Consolidation and Storage Area located just east of the current CMU 7 container storage area. This unit, which operated from 1954 to 2007, is closed and no further action is required.

12B.6.8 DHWSA 1 (NFA 4)

DHWSA 1, also known as CMU-5, was a Dry Hazardous Waste Storage Area located in the current Trench 12 area. This unit, which operated from 1987 to 2010, is closed and no further action is required.

12B.6.9 Low Temperature Thermal Desorption (LTTD) System (10)

The Low Temperature Thermal Desorption (LTTD) System was a distillation system used for the treatment of waste impacted by hazardous substances, petroleum products, volatile and semi-volatile compounds, chlorinated solvents, pesticides and other RCRA hazardous wastes. This unit was located where the "Terminator" had been, operated from 2001 to 2012, and is closed with no further action required.

12B.6.10 Tank 15 – Leachate Storage (17)

Tank 15 was a storage tank located on the north side of the Stabilization building. This tank was permitted to store leachate for up to ninety (90) days, prior to treatment and/or disposal. Tank 15 was used from 1997 to 2014. After closure, Tank 15 and its containment were removed and disposed of in Trench 12. No further action is required.

12B.7 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **continue the maintenance and monitoring** of the SVE Well.	Continue until Further Notice

	Task	Date Due
2	The Permittee shall **schedule** a meeting with NDEP to **review** the current status of corrective action measures at the Beatty facility and to outline objectives for a new corrective action Workplan.	Within 30 days of Permit effective date
3	The Permittee shall **submit** to the Division for **review and approval** a corrective action Workplan to fully delineate and characterize the existing organic vapor contaminant plume(s).	90 days after Meeting from SOC 1
4	The Permittee shall **implement** the Workplan and **submit** to the Division for **review and approval** a Report with resulting data.	TBD
5	The Permittee shall **utilize** the new data to **develop and provide** to the Division for **review and approval** a Control Plan for containing and monitoring the existing contaminant plume(s) and for detecting changes in the concentrations of VOC contaminants within the vadose zone. The plan should include upgrades of the existing SVE system.	TBD
6	The Permittee shall, upon approval by NDEP, **implement** the new Control Plan and **continue to monitor and report** performance results.	TBD
7	*Reserved*	

13. SUMMARY

This section of the Permit pertains to the post-closure care required for the RCRA hazardous waste landfills. Currently, this applies to the closed Trench 10, Trench 11 and Trench 12 and will apply to the currently operating Trench 13 when it is closed. The post-closure care for Trench 13 must begin after completion of closure of the unit, shall continue for thirty (30) years after that date, and shall include monitoring, reporting and maintenance. *[40 CFR 264.117, 264.310]*

13.1 POST-CLOSURE CARE

The units which require post-closure care are listed in Table 13.2, below. The post-closure plans and procedures are described in this Permit Section and Section 17 (Post-Closure Care Plan) of the Part B Permit Application.

13.2 UNIT IDENTIFICATION

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

Table 13.2

Type of Waste Unit		Unit Description	Total Maximum Capacity [yd^3]	Waste Description	Date of Certification of Closure
1	Landfill	Trench 10	~824,638	Various	8/8/1997
2	Landfill	Trench 11	~$2.36*10^6$	RCRA and TSCA	2/27/2014
3	Landfill	Trench 12	~$1.66*10^6$	RCRA and TSCA	12/17/2021
4	Landfill	Trench 13	~$8.6*10^6$	RCRA and TSCA	*N/A*
5	*Landfill*	*Reserved*		*Reserved*	

13.3 POST-CLOSURE PROCEDURES AND USE OF PROPERTY

13.3.1 The Permittee must maintain a written Post-Closure Care Plan as described in Permit Condition 2.15.

13.3.2 The Permittee must conduct post-closure care for each hazardous waste management unit listed in Table 13.2, above, to begin after completion of closure of the unit and continue for thirty (30) years after closure of the last unit listed above. The 30-year post-closure care period may be shortened upon application and demonstration approved by the Director that the Facility is secure, or may be extended if the Director finds this is necessary to protect human health and the environment. Post-closure care shall be in accordance with 40 CFR 264.117-120, this Permit, and the Post-Closure Care Plan contained in Section 17 of the approved RCRA Part B Permit Application. *[40 CFR 264.117(a)]*

13.3.3 The Permittee must maintain the groundwater monitoring system as required by Permit Sections 10, 11 and 12A and comply with all other applicable requirements of 40 CFR 264 Subpart F during the post-closure period. *[40 CFR 264.117(a)(1)]*

13.3.4 The Permittee must comply with the requirements of 40 CFR 264.310(b) for landfills as follows:

13.3.4.1 The Permittee must comply with the post-closure requirements of Section 17 of the Part B Permit Application;

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

13.3.4.3 Continue to operate the leachate collection and removal system until leachate is no longer present;

13.3.4.4 Maintain and monitor the leak detection system in accord with 40 CFR 264.301(c)(3)(iv) and (4) and 264.303(c), and comply with all other applicable leak detection system requirements;

13.3.4.5 Maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of 40 CFR 264 Subpart F;

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

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

13.3.5 The Permittee must control wind dispersal of hazardous waste as required under 40 CFR 264.301(j).

13.3.6 The Permittee must annually survey the elevation of the closure caps to verify the cap is not eroding or otherwise compromised and submit the results to the Director. The results must be submitted with the annual report described in Permit Condition 2.13.4.

13.3.7 The Permittee must annually obtain and review the current FEMA 100-year flood plain map to determine if any portion of any of the landfills is located within a 100-year flood plain and submit the results to the Director[i]. The results must be submitted with the annual report described in Permit Condition 2.13.4.

13.3.7.1 If the Permittee determines that a portion of one or more of the landfills is located within a 100-year flood plain, then the Permittee shall redesign the existing run-on control system to be able to handle such floods. The new design shall be submitted as a permit modification, including a schedule for the construction and/or implementation of the new run-on control system. The permit modification must be submitted within thirty (30) days of the determination.

13.3.8 The Permittee must comply with all security requirements, preventing access to closed units, as specified in Sections 3 and 17 of the Part B Permit Application. *[40 CFR 264.117(b)]*

[i] At the time this Permit was issued, a 100-year floodplain was located adjacent to the facility.

13.3.9 The Permittee must not allow any use of the units designated in Permit Condition 13.2 which will disturb the integrity of the final cover, liners, any components of the containment system, or the function of the Facility's monitoring systems during the post-closure care period.

[40 CFR 264.117(c)]

13.3.10 If the Director makes a determination that post-closure activities are to be performed for a unit, a detailed post-closure plan shall be prepared and submitted to the Director within ninety (90) days of the effective date of such determination. All post-closure care activities must be conducted in accordance with the provisions of the Director-approved detailed Post-Closure Care Plan.

[40 CFR 264.117(d) and 264.118(b)]

13.4 INSPECTIONS

13.4.1 The Permittee must inspect the components, structures and equipment at the site (e.g. fences, gates, signs) in accordance with Section 17 of the Part B Permit Application.

[40 CFR 264.117(a)(1)(ii), 264.310(b)]

13.4.2 The Permittee must inspect the cover system(s) of each landfill for uniformity, drainage, and imperfections bi-annually for a minimum of thirty (30) years after closure of the landfill. Soil based covers must be inspected for imperfections including cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the cover.

13.4.3 The Permittee must monitor moisture migration through the final cover system of Trench 11 using a lysimeter system in accordance with Section 17 of the Part B Permit Application for a period of at least ten (10) years[ii] following initial installation of the lysimeter. Data from this monitoring will be used by the Director to assess the need for similar monitoring and/or design adjustments in the final covers of Trench 12 and Trench 13 after each trench closes.

13.5 NOTICES AND CERTIFICATION

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

[ii] The initial period ended at the end of 2023. See SOC Task #1 in Permit Condition 13.9.

13.5.2 Within sixty (60) days of Certification of Closure of the first and last hazardous waste disposal units, the Permittee must: *[40 CFR 264.119(b)]*

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

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

13.5.2.2 Submit a certification to the Director, signed by the Permittee, that he has recorded the notation specified in Permit Condition 13.5.2.1, including a copy of the document in which the notation has been placed.

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

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

13.6 COST ESTIMATE FOR FACILITY POST-CLOSURE CARE

13.6.1 The Permittee must adjust the post-closure cost estimate for inflation no later than sixty (60) days prior to the anniversary date of October 15th. *[40 CFR 264.144(b)]*

13.6.2 The Permittee must revise the post-closure cost estimate whenever there is a change in the Facility's Post-Closure Care Plan, as required by 40 CFR 264.144(c) and 270 Subpart D.

13.6.3 The Permittee must keep at the Facility the latest post-closure cost estimate.
[40 CFR 264.144(d)]

13.7 FINANCIAL ASSURANCE FOR FACILITY POST-CLOSURE CARE

13.7.1 The Permittee must maintain financial assurance during the post-closure period, in compliance with Permit Section 14 and Section 18 of the Part B Permit Application. *[40 CFR 264.145]*

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

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

13.7.4 In the event of a change in the post-closure cost estimate (see Permit Condition 13.6.2), the Permittee must submit the change to the Director within sixty (60) days after the effective date of the change. Any required adjustments to the amount of financial assurance required must be made after the post-closure cost estimate is revised.

13.8 POST-CLOSURE PERMIT MODIFICATIONS

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

13.9 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	The Permittee shall **schedule a meeting** with the NDEP-BSMM HW Permitting staff to review the Alternate Final Cover Performance findings found through the Trench 11 Lysimeter and determine if the Alternate Final Cover design used for Trench 11 and Trench 12 fulfills the requirements of 40 CFR 264.310 and demonstrates compliance with Permit Condition 13.3.3 of RCRA Permit NEVHW0025 (Rev 8, Sept 2023).	Within thirty (30) days of issuance of this Permit

	Task	Date Due
2	The Permittee shall **develop and provide** a Post-Closure Plan for Trench 10, including the cleanup of any leaking and/or spilled containers stored on top of Trench 10 and a copy of the Survey Plat for Trench 10. **Provide** an updated Post-Closure Cost Estimate to include the post-closure maintenance of Trench 10.	Within ninety (90) days of issuance of this Permit
3	Post-Closure of Trench 11 – The Permittee shall **continue the post-closure care** of Trench 11 described in Permit Conditions 13.3 and 13.4, and the Post-Closure Care Plan in Section 17 of the Part B Permit Renewal Application.	Continue until at least February 27, 2044
4	Post-Closure of Trench 12 – The Permittee shall **continue the post-closure care** of Trench 12 described in Permit Conditions 13.3 and 13.4, and the Post-Closure Care Plan in Section 17 of the Part B Permit Application, including the establishment of benchmarks and measuring them annually (see Permit Condition 13.3.6).	Continue until at least December 17, 2051
5	Run-on and run-off controls for closed landfills – The Permittee shall **review and update** the run-on and run-off controls for the closed landfill units to meet the design criteria for managing the largest storm event experienced.	Within one (1) year of issuance of this Permit
6	*Reserved*	

14. SUMMARY

The Permittee must comply with the Financial Assurance requirements of this Permit Section and establish and/or maintain a funding mechanism(s) to fully cover the Closure Costs, Post-Closure Costs and any required Corrective Action measures, including Sudden/Non-Sudden Liability for any accidental release from the Facility. The Facility is proposed to be closed with post-closure monitoring and care. As such, the required financial assurance must include a funding mechanism for the post-closure care and monitoring of the Facility, in accordance with the Closure and Post-Closure Care Plans and State requirements.

14.1 APPLICABILITY

The property site is owned by the State of Nevada and is operated by US Ecology Nevada, Inc. as the Permittee, under an Operating Agreement with the State of Nevada. As such, the Facility is exempt from complying with the 40 CFR 264 Subpart H requirements, except as provided otherwise in this Permit and the Agreement. Therefore, the Director has imposed alternative requirements for financial assurance set out in this Permit or in an enforceable document (as defined in 40 CFR 270.1(c)(7)), where the Director:

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

14.2 FINANCIAL ASSURANCE FOR FACILITY CLOSURE, POST-CLOSURE, SUDDEN/NON-SUDDEN LIABILITY AND CORRECTIVE ACTION

The Permittee must demonstrate continuous compliance with 40 CFR 264.142, 264.143, 264.144, 264.145, 264.146 and 264.147 by following the Financial Assurance procedures of Section 18 of the Part B Permit Application and by providing documentation of financial assurance in at least the amount of the cost estimates required by Permit Conditions 14.4, 14.6 and 14.8. Any proposed changes in the financial assurance mechanisms must be approved by the Director pursuant to 40 CFR 264.142, 264.143, 264.145, 264.146 or 264.147 and in accordance with Permit Condition 1.2.1. The Permittee must comply with both Section 18 of the Part B Permit Application and the requirements of this section.

14.3 MODIFICATIONS

14.3.1 For changes or modifications to the Facility that may affect financial assurance requirements, the Permittee must comply with the requirements of Permit Condition 1.2.

14.4 COST ESTIMATE FOR CLOSURE

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

14.4.1 The Closure Cost Estimate:

14.4.1.1 Must equal the cost of final closure at the point in the Facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by the Facility's Unscheduled Closure Plan (Section 16 of the Part B Permit Application);
[40 CFR 264.142(a)(1)]

14.4.1.2 Must be based on the costs of hiring a third party[i] to close the facility;
[40 CFR 264.142(a)(2)]

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

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

14.4.2 Adjustment for Inflation

14.4.2.1 During the active life of the Facility, the Permittee must annually adjust the closure cost estimate for inflation no later than sixty (60) days prior to the anniversary date of October 15th. The adjustment may be made by recalculating the maximum costs of closure in current dollars, or by using an inflation factor[ii] derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its *Survey of Current Business*. *[40 CFR 264.142(b)]*

14.4.2.2 During the active life of the Facility, the Permittee must revise the closure cost estimate no later than thirty (30) days after the Director has approved the request to modify the Closure Plan, if the change in the Closure Plan increases the cost of closure. The revised closure cost estimate must be adjusted for inflation, as specified in Permit Condition 14.4.2.l.
[40 CFR 264.142(c)]

14.4.3 Recalculate every Five (5) Years

14.4.3.1 During the active life of the Facility, the Permittee must recalculate the closure cost estimate using methods described in Permit Condition 14.4.1 every five (5) years, no later than sixty (60) days prior to the anniversary date of October 15th for that year.

[i] A third party is a party who is neither a parent nor a subsidiary of the Permittee (see definition of Parent Corporation in 40 CFR 264.141(d)).

[ii] The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. Adjustment is made by multiplying the closure cost estimate for the previous year by the inflation factor.

14.4.4 Documentation

The Permittee must keep the following at the Facility during the operating life of the Facility:
[40 CFR 264.142(d)]

1. The latest closure cost estimate prepared in accordance with Permit Conditions 14.4.1 and/or 14.4.3; and
2. When this cost estimate has been adjusted in accordance with Permit Condition 14.4.2, the latest adjusted closure cost estimate along with documentation of how the adjusted cost estimate was derived.

14.5 FINANCIAL ASSURANCE FOR CLOSURE

The Permittee must establish and maintain financial assurance for closure of the Facility in accordance with Sections 16 (Unscheduled Closure Plan) and 18 (Financial Assurance Mechanism) of the Part B Permit Application and comply with the requirements specified below. Any change in the financial assurance mechanism must be approved by the Director in accordance with Permit Condition 1.2.1. At the time this Permit was issued, the Permittee had established a Closure Fund with the State of Nevada and an Insurance Policy as a financial assurance mechanism for closure. *[40 CFR 264.143]*

14.5.1 Closure Fund

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

14.5.1.2 Payments into Fund

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

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

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

14.5.1.3 Change in Closure Cost Estimate

14.5.1.3.1 Whenever the current closure cost estimate increases to an amount greater than the most recent annual valuation of the closure fund, the Permittee, within sixty (60) days after the increase, must either deposit an amount into the closure fund so that its value after this deposit at least

equals the amount of the current closure cost estimate, or provide an alternative financial assurance instrument, as approved by the Director, to cover the difference.

14.5.1.4 Reimbursements

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

14.5.1.5 Termination of Trust *[40 CFR 264.143(i)]*

Pursuant to 40 CFR 264.143(a)(11), the Director shall agree to termination of the trust when:

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

14.5.2 Use of Multiple Financial Mechanisms

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

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

Within sixty (60) days after receiving certifications from the Permittee and an independent Nevada registered Professional Engineer that final closure has been completed in accordance with the approved closure plan, the Director shall notify the Permittee in writing that the Permittee is no longer required by this permit section to maintain financial assurance for final closure of the Facility, unless the Director has reason to believe that final closure has not been in accordance with the approved closure plan. The Director shall provide the Permittee a detailed written statement of any such reason to believe that closure has not been in accordance with the approved closure plan. *[40 CFR 264.143(i)]*

14.6 COST ESTIMATE FOR POST-CLOSURE

The Permittee must maintain a detailed written estimate, in current dollars, of the annual cost of providing at least thirty (30) years of post-closure care and maintenance of the Facility, in accordance with the approved post-closure plan and the requirements in 40 CFR 264.117 through 40 CFR 264.120, and applicable post-closure regulations in 40 CFR 264.228, 264.258, 264.280, 264.310 and 264.603. The Permittee's most recent post-closure cost estimate, prepared in accordance with 40 CFR 264.144(a), is specified in Appendix 16A as part of the Unscheduled Closure Cost Estimate in Section 16 of the Part B Permit Application.

14.6.1 The Post-Closure Cost Estimate:

14.6.1.1 Must be based on the costs of hiring a third party[iii] to conduct the post-closure care activities; and *[40 CFR 264.144(a)(1)]*

14.6.1.2 Is calculated by multiplying the estimated annual cost of providing the post-closure care required under 40 CFR 264.117 through 40 CFR 264.120, by at least thirty (30) years of required post-closure care. *[40 CFR 264.144(a)(2)]*

14.6.2 Adjustment for Inflation

14.6.2.1 During the active life of the Facility, the Permittee must annually adjust the post-closure cost estimate for inflation no later than sixty (60) days prior to the anniversary date of October 15th. The adjustment may be made by recalculating the maximum costs of post-closure in current dollars, or by multiplying the post-closure cost estimate by the inflation factor, as described in Permit Condition 14.4.2.1. The result is the adjusted post-closure cost estimate. *[40 CFR 264.144(b)]*

14.6.2.2 During the active life of the Facility, the Permittee must revise the post-closure cost estimate within thirty (30) days after the Director has approved a request to modify the post-closure plan, if the change in the post-closure plan increases the cost of post-closure care. The revised post-closure cost estimate must be adjusted for inflation, as specified in Permit Condition 14.6.2.1. *[40 CFR 264.144(c)]*

14.6.3 Recalculate every Five (5) Years

14.6.3.1 During the active life of the Facility, the Permittee must recalculate the post-closure cost estimate using methods described in Permit Condition 14.6.1 every five (5) years, no later than sixty (60) days prior to the anniversary date of October 15th for that year.

14.6.4 Documentation

The Permittee must keep the following at the Facility during the operating life of the Facility:

1. The latest post-closure cost estimate prepared in accordance with Permit Conditions 14.6.1 and or 14.6.3; and *[40 CFR 264.144(a) and (c)]*

[iii] A third party is a party who is neither a parent nor a subsidiary of the Permittee (see definition of Parent Corporation in 40 CFR 264.141(d)).

2. When this estimate has been adjusted in accordance with Permit Condition 14.6.2, the latest adjusted post-closure cost estimate along with documentation of how the adjusted cost estimate was derived. *[40 CFR 264.144(b)]*

14.7 FINANCIAL ASSURANCE FOR POST-CLOSURE

The Permittee must establish and maintain financial assurance for post-closure care of the Facility in accordance with Sections 17 (Post Closure Care Plan) and 18 (Financial Assurance Mechanism) of the Part B Permit Application and comply with the requirements specified below. Any change in the financial assurance mechanism must be approved by the Director in accordance with Permit Condition 1.2.1. *[40 CFR 264.145]*

14.7.1 Post-Closure Fund

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

14.7.1.2 Payments into the fund may be made by the Permittee over the term of the RCRA Permit or over the remaining operating life of the Facility as estimated in the approved Closure Plan, whichever period is shorter and complies with the Director's requirements. The payments into the post-closure fund must be made as required by the Director.

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

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

14.7.1.5 Change in Post-Closure Cost Estimate

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

14.7.1.5.2 During the operating life of the Facility, if the value of the closure fund is greater than the combined total amount of both the current closure cost estimate and the post-closure cost estimate, the Permittee may submit a written request to the Director for refund of the amount in excess of the current closure and post-closure cost estimate. One written request for refund

may be submitted each year, and such request shall be made within thirty (30) days after the NDEP's approval of the annual closure and post-closure cost estimate update.

14.7.1.6 Release of Funds

Within sixty (60) days after receiving a request from the Permittee for release of funds, as specified in Permit Condition 14.7.1.5.2, the Director will provide a written response to the Permittee identifying the amount approved to be released from the closure fund.

14.7.1.7 Reimbursements

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

14.7.1.7.2 During the period of post-closure care, the Permittee, or another person authorized to conduct post-closure care, may request reimbursements from the established post-closure fund for post-closure expenditures by submitting itemized bills to the Director. The Permittee shall only request reimbursements for post-closure care if sufficient funds are remaining in the post-closure fund to cover the maximum costs of providing the remaining post-closure care of the Facility. Within sixty (60) days after receiving bills for post-closure care activities, the Director shall issue a written response specifying the amount of the reimbursement authorized, if the Director determines that the post-closure care expenditures are in accordance with the approved post-closure plan, or otherwise justified. If the Director has reason to believe that the maximum cost of post-closure care over the remaining post-closure period will be significantly greater than the existing value in the post-closure fund, he may withhold reimbursements of such amounts as he deems prudent until he determines, in accordance with 40 CFR 264.145(i), that the Permittee is no longer required to maintain financial assurance for post-closure care of the Facility. If the Director does not make such reimbursements, he will provide the Permittee with a detailed written statement of reasons. *[40 CFR 264.145(a)(10)]*

14.7.1.8 Termination of Trust *[40 CFR 264.145(i)]*

Pursuant to 40 CFR 264.145(a)(12), the Director may agree to termination of the trust when:

1. The Permittee substitutes alternate financial assurance, as accepted by the Director; or
2. The Director releases the Permittee from the requirements of this Permit Condition 14.7, in accordance with Permit Condition 14.7.2

14.7.2 Release of the Permittee from the Requirements of Financial Assurance for Post-Closure Care

Within sixty (60) days after receiving certifications from the Permittee and an independent Nevada registered Professional Engineer that the post-closure care period has been completed in accordance with the approved post-closure care plan, the Director shall notify the Permittee in writing that the Permittee is no longer required by this Permit Section to maintain financial assurance for post-closure care of the Facility, unless the Director has reason to believe that the post-closure care has not been in accordance with the approved post-closure plan. The Director

shall provide the Permittee a detailed written statement of any such reason to believe that the post-closure care has not been in accordance with the approved post-closure care plan.

[40 CFR 264.145(i)]

14.8 COST ESTIMATE AND FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

The Permittee must establish a cost estimate and maintain financial assurance for any remedial or corrective actions required at the Facility as a result of a release of hazardous waste(s) and in accordance with the respective corrective measures study, the approved corrective measure implementation workplans, and the requirements specified below. Any changes in the financial assurance mechanism must be approved by the Director in accordance with Permit Condition 1.2.

14.8.1 The cost estimate for corrective action must be:

1. Based on the costs of hiring a third party[iv] to conduct the corrective action activities; and
2. Calculated by multiplying the annual corrective action cost by the number of years of corrective action required by the Director.

14.8.2 Adjustment for Inflation

When required to perform Corrective Action, during the active life of the Facility, the Permittee must annually adjust the corrective action cost estimate for inflation within sixty (60) days prior to the anniversary date of October 15th. The adjustment may be made by either recalculating the maximum costs of corrective action in current dollars, or by multiplying the corrective action cost estimate by the inflation factor, as described in Permit Condition 14.4.2. The result is the adjusted Corrective Action cost estimate.

14.8.3 During the active life of the Facility, the Permittee must revise the corrective action cost estimate no later than thirty (30) days after the Director has approved a request to modify the Corrective Action Plan, if the change in the Corrective Action Plan increases the cost of corrective action. The revised corrective action cost estimate must be adjusted for inflation, as specified in Permit Condition 14.8.2. *[40 CFR 264.142(c)]*

14.8.4 Documentation

The Permittee must keep the following at the Facility during the operating life of the Facility:

1. The latest corrective action cost estimate prepared in accordance with Permit Condition 14.8.1; and
2. When this cost estimate has been adjusted in accordance with Permit Condition 14.8.2, the latest adjusted corrective action cost estimate along with documentation of how the adjusted cost estimate was derived.

14.8.5 Financial Assurance

14.8.5.1 The Permittee may satisfy the requirements of this section by establishing a corrective action

[iv] A third party is a party who is neither a parent nor a subsidiary of the Permittee (see definition of Parent Corporation in 40 CFR 264.141(d)).

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

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

14.8.6 Release from the Requirements of Financial Assurance for Corrective Action

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

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

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

14.10 LIABILITY REQUIREMENTS ~ SUDDEN & NON-SUDDEN OCCURRENCES

The Permittee must demonstrate continuous compliance with Section 18.1.0 (Coverage for Sudden and Non-Sudden Accidental Occurrences) of the Part B Permit Application and 40 CFR 264.147(a) to maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs. The Permittee must also demonstrate continuous compliance with 40 CFR 264.147(b) to maintain liability coverage for non-sudden accidental occurrences in the amount of at least $3 million per occurrence, with an annual aggregate of at least $6 million, exclusive of legal defense costs. *[40 CFR 264.147]*

14.10.1 Coverage for Sudden Accidental Occurrences

The Permittee must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the Facility. The Permittee must have and maintain liability coverage for sudden accidental occurrences in

the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs. This liability coverage may be demonstrated by having liability insurance, as follows: *[40 CFR 264.147(a)]*

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

14.10.1.1 The Permittee must notify the Director, in writing, within thirty (30) days, whenever:

1. A claim results in a reduction in the amount of financial assurance for liability coverage provided by a financial instrument authorized in Permit Condition 14.10.1; or
2. A Certification of Valid Claim for bodily injury or property damages caused by a sudden accidental occurrence arising from the operation of the Facility is entered between the Permittee and third party claimant for liability coverage under Permit Condition 14.10.1; or
3. A final court order establishing a judgment for bodily injury or property damage caused by a sudden accidental occurrence arising from the operation of the Facility is issued against the Permittee or an instrument that is providing financial assurance for liability coverage under Permit Condition 14.10.1.

14.10.2 Coverage for Non-Sudden Accidental Occurrences

The Permittee must demonstrate financial responsibility for bodily injury and property damage to third parties caused by non-sudden accidental occurrences arising from operations of the Facility. The Permittee must have and maintain liability coverage for non-sudden accidental occurrences in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million, exclusive of legal defense costs. As the Permittee must meet the requirements of this section, the Permittee may combine the required per-occurrence coverage levels for both sudden and non-sudden accidental occurrences into a single annual aggregate level. Owners or operators who combine coverage levels for sudden and non-sudden accidental occurrences must maintain liability coverage in the amount of at least $4 million per occurrence and $8 million annual aggregate. This liability coverage may be demonstrated by having liability insurance, as follows: *[40 CFR 264.147(b)]*

1. Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in 40 CFR 264.151(i). The wording of the certificate of insurance must be identical to the wording specified in 40 CFR 264.151(j). The Permittee must submit a signed duplicate original

of the endorsement or the certificate of insurance to the Director. If requested by the Director, the Permittee must provide a signed duplicate original of the insurance policy.

2. Each insurance policy must be issued by an insurer, which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States, including Nevada.

14.10.2.1 The Permittee must notify the Director, in writing, within thirty (30) days, whenever:

1. A claim results in a reduction in the amount of financial assurance for liability coverage provided by a financial instrument authorized in Permit Condition 14.10.2; or
2. A Certification of Valid Claim for bodily injury or property damages caused by a non-sudden accidental occurrence arising from the operation of the Facility is entered between the Permittee and third party claimant for liability coverage under Permit Condition 14.10.2; or
3. A final court order establishing a judgment for bodily injury or property damage caused by a non-sudden accidental occurrence arising from the operation of the Facility is issued against the Permittee or an instrument that is providing financial assurance for liability coverage under Permit Condition 14.10.2.

14.10.3 Adjustments by the Director

If the Director determines that the levels of financial responsibility required are not consistent with the degree and duration of risk associated with the Facility, the Director may adjust the level of financial responsibility required under this section, as may be necessary, to protect human health and the environment. The adjusted level will be based on the Director's assessment of the degree and duration of risk associated with the operation of the Facility. In addition, if the Director determines that there is significant risk to human health or the environment from non-sudden accidental occurrences resulting from the operations of the Facility, he may require that the Permittee comply with 40 CFR 264.147(b). The Permittee must furnish to the Director, within a reasonable time, any information which the Director requests, to determine whether cause exists for such adjustments of level or type of coverage. Any adjustment of the level or type of coverage for a Facility that has a permit will be treated as a permit modification under 40 CFR 270.41(a)(2) and 40 CFR 124.5 and comply with Permit Condition 1.2.1. *[40 CFR 264.147(d)]*

14.10.4 Period of Coverage

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

14.11 INCAPACITY OF THE OWNERS, OPERATORS, GUARANTORS OR FINANCIAL INSTITUTIONS

14.11.1 Notification

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

[40 CFR 264.148(a)]

14.11.2 Establishment of Financial Assurance

The Permittee will be deemed to be without the required financial assurance or liability coverage in the event of bankruptcy of a trustee or issuing institution, or a suspension or revocation of the authority of an institution issuing a surety bond or insurance policy utilized to satisfy the financial assurance obligations of the Facility. The Permittee shall establish other financial assurance or liability coverage within sixty (60) days after such an event.

[40 CFR 264.148(b)]

14.12 COMPLIANCE SCHEDULE

The Permittee must perform the following task(s) by the listed due date(s):

	Task	Date Due
1	*Reserved*	

RCRA Permit Renewal Application, Part A (*attached*)

PART A

RCRA PERMIT APPLICATION

FEBRUARY 2025

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (Select only one.)

☐	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
	☐ Site was a TSD facility, a reverse distributor, and/or generator of ≥ 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in **one or more months of the reporting year** (or State equivalent LQG regulations)
☐	Notifying that regulated activity is no longer occurring at this Site
☐	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
☑	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

N	V	T	3	3	0	0	1	0	0	0	0

3. Site Name

US Ecology Nevada, Inc

4. Site Location Address

Street Address: HWY 95, 11 Miles S of Beatty		
City, Town, or Village: Beatty		County: Nye
State: Nevada	Country: USA	Zip Code: 89003
Latitude: 36° 46' 9"	Longitude: 116° 41' 23"	☐ Use Lat/Long as Primary Address

5. Site Mailing Address ☐ Same as Location Street Address

Street Address: PO Box 578		
City, Town, or Village: Beatty		
State: Nevada	Country: USA	Zip Code: 89003

6. Site Land Type

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

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary) 562211	C.
B.	D.

8. Site Contact Information

☐ Same as Location Address

First Name **Pierre-luc**	MI	Last Name **Juteau**
Title **General Manager**		
Street Address **PO Box 578**		
City, Town, or Village **Beatty**		
State **Nevada**	Country **USA**	Zip Code **89003**
Email **pjuteau@republicservices.com**		
Phone **800-239-3943**	Ext	Fax **775-553-2125**

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

☐ Same as Location Address

Full Name **Nevada Division of State Lands**	Date Became Owner (mm/dd/yyyy) **1/1/1961**

Owner Type

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

Street Address **901 S Stewart St, Suite 5003**		
City, Town, or Village **Carson City**		
State **Nevada**	Country **USA**	Zip Code **89701-5246**
Email **cdonohue@lands.nv.gov**		
Phone **775-648-2720**	Ext	Fax
Comments **Mr. Donohue is the Administrator of the Nevada Division of State Lands**		

B. Name of Site's Legal Operator

☐ Same as Location Address

Full Name **US Ecology Nevada, Inc**	Date Became Operator (mm/dd/yyyy) **1/1/1970**

Operator Type

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

Street Address **PO Box 578**		
City, Town, or Village **Beatty**		
State **Nevada**	Country **USA**	Zip Code **89003**
Email **pjuteau@republicservices.com**		
Phone **800-239-3943**	Ext	Fax **775-553-2125**
Comments		

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

☑ Y ☐ N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
☑	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
☐	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
☐	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
☐ Y ☑ N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. *Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.*	
☑ Y ☐ N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
☑ Y ☐ N	4. Receives Hazardous Waste from Off-site	
☑ Y ☐ N	5 Recycler of Hazardous Waste	
☑	a. Recycler who stores prior to recycling	
☐	b. Recycler who does not store prior to recycling	
☐ Y ☑ N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
☐	a. Small Quantity On-site Burner Exemption	
☐	b. Smelting, Melting, and Refining Furnace Exemption	

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

See	Atta	ched	EPA	List		

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

See	Attach	ed	CA	List		

ITEM 10.B
Waste Codes for Federally Regulated Hazardous Wastes

D001	F008	K031	K109	P009	P067	P185	U036	U089	U142	U193	U364
D002	F009	K032	K110	P010	P068	P188	U037	U090	U143	U194	U367
D003	F010	K033	K111	P011	P069	P189	U038	U091	U144	U196	U372
D004	F011	K034	K112	P012	P070	P190	U039	U092	U145	U197	U373
D005	F012	K035	K113	P013	P071	P191	U041	U093	U146	U200	U387
D006	F019	K036	K114	P014	P072	P192	U042	U094	U147	U201	U389
D007	F020	K037	K115	P015	P073	P194	U043	U095	U148	U203	U394
D008	F021	K038	K116	P016	P074	P196	U044	U096	U149	U204	U395
D009	F022	K039	K117	P017	P075	P197	U045	U097	U150	U205	U404
D010	F023	K040	K118	P018	P076	P198	U046	U098	U151	U206	U409
D011	F024	K041	K123	P020	P077	P199	U047	U099	U152	U207	U410
D012	F025	K042	K124	P021	P078	P201	U048	U101	U153	U208	U411
D013	F026	K043	K125	P022	P081	P202	U049	U102	U154	U209	
D014	F027	K044	K126	P023	P082	P203	U050	U103	U155	U210	
D015	F028	K045	K131	P024	P084	P204	U051	U105	U156	U211	
D016	F032	K046	K132	P026	P085	P205	U052	U106	U157	U213	
D017	F034	K047	K136	P027	P087	U001	U053	U107	U158	U214	
D018	F035	K048	K141	P028	P088	U002	U055	U108	U159	U215	
D019	F037	K049	K142	P029	P089	U003	U056	U109	U160	U216	
D020	F038	K050	K143	P030	P092	U004	U057	U110	U161	U217	
D021	F039	K051	K144	P031	P093	U005	U058	U111	U162	U218	
D022	K001	K052	K145	P033	P094	U006	U059	U112	U163	U219	
D023	K002	K060	K147	P034	P095	U007	U060	U113	U164	U220	
D024	K003	K061	K148	P036	P096	U008	U061	U114	U165	U221	
D025	K004	K062	K149	P037	P097	U009	U062	U115	U166	U222	
D026	K005	K069	K150	P038	P098	U010	U063	U116	U167	U223	
D027	K006	K071	K151	P039	P099	U011	U064	U117	U168	U225	
D028	K007	K073	K156	P040	P101	U012	U066	U118	U169	U226	
D029	K008	K083	K157	P041	P102	U014	U067	U119	U170	U227	
D030	K009	K084	K158	P042	P103	U015	U068	U120	U171	U228	
D031	K010	K085	K159	P043	P104	U016	U069	U121	U172	U234	
D032	K011	K086	K161	P044	P105	U017	U070	U122	U173	U235	
D033	K013	K087	K169	P045	P106	U018	U071	U123	U174	U236	
D034	K014	K088	K170	P046	P108	U019	U072	U124	U176	U237	
D035	K015	K093	K171	P047	P109	U020	U073	U125	U177	U238	
D036	K016	K094	K172	P048	P110	U021	U074	U126	U178	U239	
D037	K017	K095	K174	P049	P111	U022	U075	U127	U179	U240	
D038	K018	K096	K175	P050	P112	U023	U076	U128	U180	U243	
D039	K019	K097	K176	P051	P113	U024	U077	U129	U181	U244	
D040	K020	K098	K177	P054	P114	U025	U078	U130	U182	U246	
D041	K021	K099	K178	P056	P115	U026	U079	U131	U183	U247	
D042	K022	K100	K181	P057	P116	U027	U080	U132	U184	U248	
D043	K023	K101	P001	P058	P118	U028	U081	U133	U185	U249	
F001	K024	K102	P002	P059	P119	U029	U082	U134	U186	U271	
F002	K025	K103	P003	P060	P120	U030	U083	U135	U187	U278	
F003	K026	K104	P004	P062	P121	U031	U084	U136	U188	U279	
F004	K027	K105	P005	P063	P122	U032	U085	U137	U189	U280	
F005	K028	K106	P006	P064	P123	U033	U086	U138	U190	U328	
F006	K029	K107	P007	P065	P127	U034	U087	U140	U191	U353	
F007	K030	K108	P008	P066	P128	U035	U088	U141	U192	U359	

ITEM 10-C CALIFORNIA WASTE CODES

California Restricted Wastes – Use First , if applicable	
711	Liquids with cyanides ≥ 1000 mg/l
721	Liquids with arsenic ≥ 500 mg/l
722	Liquids with cadmium ≥ 100 mg/l
723	Liquids with chromium (VI) ≥ 500 mg/l
724	Liquids with lead ≥ 500 mg/l
725	Liquids with mercury ≥ 20 mg/l
726	Liquids with nickel ≥ 134 mg/l
727	Liquids with selenium ≥ 100 mg/l
728	Liquids with thallium ≥ 130 mg/l
731	Liquids with polychlorinated biphenyls ≥ 50 mg/l
741	Liquids with halogenated organic compounds ≥ 1000 mg/l
751	Solids or sludges with halogenated organic comp. 1000 mg/kg
791	Liquids with pH ≤ 2
792	Liquids with pH ≤ 2 with metals
801	Waste potentially containing dioxins

CALIFORNIA NON-RESTRICTED WASTES Inorganics	
121	Alkaline solution (pH ≥12.5) with metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc)
122	Alkaline solution without metals (pH ≥ 12.5)
123	Unspecified alkaline solution
131	Aqueous solution (2 < pH < 12.5) containing reactive anions (azide, bromate, chlorate, cyanide, fluoride, hypochlorite, nitrite, perchlorate, and sulfide anions)
132	Aqueous solution w/metals (< restricted levels and see waste code 121 for a list of metals)
133	Aqueous solution with 10% or more total organic residues
134	Aqueous solution with <10% total organic residues
135	Unspecified aqueous solution
141	Off-specification, aged, or surplus inorganics
151	Asbestos-containing waste
161	Fluid-cracking catalyst (FCC) waste
162	Other spent catalyst
171	Metal sludge (see 121)
172	Metal dust (see 121) and machining waste
181	Other inorganic solid waste

Organics	
211	Halogenated solvents (chloroform, methyl chloride, perchloroethylene, etc.)
212	Oxygenated solvents (acetone, butanol, ethyl acetate, etc.)
213	Hydrocarbon solvents (benzene, hexane, Stoddard, etc.)
214	Unspecified solvent mixture
221	Waste oil and mixed oil
222	Oil/water separation sludge
223	Unspecified oil-containing waste
231	Pesticide rinse water
232	Pesticides and other waste associated with pesticide production
241	Tank bottom waste
251	Still bottoms with halogenated organics
252	Other still bottom waste
261	Polychlorinated biphenyls and material containing PCB's
271	Organic monomer waste (includes unreacted resins)
272	Polymeric resin waste
281	Adhesives
291	Latex waste
311	Pharmaceutical waste
321	Sewage sludge
322	Biological waste other than sewage sludge
331	Off-specification, aged, or surplus organics
341	Organic liquids (nonsolvents) with halogens
342	Organic liquids with metals (see 121)
343	Unspecified organic liquid mixture
351	Organic solids with halogens
352	Other organic solids

Sludges	
411	Alum and gypsum sludge
421	Lime sludge
431	Phosphate sludge
441	Sulfur sludge
451	Degreasing sludge
461	Paint sludge
471	Paper sludge/pulp
481	Tetraethyl lead sludge
491	Unspecified sludge waste

Miscellaneous	
511	Empty pesticide containers 30 gallons or more
512	Other empty containers 30 gallons or more
513	Empty containers less than 30 gallons
521	Drilling mud
531	Chemical toilet waste
541	Photochemicals / photoprocessing waste
551	Laboratory waste chemicals
561	Detergent and soap
571	Fly ash, bottom ash, and retort ash
581	Gas scrubber waste
591	Baghouse waste
611	Contaminated soil from site clean-ups
612	Household waste
613	Auto shredder waste

HW REPORT MANAGEMENT METHOD CODES New Codes	Descriptions
H010	Metals recovery including retorting, smelting, chemicals, etc.
H020	Solvents recovery
H039	Other recovery of reclamation for reuse including acid regeneration, organics recovery, etc.
H050	Energy recovery at this site -- use as fuel (includes on-site fuel blending)
H061	Fuel blending prior to energy recovery at another site
H040	Incineration--thermal destruction other than use as a fuel
H071	Chemical reduction with or without precipitation
H073	Cyanide destruction with or without precipitation
H075	Chemical oxidation
H076	Wet air oxidation
H077	Other chemical precipitation with or without pre-treatment
H081	Biological treatment with or without precipitation
H082	Adsorption
H083	Air or steam stripping
H101	Sludge treatment and/or dewatering
H103	Absorption
H111	Stabilization or chemical fixation prior to disposal at another site
H112	Macro-encapsulation prior to disposal at another site
H121	Neutralization only
H122	Evaporation
H123	Settling or clarification
H124	Phase separation
H129	Other treatment
H131	Land treatment or application (to include on-site treatment and/or stabilization)
H132	Landfill or surface impoundment that will be closed as landfill (to include on-site treatment and/or stabilization)
H134	Deepwell or underground injection (with or without treatment)
H135	Discharge to sewer/POTW or NPDES (with prior storage--with or without treatment)
H141	Storage, bulking, and/or transfer off site--no treatment/recovery (H010-H129), fuel blending (H061), or disposal (H131-H135) at this site

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)

A. Other Waste Activities

☐ Y ☑ N	1. Transporter of Hazardous Waste—If "Yes", mark all that apply.
☐	a. Transporter
☐	b. Transfer Facility (at your site)
☐ Y ☑ N	2. Underground Injection Control
☑ Y ☐ N	3. United States Importer of Hazardous Waste
☐ Y ☑ N	4. Recognized Trader—If "Yes", mark all that apply.
☐	a. Importer
☐	b. Exporter
☐ Y ☑ N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark all that apply.
☐	a. Importer
☐	b. Exporter

B. Universal Waste Activities

☑ Y ☐ N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that apply. Note: Refer to your State regulations to determine what is regulated.
☑	a. Batteries
☐	b. Pesticides
☑	c. Mercury containing equipment
☑	d. Lamps
☑	e. Aerosol Cans
☐	f. Other (specify) _____
☐	g. Other (specify) _____
☑ Y ☐ N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

☐ Y ☑ N	1. Used Oil Transporter—If "Yes", mark all that apply.
☐	a. Transporter
☐	b. Transfer Facility (at your site)
☐ Y ☑ N	2. Used Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
☐	a. Processor
☐	b. Re-refiner
☐ Y ☑ N	3. Off-Specification Used Oil Burner
☐ Y ☑ N	4. Used Oil Fuel Marketer—If "Yes", mark all that apply.
☐	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐	b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Pharmaceutical Activities

☑ Y ☐ N		1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if "Yes", mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
	☐	a. Healthcare Facility
	☑	b. Reverse Distributor
☐ Y ☑ N		2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

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

☐ Y ☑ N		A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If "Yes", mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
	☐	1. College or University
	☐	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
	☐	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
☐ Y ☐ N		B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

☐ Y ☑ N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If "Yes", you must fill out the Addendum for Episodic Generator.

14. LQG Consolidation of VSQG Hazardous Waste

☐ Y ☑ N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

☐ Y ☑ N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
	A. ☐ Central Accumulation Area (CAA) or ☐ Entire Facility
	B. Expected closure date: _____ mm/dd/yyyy
	C. Requesting new closure date: _____ mm/dd/yyyy
	D. Date closed : _____ mm/dd/yyyy ☐ 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) ☐ 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

16. Notification of Hazardous Secondary Material (HSM) Activity

☐ Y ☑ N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.

17. Electronic Manifest Broker

☐ Y ☑ N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?

18. Comments (include item number for each comment)

10.C. USEN accepts state regulated wastes from inside and outside Nevada for treatmetn, storage, and disposal. State regulated wastes are managed per NAC 444 and NRS 459.

19. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11)**.

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Signed by: Pierre-luc Juteau E8F2085D79B0486...	**12/15/2025**
Printed Name (First, Middle Initial Last) **Pierre-luc Juteau**	Title **General Manager**
Email **pjuteau@republicservices.com**	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	Pierre-luc	MI		Last Name	Juteau
Title	General Manager				
Email	pjuteau@republicservices.com				
Phone	800-239-3943	Ext		Fax	775-553-2125

2. Facility Permit Contact Mailing Address

Street Address	PO Box 578		
City, Town, or Village	Beatty		
State	Nevada	Country	USA
Zip Code	89003		

3. Facility Existence Date (mm/dd/yyyy)

1/1/1970

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
R	NEVHW00251	NDEP- Hazardous Waste Permit
P	AP4953-0184-5	NDEP- State Air Permit
E	NVT330010000	EPA region IX- TSCA Permit
E	P330-21-00184	USDA-Soil Permit, APHIS
E	NVR500000	NDEP- Stormwater Permit
E		CAPP- Permit to Operate- Aerosol recyclir

5. Nature of Business

Treatment, storage, and disposal for RCRA and TSCA regulated wastes and non-hazardous wastes. Treatment options include stabilization, neutralization, solidification, chemical oxidation, encapsulation and deactivation. Management options also include aerosol can recovery and recycling and container re-use.

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity (1) Amount	B. Process Design Capacity (2) Unit of Measure	C. Process Total Number of Units	D. Unit Name
0	1	S	0	1	8,094	Y	08	CMU #1, 6, 7, 16, 17, 19, 20
0	2	S	0	2	42,615	G	09	Tanks 4 to 7, 20, 21, 25, 28
0	3	T	0	1	10,000	U	01	Evap Tank 11
0	4	T	0	1	3,330,480	U	09	Tanks 2, 3, 18, 19, 22 to 24
L	i	n	e	s	5 to 7	on		Attached Page 11

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes (1) Process Codes								D. Processes (2) Process Description (if code is not entered in 7.D1))
S	e	e				Attached	Continuati	o	n		P	a	g	e	s	Attached Pages 13 to 2

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

See continuation of Item 6 - Attached as Pages 11 and 12
See continuation of Item 7 - Attached as Pages 13 to 20.
Attached are an Area Topgraphic Map (Page 21), a facility drawing showing site features (Page 22), and site photographs (Pages 23 to 36).

Section 6 Details:

Line 1:	**S01-Container storage (as further detailed on Page 12)**
CMU #1:	294 cubic yards.
CMU #6:	1,249 cubic yards.
CMU #7:	400 cubic yards.
CMU #16:	1,221 cubic yards.
CMU #17:	3,439 cubic yards.
CMU #19:	1,009 cubic yards
CMU #20:	1.7 cubic yards
CMU #21	480 cubic yards
Total line 1:	8,094 cubic yards.

Line 2:	**S02-Tank Storage (as further detailed on Page 12)**
PCB Tanks:	Tank 4 7,500 gallons; Tank 5 5,000 gallons; Tank 6 5,000 gallons; and Tank 7 7,500 gallons.
Lab Tanks:	Main Lab Tank 20 - 405 gallons; Satellite Lab Tank 21 - 405 gallons; and Satellite Lab 2 Tank 25 - 405 gallons.
Treatment/Neutralization:	
Tanks:	Tank 28 8,200 gallons and Tank 29 8,200 gallons
Total Line 2:	42,615 gallons.

Line 3:	**T01-Tank Treatment**
Evaporation Tank:	Tank 11 10,000 gallons/day.
Total Line 3:	10,000 gallons/day.

Line 4:	**T01-Tank Treatment (as further detailed on Page 12)**
Stabilization Tanks:	Tank 2 426,000 gallons/day; Tank 3 426,000 gallons/day; Tank 18 207,000 gallons/day; Tank 19 207,000 gallons/day; Tank 22 482,400 gallons/day; Tank 23 482,400 gallons/day; and Tank 24 278,400 gallons/day
Neut./Stab. Tanks:	Tank 26 410,640 gallons/day and Tank 27 410,640 gallons/day.
Total Line 4:	3,330,480 gallons/day

Line 5:	**D80- Landfill Disposal**
Trench 13:	8,600,000 cubic yards (above and below grade).
Total Line 5:	8,600,000 cubic yards.
Landfill Debris Categories:	Toxicity characteristic debris Debris contaminated with listed waste Cyanide reactive debris Waste PCB debris

Line 6:	**S03 Waste Pile**
WP-1	38 cubic yards

Line 7:	**X02 Mechanical Processing**
WG-1	Throughput to be determined

CMU Capacities and Tank Capacities and Maximum Throughput

CMU #	Common Name	Permit Required	Storage Capacity		
			Gallons	55-gallon Drums	yds^3
1	PCB/RCRA Processing and DEA Storage Building and PCB/RCRA Processing and DEA Storage Building	Yes	59,400	1,080	294
6	Dry Hazardous Waste Storage Area 2	Yes	252,340	4,588	1,249
7	Bin Storage Pad	Yes	80,790	1,469	400
16	Container Management and Storage Building 1 (CMS 1)	Yes	246,510	4,482	1,221
17	Dry Hazardous Waste Storage Area 3	Yes	694,485	12,627	3,439
19	Container Management and Storage Building 2 (CMS 2)	Yes	203,720	3,704	1,009
20	Satellite Laboratory 2	Yes	500	9	2.5
21	Dry Hazardous Waste Storage Area 4	Yes	96,800	1,760	480
	CMU Storage (Total RCRA Permit Part A Section 6 Line 1)		1,634,545	29,719	8,095

Tank #	Common Name	Permit Required	Year Installed	Capacity	Thoughput
				[gallons]	(gallons/day)
2	Outdoor Stabilization Tank (aka Pan 2)	Yes	2002	35,500	426,000
3	Outdoor Stabilization Tank (aka Pan 3)	Yes	2002	35,500	426,000
4	PCB Storage Tank	Yes	Mid-1980's	7,500	
5	PCB Storage Tank	Yes	Mid-1980's	5,000	
6	PCB Storage Tank	Yes	Mid-1980's	5,000	
7	PCB Storage Tank	Yes	Mid-1980's	7,500	
11	Decontamination Pad and Evaporation Tank	Yes	1991	10,000	10,000
18	Stabilization Building 1 Tank (aka Pan 4)	Yes	2007	17,250	207,000
19	Stabilization Building 1 Tank (aka Pan 5)	Yes	2007	17,250	207,000
20	Main Laboratory Rinse Water Tank	Yes	2013	405	
21	Satellite Laboratory 1 Rinse Water Tank	Yes	2017	405	
22	Stabilization Building 2 Tank (aka Pan 6)	Yes	2024	40,200	482,400
23	Stabilization Building 2 Tank (aka Pan 7)	Yes	2024	40,200	482,400
24	Stabilization Building 2 Tank (aka Pan 8)	Yes	2024	23,200	278,400
25	Satellite Laboratory 2 Rinse Water Tank	Yes	2024	405	
26	Reactor Tank (Neutralization/Stabilization) 1	Yes	2024	17,110	410,640
27	Reactor Tank (Neutralization/Stabilization) 2	Yes	2024	17,110	410,640
28	Liquid Storage/Consolidation 1	Yes	2024	8,200	
29	Liquid Storage/Consolidation 2	Yes	2024	8,200	
	Tank Storage (Total RCRA Permit Part A Section 6 Line 2)				42,615
	Treatment-Decon (Total RCRA Permit Part A Section 6 Line 3)				10,000
	Treatment/Stabilization (Total RCRA Permit Part A Section 6 Line4)				3,330,480

Assumptions for Througput Calculations		
Stabilization Throughput	1	cycle per hour
Stabilization Operations	24	hours per day
Fill Capacity	50%	
Reactor Throughput	1	cycle per hour
Reactor Operations	24	hours per day
Fill Capacity	100%	

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1)
1	D001	805	T	S01 T01 D80 S03	S02 X02
2	D002	16,748	T	S01 T01 D80 S03	S02
3	D003	18,236	T	S01 T01 D80 S03	S02 X02
4	D004	11,492	T	S01 T01 D80 S03	S02
5	D005	6,819	T	S01 T01 D80 S03	S02
6	D006	21,289	T	S01 T01 D80 S03	S02
7	D007	26,115	T	S01 T01 D80 S03	S02
8	D008	86,307	T	S01 T01 D80 S03	S02
9	D009	5,781	T	S01 T01 D80 S03	S02
10	D010	8,465	T	S01 T01 D80 S03	S02
11	D011	15,333	T	S01 T01 D80 S03	S02
12	D012	1,267	T	S01 T01 D80 S03	S02
13	D013	111	T	S01 T01 D80 S03	S02
14	D014	111	T	S01 T01 D80 S03	S02
15	D015	189	T	S01 T01 D80 S03	S02
16	D016	113	T	S01 T01 D80 S03	S02
17	D017	111	T	S01 T01 D80 S03	S02
18	D018	767	T	S01 T01 D80 S03	S02
19	D019	160	T	S01 T01 D80 S03	S02
20	D020	179	T	S01 T01 D80 S03	S02
21	D021	144	T	S01 T01 D80 S03	S02
22	D022	334	T	S01 T01 D80 S03	S02
23	D023	130	T	S01 T01 D80 S03	S02
24	D024	130	T	S01 T01 D80 S03	S02
25	D025	130	T	S01 T01 D80 S03	S02
26	D026	223	T	S01 T01 D80 S03	S02
27	D027	133	T	S01 T01 D80 S03	S02
28	D028	317	T	S01 T01 D80 S03	S02
29	D029	142	T	S01 T01 D80 S03	S02
30	D030	186	T	S01 T01 D80 S03	S02
31	D031	111	T	S01 T01 D80 S03	S02
32	D032	205	T	S01 T01 D80 S03	S02
33	D033	135	T	S01 T01 D80 S03	S02
34	D034	122	T	S01 T01 D80 S03	S02
35	D035	31	T	S01 T01 D80 S03	S02
36	D036	130	T	S01 T01 D80 S03	S02
37	D037	214	T	S01 T01 D80 S03	S02
38	D038	222	T	S01 T01 D80 S03	S02
39	D039	530	T	S01 T01 D80 S03	S02
40	D040	510	T	S01 T01 D80 S03	S02
41	D041	122	T	S01 T01 D80 S03	S02
42	D042	122	T	S01 T01 D80 S03	S02
43	D043	227	T	S01 T01 D80 S03	S02
44	F001	574	T	S01 T01 D80 S03	S02
45	F002	2,082	T	S01 T01 D80 S03	S02
46	F003	1,109	T	S01 T01 D80 S03	S02
47	F004	353	T	S01 T01 D80 S03	S02
48	F005	837	T	S01 T01 D80 S03	S02
49	F006	9,643	T	S01 T01 D80 S03	S02
50	F007	4,328	T	S01 T01 D80 S03	S02
51	F008	3,275	T	S01 T01 D80 S03	S02
52	F009	2,988	T	S01 T01 D80 S03	S02
53	F010	1,016	T	S01 T01 D80 S03	S02
54	F011	2,128	T	S01 T01 D80 S03	S02
55	F012	3,060	T	S01 T01 D80 S03	S02
56	F019	3,620	T	S01 T01 D80 S03	S02
57	F020	49	T	S01 T01 D80	S02
58	F021	49	T	S01 T01 D80	S02
59	F022	1	T	S01 T01 D80	S02
60	F023	1	T	S01 T01 D80	S02
61	F024	1	T	S01 T01 D80 S03	S02
62	F025	49	T	S01 T01 D80 S03	S02
63	F026	49	T	S01 T01 D80	S02
64	F027	49	T	S01 T01 D80	S02
65	F028	49	T	S01 T01 D80 S03	S02
66	F032	148	T	S01 T01 D80 S03	S02
67	F034	127	T	S01 T01 D80 S03	S02
68	F035	208	T	S01 T01 D80 S03	S02
69	F037	247	T	S01 T01 D80 S03	S02
70	F038	150	T	S01 T01 D80 S03	S02
71	F039	611	T	S01 T01 D80 S03	S02
72	K001	80	T	S01 T01 D80 S03	S02
73	K002	72	T	S01 T01 D80 S03	S02
74	K003	72	T	S01 T01 D80 S03	S02

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1)
75	K004	72	T	S01 T01 D80 S03	S02
76	K005	72	T	S01 T01 D80 S03	S02
77	K006	72	T	S01 T01 D80 S03	S02
78	K007	72	T	S01 T01 D80 S03	S02
79	K008	72	T	S01 T01 D80 S03	S02
80	K009	72	T	S01 T01 D80 S03	S02
81	K010	72	T	S01 T01 D80 S03	S02
82	K011	72	T	S01 T01 D80 S03	S02
83	K013	23	T	S01 T01 D80 S03	S02
84	K014	23	T	S01 T01 D80 S03	S02
85	K015	23	T	S01 T01 D80 S03	S02
86	K016	72	T	S01 T01 D80 S03	S02
87	K017	72	T	S01 T01 D80 S03	S02
88	K018	72	T	S01 T01 D80 S03	S02
89	K019	72	T	S01 T01 D80 S03	S02
90	K020	72	T	S01 T01 D80 S03	S02
91	K021	72	T	S01 T01 D80 S03	S02
92	K022	72	T	S01 T01 D80 S03	S02
93	K023	72	T	S01 T01 D80 S03	S02
94	K024	72	T	S01 T01 D80 S03	S02
95	K025	72	T	S01 T01 D80 S03	S02
96	K026	72	T	S01 T01 D80 S03	S02
97	K027	72	T	S01 T01 D80 S03	S02
98	K028	72	T	S01 T01 D80 S03	S02
99	K029	72	T	S01 T01 D80 S03	S02
100	K030	72	T	S01 T01 D80 S03	S02
101	K031	72	T	S01 T01 D80 S03	S02
102	K032	72	T	S01 T01 D80 S03	S02
103	K033	72	T	S01 T01 D80 S03	S02
104	K034	72	T	S01 T01 D80 S03	S02
105	K035	72	T	S01 T01 D80 S03	S02
106	K036	72	T	S01 T01 D80 S03	S02
107	K037	72	T	S01 T01 D80 S03	S02
108	K038	72	T	S01 T01 D80 S03	S02
109	K039	72	T	S01 T01 D80 S03	S02
110	K040	72	T	S01 T01 D80 S03	S02
111	K041	72	T	S01 T01 D80 S03	S02
112	K042	72	T	S01 T01 D80 S03	S02
113	K043	72	T	S01 T01 D80 S03	S02
114	K044	49	T	S01 T01 D80 S03	S02
115	K045	49	T	S01 T01 D80 S03	S02
116	K046	156	T	S01 T01 D80 S03	S02
117	K047	49	T	S01 T01 D80 S03	S02
118	K048	93	T	S01 T01 D80 S03	S02
119	K049	93	T	S01 T01 D80 S03	S02
120	K050	248	T	S01 T01 D80 S03	S02
121	K051	101	T	S01 T01 D80 S03	S02
122	K052	93	T	S01 T01 D80 S03	S02
123	K060	72	T	S01 T01 D80 S03	S02
124	K061	2,278	T	S01 T01 D80 S03	S02
125	K062	604	T	S01 T01 D80 S03	S02
126	K069	2,552	T	S01 T01 D80 S03	S02
127	K071	72	T	S01 T01 D80 S03	S02
128	K073	72	T	S01 T01 D80 S03	S02
129	K083	72	T	S01 T01 D80 S03	S02
130	K084	23	T	S01 T01 D80 S03	S02
131	K085	72	T	S01 T01 D80 S03	S02
132	K086	72	T	S01 T01 D80 S03	S02
133	K087	81	T	S01 T01 D80 S03	S02
134	K088	72	T	S01 T01 D80 S03	S02
135	K090	49	T	S01 T01 D80 S03	S02
136	K091	72	T	S01 T01 D80 S03	S02
137	K093	49	T	S01 T01 D80 S03	S02
138	K094	49	T	S01 T01 D80 S03	S02
139	K095	49	T	S01 T01 D80 S03	S02
140	K096	49	T	S01 T01 D80 S03	S02
141	K097	49	T	S01 T01 D80 S03	S02
142	K098	49	T	S01 T01 D80 S03	S02
143	K099	49	T	S01 T01 D80 S03	S02
144	K100	49	T	S01 T01 D80 S03	S02
145	K101	49	T	S01 T01 D80 S03	S02
146	K102	49	T	S01 T01 D80 S03	S02
147	K103	49	T	S01 T01 D80 S03	S02
148	K104	49	T	S01 T01 D80 S03	S02

CONTINUATION FORM

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1)
149	K 1 0 7	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
150	K 1 0 8	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
151	K 1 0 9	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
152	K 1 1 0	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
153	K 1 1 1	72	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
154	K 1 1 2	72	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
155	K 1 1 3	72	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
156	K 1 1 4	72	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
157	K 1 1 5	72	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
158	K 1 1 6	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
159	K 1 1 7	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
160	K 1 1 8	72	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
161	K 1 2 3	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
162	K 1 2 4	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
163	K 1 2 5	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
164	K 1 2 6	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
165	K 1 3 1	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
166	K 1 3 2	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
167	K 1 3 6	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
168	K 1 4 1	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
169	K 1 4 2	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
170	K 1 4 3	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
171	K 1 4 4	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
172	K 1 4 5	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
173	K 1 4 7	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
174	K 1 4 8	50	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
175	K 1 4 9	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
176	K 1 5 0	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
177	K 1 5 1	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
178	K 1 5 6	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
179	K 1 5 7	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
180	K 1 5 8	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
181	K 1 5 9	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
182	K 1 6 1	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
183	K 1 6 9	180	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
184	K 1 7 0	71	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
185	K 1 7 1	339	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
186	K 1 7 2	271	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
187	K 1 7 4	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
188	K 1 7 5	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
189	K 1 7 6	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
190	K 1 7 7	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
191	K 1 7 8	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
192	K 1 8 1	49	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
193	P 0 0 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
194	P 0 0 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
195	P 0 0 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
196	P 0 0 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
197	P 0 0 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
198	P 0 0 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
199	P 0 0 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
200	P 0 0 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
201	P 0 0 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
202	P 0 1 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
203	P 0 1 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
204	P 0 1 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
205	P 0 1 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
206	P 0 1 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
207	P 0 1 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
208	P 0 1 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
209	P 0 1 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
210	P 0 1 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
211	P 0 2 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
212	P 0 2 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
213	P 0 2 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
214	P 0 2 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
215	P 0 2 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
216	P 0 2 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
217	P 0 2 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
218	P 0 2 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
219	P 0 2 9	556	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
220	P 0 3 0	556	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
221	P 0 3 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
222	P 0 3 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1)
223	p 0 3 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
224	P 0 3 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
225	p 0 3 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
226	p 0 3 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
227	p 0 3 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
228	p 0 4 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
229	p 0 4 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
230	p 0 4 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
231	p 0 4 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
232	p 0 4 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
233	p 0 4 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
234	p 0 4 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
235	p 0 4 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
236	p 0 4 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
237	p 0 4 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
238	p 0 5 0	52	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
239	p 0 5 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
240	p 0 5 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
241	p 0 5 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
242	p 0 5 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
243	p 0 5 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
244	p 0 5 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
245	p 0 6 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
246	p 0 6 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
247	p 0 6 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
248	p 0 6 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
249	P 0 6 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
250	p 0 6 6	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
251	p 0 6 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
252	p 0 6 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
253	p 0 6 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
254	p 0 7 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
255	p 0 7 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
256	p 0 7 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
257	p 0 7 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
258	p 0 7 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
259	p 0 7 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
260	p 0 7 6	35	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
261	p 0 7 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
262	p 0 7 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
263	p 0 8 1	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
264	p 0 8 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
265	p 0 8 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
266	p 0 8 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
267	p 0 8 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
268	p 0 8 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
269	p 0 8 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
270	p 0 9 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
271	p 0 9 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
272	p 0 9 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
273	P 0 9 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
274	p 0 9 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
275	p 0 9 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
276	p 0 9 8	556	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
277	p 0 9 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
278	p 1 0 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
279	p 1 0 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
280	p 1 0 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
281	p 1 0 4	556	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
282	p 1 0 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
283	p 1 0 6	556	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
284	p 1 0 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
285	p 1 0 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
286	p 1 1 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
287	p 1 1 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
288	p 1 1 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
289	p 1 1 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
290	p 1 1 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
291	p 1 1 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
292	p 1 1 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
293	p 1 1 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
294	p 1 1 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
295	p 1 2 0	25	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
296	p 1 2 1	638	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1)
297	p 1 2 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
298	p 1 2 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
299	p 1 2 7	30	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
300	p 1 2 8	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
301	p 1 8 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
302	p 1 8 8	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
303	p 1 8 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
304	p 1 9 0	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
305	p 1 9 1	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
306	p 1 9 2	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
307	p 1 9 4	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
308	p 1 9 6	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
309	p 1 9 7	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
310	p 1 9 8	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
311	p 1 9 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
312	p 2 0 1	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
313	p 2 0 2	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
314	p 2 0 3	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
315	p 2 0 4	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
316	p 2 0 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
317	U 0 0 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
318	U 0 0 2	137	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
319	U 0 0 3	116	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
320	U 0 0 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
321	U 0 0 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
322	U 0 0 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
323	U 0 0 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
324	U 0 0 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
325	U 0 0 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
326	U 0 1 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
327	U 0 1 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
328	U 0 1 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
329	U 0 1 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
330	U 0 1 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
331	U 0 1 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
332	U 0 1 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
333	U 0 1 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
334	U 0 1 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
335	U 0 2 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
336	U 0 2 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
337	U 0 2 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
338	U 0 2 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
339	U 0 2 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
340	U 0 2 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
341	U 0 2 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
342	U 0 2 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
343	U 0 2 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
344	U 0 2 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
345	U 0 3 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
346	U 0 3 1	32	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
347	U 0 3 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
348	U 0 3 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
349	U 0 3 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
350	U 0 3 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
351	U 0 3 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
352	U 0 3 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
353	U 0 3 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
354	U 0 3 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
355	U 0 4 1	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
356	U 0 4 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
357	U 0 4 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
358	U 0 4 4	103	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
359	U 0 4 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
360	U 0 4 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
361	U 0 4 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
362	U 0 4 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
363	U 0 4 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
364	U 0 5 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
365	U 0 5 1	105	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
366	U 0 5 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
367	U 0 5 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
368	U 0 5 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
369	U 0 5 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
370	U 0 5 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2

CONTINUATION FORM

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.			A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes														
									(1) Process Codes												(2) Process Description (if code is not entered in 7.D1)		
3	7	1	U	0	5	8	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	2	U	0	5	9	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	3	U	0	6	0	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	4	U	0	6	1	44	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	5	U	0	6	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	6	U	0	6	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	7	U	0	6	4	45	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	8	U	0	6	6	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	7	9	U	0	6	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	0	U	0	6	8	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	1	U	0	6	9	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	2	U	0	7	0	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	3	U	0	7	1	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	4	U	0	7	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	5	U	0	7	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	6	U	0	7	4	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	7	U	0	7	5	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	8	U	0	7	6	44	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	8	9	U	0	7	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	0	U	0	7	8	44	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	1	U	0	7	9	26	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	2	U	0	8	0	136	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	3	U	0	8	1	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	4	U	0	8	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	5	U	0	8	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	6	U	0	8	4	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	7	U	0	8	5	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	8	U	0	8	6	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
3	9	9	U	0	8	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	0	U	0	8	8	32	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	1	U	0	8	9	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	2	U	0	9	0	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	3	U	0	9	1	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	4	U	0	9	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	5	U	0	9	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	6	U	0	9	4	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	7	U	0	9	5	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	8	U	0	9	6	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	0	9	U	0	9	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	0	U	0	9	8	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	1	U	0	9	9	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	2	U	1	0	1	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	3	U	1	0	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	4	U	1	0	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	5	U	1	0	5	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	6	U	1	0	6	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	7	U	1	0	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	8	U	1	0	8	44	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	1	9	U	1	0	9	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	0	U	1	1	0	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	1	U	1	1	1	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	2	U	1	1	2	115	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	3	U	1	1	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	4	U	1	1	4	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	5	U	1	1	5	1	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	6	U	1	1	6	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	7	U	1	1	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	2	8	U	1	1	8	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
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4	3	0	U	1	2	0	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	1	U	1	2	1	44	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	2	U	1	2	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	3	U	1	2	3	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	4	U	1	2	4	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	5	U	1	2	5	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	6	U	1	2	6	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	7	U	1	2	7	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	8	U	1	2	8	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	3	9	U	1	2	9	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
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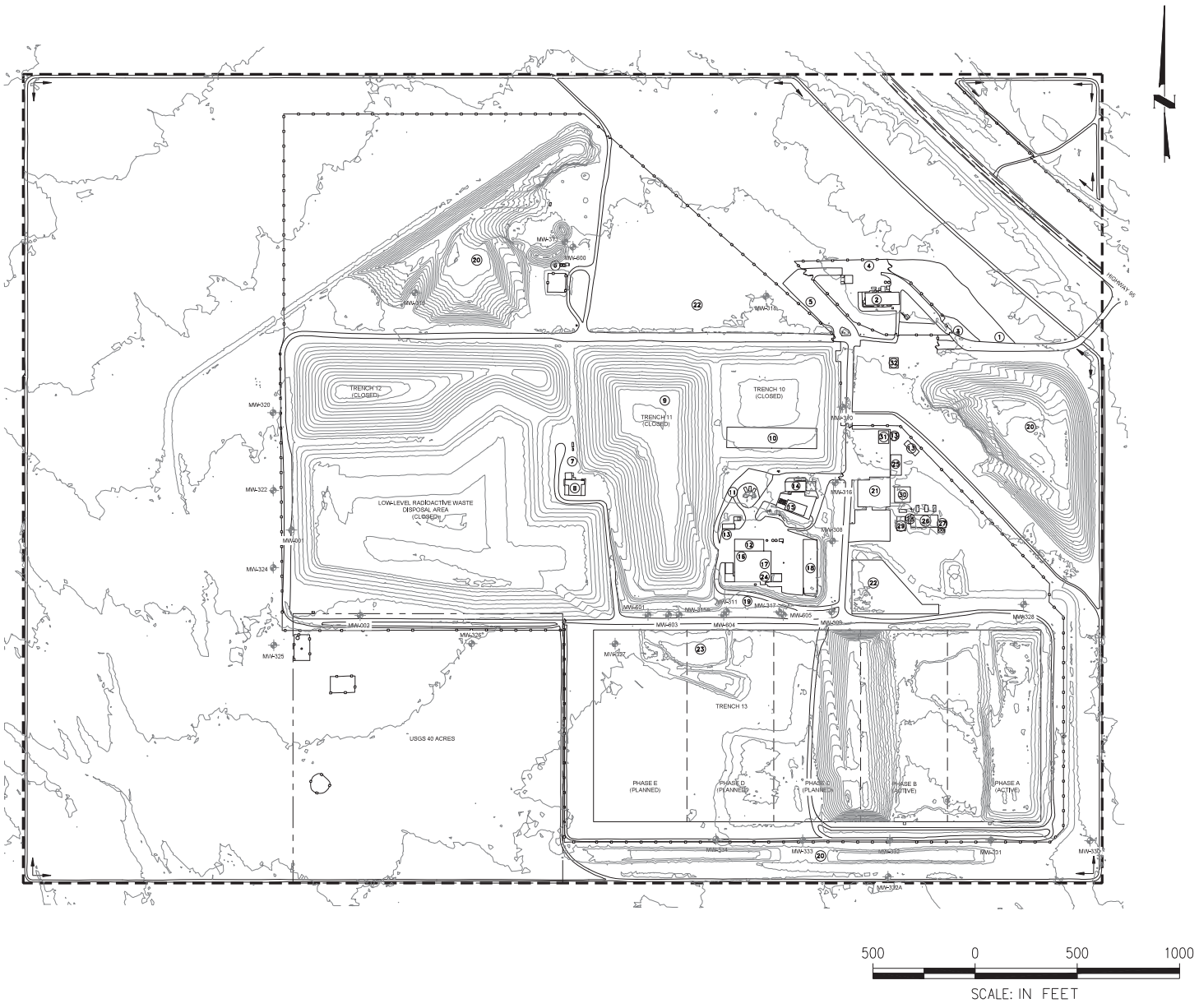
4	4	1	U	1	3	1	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	4	2	U	1	3	2	23	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	4	3	U	1	3	3	1	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2
4	4	4	U	1	3	4	1,987	T	S	0	1	T	0	1	D	8	0	S	0	3	S	0	2

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1)
445	U135	23	T	S01 T01 D80 S03	S02
446	U136	23	T	S01 T01 D80 S03	S02
447	U137	23	T	S01 T01 D80 S03	S02
448	U138	23	T	S01 T01 D80 S03	S02
449	U139	23	T	S01 T01 D80 S03	S02
450	U140	32	T	S01 T01 D80 S03	S02
451	U141	23	T	S01 T01 D80 S03	S02
452	U142	23	T	S01 T01 D80 S03	S02
453	U143	23	T	S01 T01 D80 S03	S02
454	U144	24	T	S01 T01 D80 S03	S02
455	U145	23	T	S01 T01 D80 S03	S02
456	U146	23	T	S01 T01 D80 S03	S02
457	U147	23	T	S01 T01 D80 S03	S02
458	U148	23	T	S01 T01 D80 S03	S02
459	U149	23	T	S01 T01 D80 S03	S02
460	U150	23	T	S01 T01 D80 S03	S02
461	U151	23	T	S01 T01 D80 S03	S02
462	U152	64	T	S01 T01 D80 S03	S02
463	U153	23	T	S01 T01 D80 S03	S02
464	U154	23	T	S01 T01 D80 S03	S02
465	U155	147	T	S01 T01 D80 S03	S02
466	U156	23	T	S01 T01 D80 S03	S02
467	U157	23	T	S01 T01 D80 S03	S02
468	U158	23	T	S01 T01 D80 S03	S02
469	U159	23	T	S01 T01 D80 S03	S02
470	U160	34	T	S01 T01 D80 S03	S02
471	U161	23	T	S01 T01 D80 S03	S02
472	U162	32	T	S01 T01 D80 S03	S02
473	U163	23	T	S01 T01 D80 S03	S02
474	U164	1	T	S01 T01 D80 S03	S02
475	U165	23	T	S01 T01 D80 S03	S02
476	U166	32	T	S01 T01 D80 S03	S02
477	U167	23	T	S01 T01 D80 S03	S02
478	U168	23	T	S01 T01 D80 S03	S02
479	U169	23	T	S01 T01 D80 S03	S02
480	U170	23	T	S01 T01 D80 S03	S02
481	U171	23	T	S01 T01 D80 S03	S02
482	U172	23	T	S01 T01 D80 S03	S02
483	U173	23	T	S01 T01 D80 S03	S02
484	U174	23	T	S01 T01 D80 S03	S02
485	U175	23	T	S01 T01 D80 S03	S02
486	U176	23	T	S01 T01 D80 S03	S02
487	U177	23	T	S01 T01 D80 S03	S02
488	U178	23	T	S01 T01 D80 S03	S02
489	U179	23	T	S01 T01 D80 S03	S02
490	U180	23	T	S01 T01 D80 S03	S02
491	U181	23	T	S01 T01 D80 S03	S02
492	U182	23	T	S01 T01 D80 S03	S02
493	U183	23	T	S01 T01 D80 S03	S02
494	U184	23	T	S01 T01 D80 S03	S02
495	U185	23	T	S01 T01 D80 S03	S02
496	U186	23	T	S01 T01 D80 S03	S02
497	U187	23	T	S01 T01 D80 S03	S02
498	U188	23	T	S01 T01 D80 S03	S02
499	U189	23	T	S01 T01 D80 S03	S02
4100	U190	23	T	S01 T01 D80 S03	S02
4101	U191	23	T	S01 T01 D80 S03	S02
4102	U192	23	T	S01 T01 D80 S03	S02
4103	U193	23	T	S01 T01 D80 S03	S02
4104	U194	23	T	S01 T01 D80 S03	S02
4105	U195	23	T	S01 T01 D80 S03	S02
4106	U196	23	T	S01 T01 D80 S03	S02
4107	U197	23	T	S01 T01 D80 S03	S02
4108	U198	23	T	S01 T01 D80 S03	S02
4109	U199	23	T	S01 T01 D80 S03	S02
4110	U200	23	T	S01 T01 D80 S03	S02
4111	U201	23	T	S01 T01 D80 S03	S02
4112	U202	23	T	S01 T01 D80 S03	S02
4113	U203	23	T	S01 T01 D80 S03	S02
4114	U204	23	T	S01 T01 D80 S03	S02
4115	U205	23	T	S01 T01 D80 S03	S02
4116	U206	44	T	S01 T01 D80 S03	S02
4117	U207	23	T	S01 T01 D80 S03	S02
4118	U208	23	T	S01 T01 D80 S03	S02
4119	U209	32	T	S01 T01 D80 S03	S02
4120	U210	23	T	S01 T01 D80 S03	S02
4121	U211	23	T	S01 T01 D80 S03	S02
5002	U212	23	T	S01 T01 D80 S03	S02
5003	U213	23	T	S01 T01 D80 S03	S02
5004	U214	23	T	S01 T01 D80 S03	S02
5006	U215	23	T	S01 T01 D80 S03	S02
5007	U216	23	T	S01 T01 D80 S03	S02
5008	U217	23	T	S01 T01 D80 S03	S02
5009	U218	23	T	S01 T01 D80 S03	S02
5010	U219	23	T	S01 T01 D80 S03	S02
5011	U220	23	T	S01 T01 D80 S03	S02
5012	U221	23	T	S01 T01 D80 S03	S02
5013	U222	23	T	S01 T01 D80 S03	S02
5014	U223	23	T	S01 T01 D80 S03	S02
5015	U225	23	T	S01 T01 D80 S03	S02
5016	U226	23	T	S01 T01 D80 S03	S02
5017	U227	23	T	S01 T01 D80 S03	S02
5018	U228	23	T	S01 T01 D80 S03	S02

CONTINUATION FORM

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))					
Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes (1) Process Codes	D. Processes (2) Process Description (if code is not entered in 7.D1)
5 1 9	U 2 1 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 0	U 2 1 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 1	U 2 1 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 2	U 2 1 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 3	U 2 2 0	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 4	U 2 2 1	1,199	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 5	U 2 2 2	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 6	U 2 2 3	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 7	U 2 2 5	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 8	U 2 2 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 2 9	U 2 2 7	190	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 0	U 2 2 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 1	U 2 3 4	47	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 2	U 2 3 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 3	U 2 3 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 4	U 2 3 7	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 5	U 2 3 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 6	U 2 3 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 7	U 2 4 0	58	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 8	U 2 4 3	54	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 3 9	U 2 4 4	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 0	U 2 4 6	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 1	U 2 4 7	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 2	U 2 4 8	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 3	U 2 4 9	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 4	U 2 7 1	82	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 5	U 2 7 8	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 6	U 2 7 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 7	U 2 8 0	29	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 8	U 2 2 8	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 4 9	U 2 5 3	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 0	U 3 5 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 1	U 3 6 4	23	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 2	U 3 6 7	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 3	U 3 7 2	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 4	U 3 7 3	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 5	U 3 8 7	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 6	U 3 8 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 7	U 3 9 4	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 8	U 3 9 5	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 5 9	U 3 0 4	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 6 0	U 3 0 9	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 6 1	U 4 1 0	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2
5 6 2	U 4 1 1	1	T	S 0 1 T 0 1 D 8 0 S 0 3	S 0 2



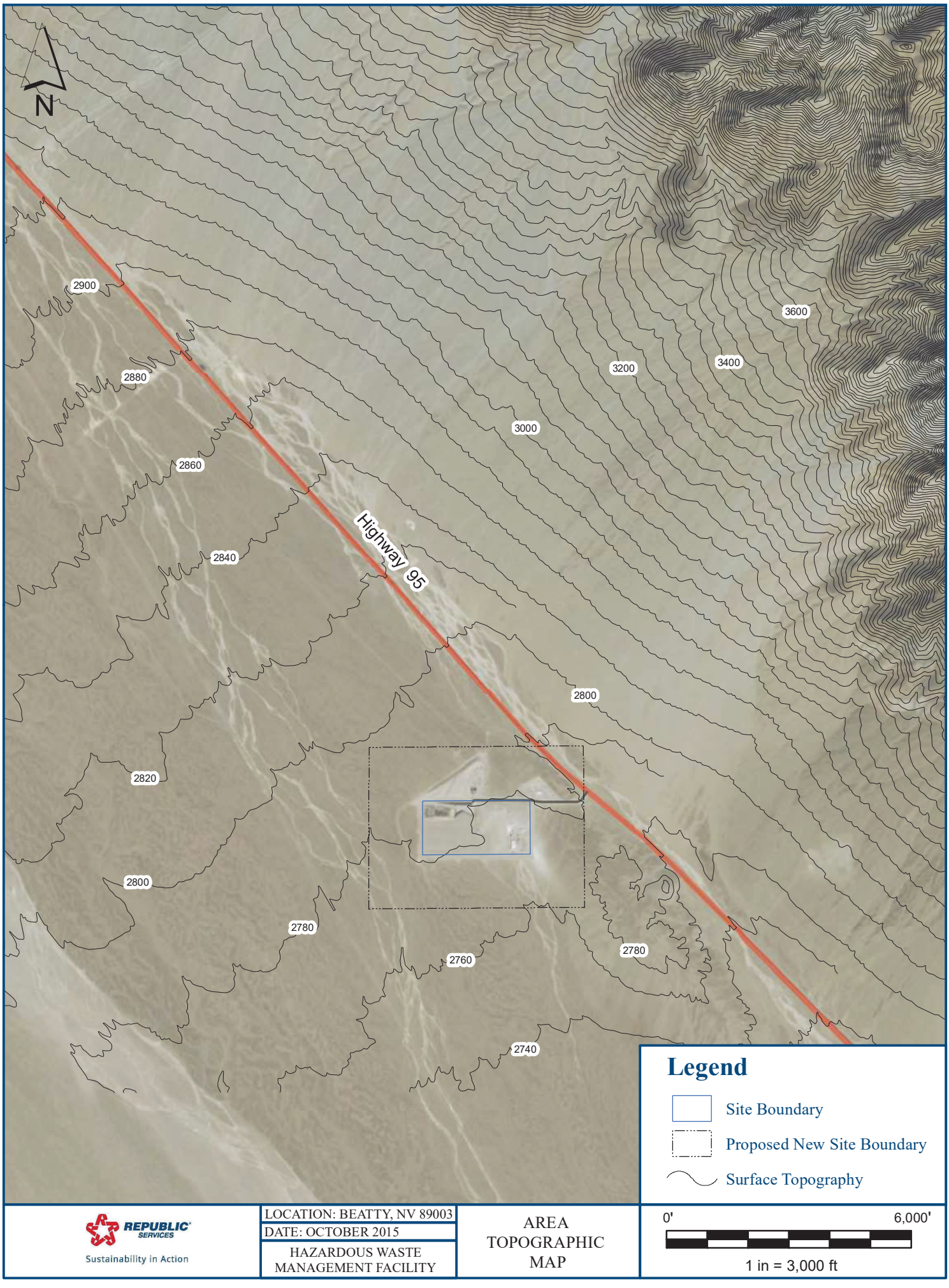
LEGEND

1. MAIN SITE ENTRANCE
2. ADMINISTRATION OFFICE AND MAIN LABORATORY
3. SECURITY AND DRIVERS TRAILER
4. INBOUND AND OUTBOUND SCALES
5. TRUCK SAMPLING STATION
6. WATER STORAGE
7. FUEL STORAGE
8. MAINTENANCE SHOP
9. WEATHER STATION AND TRENCH 11 LYSIMETER
10. DRY HAZARDOUS WASTE STORAGE AREA 3
11. OUTDOOR STABILIZATION
12. BIN STORAGE AREA
13. OPERATIONS OFFICE
14. PCB PROCESSING/DEA STORAGE AREA AND PCB TANK FARM
15. AEROSOL RECYCLING AREA
16. CONTAINER MANAGEMENT AND STORAGE BUILDING 1
17. STABILIZATION BUILDING 1
18. DRY HAZARDOUS WASTE STORAGE AREA 2
19. DECONTAMINATION PAD AND EVAPORATION TANK
20. SOIL STOCKPILE
21. CONTAINER MANAGEMENT AND STORAGE BUILDING 2 AND OFFICE TRAILER
22. TRUCK STAGING AREA
23. CLAY REAGENT STORAGE
24. SATELLITE LABORATORY 1
25. DRUM RE-USE MANAGEMENT AREA
26. STABILIZATION BUILDING 2
27. WASTE STAGING PAD
28. SATELLITE LABORATORY 2
29. TREATMENT/NEUTRALIZATION TANK FARM
30. DRY HAZARDOUS WASTE STORAGE AREA 4
31. DRUM STAGING
32. CHANGING ROOM

- PROPERTY LINE
- SECURITY FENCE
- ACCESS GATE
- INTERNAL ROADWAYS
- USGS 40 ACRES
- MAJOR CONTOUR (5 FEET)
- TORTOISE FENCE
- MONITORING WELL (MW-308)

RCRA PERMIT RENEWAL APPLICATION	01/23/25	REPUBLIC SERVICES Sustainability in Action
FACILITY FEATURES		HAZARDOUS WASTE MANAGEMENT FACILITY BEATTY, NEVADA
		AquAeTer optimizing resources | water, air, earth

DRAWN BY	DATE	DESIGNED BY	DATE
GDM	01/23/25	CAB	01/23/25



REPUBLIC SERVICES
Sustainability in Action

LOCATION: BEATTY, NV 89003
DATE: OCTOBER 2015
HAZARDOUS WASTE MANAGEMENT FACILITY

AREA TOPOGRAPHIC MAP

Photo 1- Security Office, Staffed 24/7, view to the northwest.

Photo 2- Administration Building, view to the northwest.

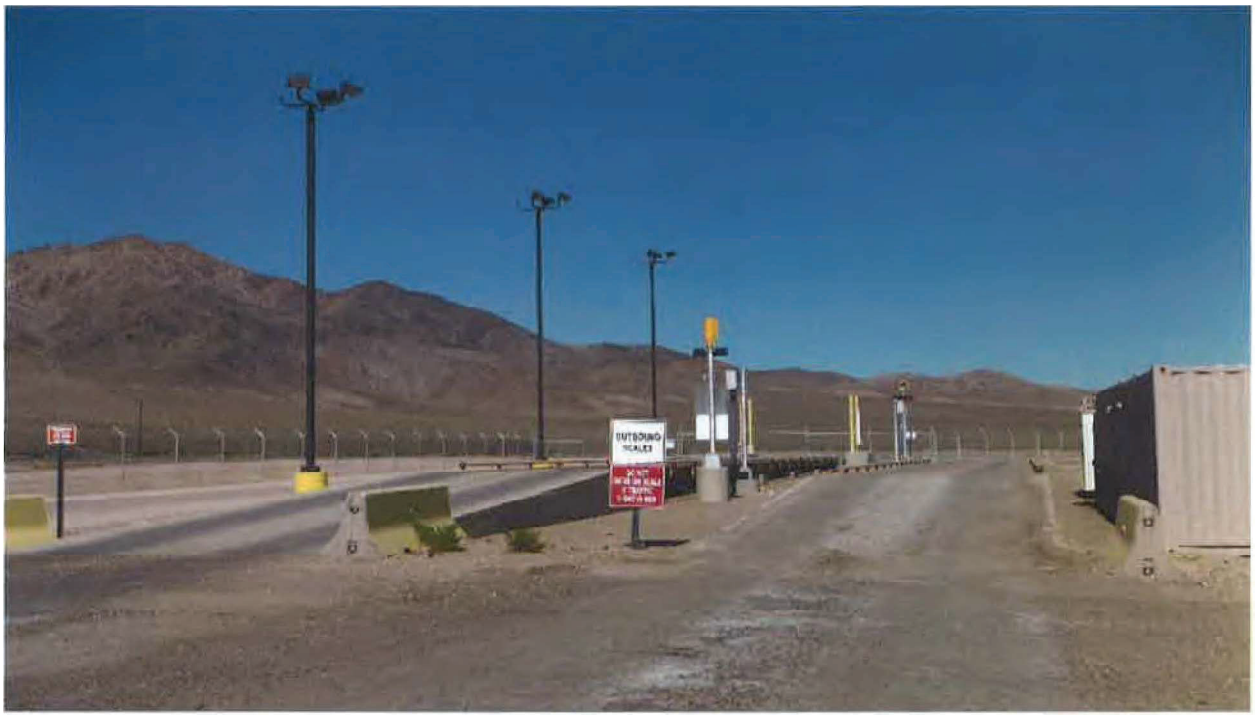


Photo 3- Scales by Administration Building, view to the east.

Photo 4: Observation and sample rack, view to the southeast.

Photo 5- Lysimeter and weather station, on Trench 11, view to the north.

Photo 6- Maintenance Shop, view to the west.

Photo 7- Dry Hazardous Waste Storage Area 2, view to the north, bounded by yellow posts, view to the north.

Photo 8- Dry Hazardous Waste Storage Area 3, with the black roll-off bins, bounded by yellow posts. Reagent storage is on the left and right, view to the east.

Photo 9- PCB/RCRA Processing and DEA Storage Building (CMU-1), view to the southeast.

Photo 10- PCB Oil Tank Farm (Tanks 4, 5, 6, and 7), on west side of the PCB/RCRA Processing and DEA Storage Building (CMU-1).

Photo 11- Container Management and Storage Building 1 (CMU-16), view from the north.

Photo 12- Container Management and Storage Building 1 (CMU-16), view from the west.

Photo 13- Tanks 2 and 3, aka Treatment Pans 2 and 3, view to the southeast.

Photo 14- Tanks 2 and 3, aka Treatment Pans 2 and 3, view to the northwest.

Photo 15- Tanks 18 and 19, aka Treatment Pans 4 and 5, with dust control baghouse in the middle. An unloading dock to Container Management Building 1 is on the left.

Photo 16- Tank 11, Decontamination/Evaporation pad and tank.

Photo 17- View of the northwest side of Closed Trench 11.

Photo 18: View of southwest portion of Closed Trench 12.

Photo 19- Trench 13 Phase A and B looking east.

Photo 20- Trench 13 Phase A and B looking south.

Photo 21- Water well and pond, view to the southeast.

Photo 22- Aerosol Recycling Operation Area, view to the southwest.

Photo 23- Aerosol Recycling Operation Area and Propane Tank Farm, view to the east.

Photo 26- DEA Storage Cage located inside the PCB/RCRA Processing and DEA Storage Building (CMU-1).

Photo 27- Container Management and Storage Building 2 (CMU-19), looking south.

Photo 28- Stabilization Building 2 and Tanks 22, 23, and 24, looking north.

Photo 29- Waste Staging Pad (WP-1), looking west.

Photo 30- Treatment Tanks including Tanks 26, 27, 28, and 29, looking northeast.

Photo 31- Satellite Laboratory 2 (CMU-21) and Laboratory Rinse Water Tank 25. Tank 25 is in a vault underneath the canopy. View to the north.

Photo 32- Drum Reuse Area, looking east.

Photo 33- Drum and Tote Storage, looking north.

Photo 34- Maintenance Building 2 under construction, looking north.

List of Wastes Restricted from Management at USEN

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

1. Waste that is not identified as "permitted" or is described as "prohibited" in the other sections of this Permit or in the RCRA Permit Application.
2. Any radioactive material that is not exempt from regulation and licensing or is not expressly authorized for storage, treatment or disposal under this Permit; or any radioactive or nuclear waste material, which requires specific licensing or permitting under any other rules of state or federal authorities for disposal or transshipment;
3. Compressed or pressurized gases which are a hazardous waste (not to include retail aerosol containers, retail propane/butane cylinders of 50 gallons or less, or automotive struts);
4. Class 1, Division 1.1 or 1.2, or forbidden explosives (49 CFR Part 173.50), or any explosive material, as defined by USDOT under 49 CFR Part 173;
5. Biological Agents, Etiologic Agents or infectious wastes;
6. Bulk liquids for direct disposal, or containerized liquids (except for lab packs) for direct disposal; or bulk hazardous liquids to which absorbents have been added (use of liquids as dust suppression in accordance with Section 10.8.10 of the Part B Permit Application is not considered disposal under this section);
7. Reactive material, as defined in 40 CFR Part 261.23, that is not treated to meet the requirements of 40 CFR Part 268 prior to disposal;
8. Liquid organic peroxides with concentration exceeding 5% by volume (not to include DOT Generic Types of G, F and E as identified in associated SDSs or by 40 CFR 173.128(c));
9. Containerized liquids (Lab packs) with biodegradable absorbents (40 CFR 264.316(b)); nor
10. Wastes containing VOC concentrations >500 ppmw for treatment onsite.

List of Other Activities Authorized at USEN

1. Collected leachate may be used for dust suppression within the same cell from which it was generated, provided the collected leachate never leaves the landfill in accordance with Permit Condition 7.3.4. [*See EPA memo dated May 23, 1996*]

2. The Permittee may stage interim process loads while awaiting verification testing, in accordance with Sections 7.7.4 and 10.8.8 of the Part B Permit Application, but this practice must cease by December 31, 2029. [*See Permit Condition 7.11.1*]

The following documents are adopted herein as if fully set forth in this permit:

1. Trench 12 Design Report Volumes 1 and 2 – March 1996
2. Response to Notice of Deficiency for the Trench 12 Design Report – December 1996
3. Corrective Measures Study Report for US Ecology, Inc. HWMF – April 1997
4. Landfill Report for Trench-12 – Supplement, – October 2007
5. Design Basis and Construction Specifications for Trenches 11 and 12 Final Covers – April 2008
6. Desert Tortoise Survey Report – US Ecology Buffer Area, Ny County, Nevada. Prepared by JBR Environmental Consultants, Inc. September 28, 2009.
7. Final Cover Performance Monitoring System and Protocol, Disposal Trenches 11 and 12 – November 2009, revised January 2010
8. US Department of the Interior Fish and Wildlife Service. Letter Report. Subject: Species List for US Ecology Nevada Facility Site Assessment. October 18, 2010. File No. 84320-2010-SL-0467.
9. Landfill Engineering Report Trench 13, Volumes 1 and 2 – March 2016
10. The US Ecology, Beatty, Nevada Part A & B Permit Applications – dated February 2025, and subsequent revisions.