



List of Proposed Revisions to Part 9 and Attachment G

Testimony-Section III.E

1. Closure Plan Sections 5.3.2 and 6.1 regarding Decontamination and Sampling Height (Attachments G.1, G.4, G.18, G.19, G.20, G.21, G.22, and G.24)

Attachment G.1

5.3.2 Decontamination of Structures and Related Equipment

Including the height of pallets that may have been used, two stacked 55-gallon drums measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

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Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

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6.1 Decontamination Verification Sampling Activities

In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the walls (up to 11 feet) of the permitted unit.

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Attachment G.4

5.3.2 Decontamination of Structures and Related Equipment

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are not stacked. Including the height of a pallet, a 55-gallon drum measures just over four feet high. To ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of seven feet.

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Ceilings of the permitted unit, walls above seven feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic hazardous waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above seven feet.

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6.1 Decontamination Verification Sampling Activities

In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one verification wipe sample from the floor and from the walls (up to seven feet) of the permitted unit.

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Attachment G.18

5.3.2 Decontamination of Structures and Related Equipment



The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

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Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

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6.1 Decontamination Verification Sampling Activities

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from each wall (up to 11 feet) of the permitted unit.

Attachment G.19

5.3.2 Decontamination of Structures and Related Equipment

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

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Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the unit that could have affected the ceiling or the walls above 11 feet.

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6.1 Decontamination Verification Sampling Activities

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from each wall (up to 11 feet) of the permitted unit.

Attachment G.20

5.3.2 Decontamination of Structures and Related Equipment

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

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Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

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6.1 Decontamination Verification Sampling Activities

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the wall (up to 11 feet) of the permitted unit.

Attachment G.21

5.3.2 Decontamination of Structures and Related Equipment

The entirety of the unit's floor will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that decontamination of the wall is conducted to a sufficient height, it will be decontaminated to a height of 11 feet.

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Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some indication of contamination, the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

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6.1 Decontamination Verification Sampling Activities

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the wall of the permitted unit.

Attachment G.22

5.3.2 Decontamination of Structures and Related Equipment

The entirety of the unit's floors will be decontaminated. To ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet. Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile and semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

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6.1 ~~Decontamination Verification Sampling Activities~~

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In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least 18 wipe samples; eight wipe samples from the floor, one from each of the shorter walls (up to 11 feet), and four from each of the longer walls (up to 11 feet).

Attachment G.24

Decontamination of Structures and Related Equipment

Decontamination of the surfaces of the permitted unit will include all features located directly below the unit. If a hazardous waste spill or release has occurred at the permitted unit, decontamination will be expanded to include all impacted surfaces within the room. The entirety of the unit's floors will be decontaminated. Walls up to 11 feet will be decontaminated; ceilings and walls above 11 feet will be presumed to be free of contamination unless there is some indication of contamination or a spill or release occurred that could have affected high on the walls or on the ceiling. Equipment and surfaces within the permitted unit will also be decontaminated.

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~~Decontamination Verification Sampling Activities~~

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In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the walls (up to 11 feet) of the permitted unit.

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2. Permit Section 9.4.4.1 Regarding the Possibility of Other Sampling Types

9.4.4.1 ~~Decontamination Verification and Soil Sampling Activities~~

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Wipe, chip, and liquid sampling shall be used, as appropriate, to verify the absence of hazardous constituents after decontamination of surfaces, structures, and related equipment at indoor and outdoor permitted units. Samples shall be analyzed for metals, SVOCs, and polychlorinated biphenyls (PCBs). Decontamination shall be considered verified and the clean closure performance standards in Permit Section 9.2.1 achieved when samples have hazardous constituent concentrations that are less than the detection limits for the analytical methods in the approved unit-specific closure plan.

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3. Permit Section 9.4.7.1.i Regarding the Removal of the Term "wipe" from the Title and the Addition of the Different Sampling Types in the Text

9.4.7.1.i ~~Decontamination Verification Sampling Grid for Indoor Units or Structures~~

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The Permittees shall collect one verification sample, wipe or chip samples as appropriate and as described in Section 9.4.4.1, every 250 square feet or less in loading and unloading zones and one verification sample every 900 square feet or less on floors, walls (up to 11 feet from the floor, or another height approved by the Department), and ceilings (lower than 11 feet high, or another height approved by the Department).

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4. Proposed Language for Permit Sections 9.4.7.1.ii & Permit Section 9.4.7.1.ii.a

9.4.7.1.ii Soil Sampling Requirements for Outdoor Storage Units

The Permittees shall collect soil samples from the soils below the sub-grade, from the soils beneath the pad at the interface of fill and native soil or tuff, and ~~from the following~~ locations at the outdoor storage units:

- (1) One sample for every 250 square feet in loading and unloading zones;
 - (2) One sample for every 900 square feet under the pad;
 - (3) One sample at each discharge point (storm water run-off locations);
 - (4) One sample at the discharge point of any underground piping;
 - (5) One sample directly beneath all sumps and catch basins;
 - (6) One sample at all secondary containment areas;
 - (7) One sample at all joints and intersections of piping; and
 - (8) One sample every 30 feet beneath the axis of the lowest portions of any open conveyance drainage system in any permitted unit that has sloped flooring
- (see 40 CFR § 270.32(b)).

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9.4.7.1.ii.a Outdoor Storage Units¶
The Permittees shall collect soil samples at the following locations

Closure Plan Section 6.1 (Attachments G.5 through G.15, G.17 and G.26)

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Section 6.1

In compliance with Permit Section 9.4.7.1.ii, ~~this closure plan will ensure the collection of soil samples in the following locations:~~

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- a. one soil sample in front of the transportainer (491) (see Permit Section 9.4.7.1.ii(1));
- b. one soil sample every 900 square feet of the permitted unit for a total of 68 samples (see Permit Section 9.4.7.1.ii(2)); and
- c. three soil samples to address stormwater runoff (see Permit Section 9.4.7.1.ii(3) and discussion below for rationale of sample locations).

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Testimony-Section V.A

1. Closure Plans - Section 4.1

4.1 CLOSURE PERFORMANCE STANDARDS

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; ~~and~~
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

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~~If the Permittees are unable to achieve either of the clean closure standards above, they must:~~

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- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of 10⁻⁵ for carcinogenic

substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5...

2. Closure Plan - Section 4.2

Attachment G.1

~~Decontamination verification sampling, and soil sampling, if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.~~

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Attachment G.4

~~Decontamination verification sampling activities will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.~~

Attachments G.5, G.6, G.7, G.8, G.9, G.10, G.11, G.12, G.13, G.14, G.15, and G.16

~~Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.~~

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Attachment G.17

~~Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, structures, surfaces, and related equipment, at the permitted unit meet the closure performance standards in Permit Section 9.2.~~

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Attachments G.18, G.19, G.20, G.21, G.22, G.23, G.24, and G.25

~~Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.~~

Attachments G.26

~~After decontamination, soil sampling and decontamination verification sampling will be conducted to demonstrate that media and related equipment at the permitted unit meet the performance standards in Permit Section 9.2.~~

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3. Closure Plan Table Regarding Closure Schedule

Activity	Maximum Time Required
Notify the Department of intent to close	-45 Days
Final receipt of waste	Day 0
Complete waste removal	Day 90
Complete records review and structural assessment	<u>10 days after completed waste removal or 100 days after final receipt of waste</u>
Complete all closure activities and submit final closure certification report to the Department	Day 180

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4. Closure Plan Table Regarding Potential Radioactive Waste and its Disposal

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	<u>Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog.</u>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	<u>Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog.</u>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle

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Potential Waste Materials	Waste Types	Disposal Options
		C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	<u>Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog.</u>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	<u>Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog.</u>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	<u>Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog.</u>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

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5. Closure Plan Sections 5.3 and 5.3.1 - Editorial Changes

5.3 Decontamination and Removal of Structures and Related Equipment

In accordance with Permit Section 9.4.3, the unit's surfaces, and related equipment will be decontaminated, or removed, or both and managed according to Section 7.0 of this closure plan. Decontamination activities will ensure the removal of all waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards in Section 4.1.

All surfaces and related equipment that are removed and not intended for recycle will not require decontamination, will be considered solid and potentially hazardous waste when removed, and will be disposed of in accordance with Section 7.0.

5.3.1 Removal of Structures and Related Equipment

The following structures and related equipment will be removed after the structural assessment: the two room enclosures within Room 9010; and the chain-link fence that runs along the side of 9020.

Deleted: All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

Testimony-Section V.B

1. Proposed changes to Attachment G.13 (TA-54 Area G Shed 8)

5.3.2 Decontamination of Surfaces, Structures, and Related Equipment

At this time, there is no equipment located at the permitted unit that is expected to be left in place; however, if equipment is identified during the assessment that is expected to be left in place, it will be decontaminated.

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6.1 Soil Sampling and Decontamination Verification Sampling Activities

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces, related equipment, and soils at the permitted unit meet the closure performance standards in Permit Section 9.2.

Deleted: Decontamination of the permitted unit will be conducted by first removing loose material through sweeping then by steam cleaning or pressure washing with a solution consisting of a surfactant detergent (e.g., Alconox®) and water and mixed in accordance with the manufacturer's recommendations. Decontamination of the interior surfaces of the permitted unit will include all features located within the unit. ¶

One wipe sample will be collected from each piece of decontaminated equipment.

If there is liquid found in the sump at the time of the assessment, at least one liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

The entirety of the unit's floor will be decontaminated. Waste at the permitted unit is no longer stacked; however, past activities have allowed the stacking of 55-gallon drums. Including the height of any pallets that may have been used, two stacked 55-gallon drums measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of ten feet. Section 5.3.1 above says that the r ... [1]

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of four soil samples at the permitted unit from the following locations:

- a. immediately off the concrete pad in front of each roll-up door (see Permit Section 9.4.7.1.ii(1));
- b. every 900 square feet beneath the permitted unit after it, and the concrete pad, are removed (see Permit Section 9.4.7.1.ii(2)); and
- c. one sample directly beneath the location of where the sump was located (see Permit Section 9.4.7.1.ii(5)).

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2. Section 5.3.2 of Attachments G.1, G.18, G.19, G.20, G.21, G.22, G.23, and G.24

G.1 and G.24

5.3.2 Decontamination of Structures and Related Equipment

All surfaces, structures, and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's surfaces will include all features located within the unit (e.g., walls, railings, stairways, ramps).

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Attachments G.1, G.18, G.19, G.20, G.21, G.22, G.23, and G.24

5.3.2 Decontamination of Structures and Related Equipment

Decontamination of the permitted unit will be conducted by first removing loose material (e.g., dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a surfactant detergent (e.g., Alconox®) and water mixed in accordance with the manufacturer's recommendations rather than steam cleaning or pressure washing.

Deleted: Reducing the materials and equipment that are brought into the area to perform closure activities reduces the amount of low level radiological waste and waste wash solution generated. Reusable equipment that is decontaminated will have to be free of radiological and hazardous waste contamination before it can leave the permitted unit.

Attachments G.18, G.19, G.20, G.21, G.22, and G.23

5.3.2 Decontamination of Structures and Related Equipment

Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement.

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Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

3. Section 6.1 - Header and text:

Attachments G.1, G.4, G.16, G.18, G.20, G.21, G.22, G.23, G.24, and G.25

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6.1 Decontamination Verification Sampling Activities

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

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Attachment G.19

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6.1 Decontamination Verification Sampling Activities

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Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

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Attachments G.6, G.8, G.12, G.13, G.14, and G.15

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6.1 Soil Sampling and Decontamination Verification Sampling Activities

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

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Attachment G.10

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6.1 Soil Sampling and Decontamination Verification Sampling Activities

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

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4. Section 6.1 Regarding Potential for Chip or Liquid Sample Collection

Attachments G.1, G.4, G.18, G.19, G.20, G.21, G.22, G.23, G.24, G.25

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Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

Attachment G.8

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If there is liquid found in the sump in Dome 224 at the time of the assessment a liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

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5. Section 6.1 Regarding Sample Collection “at time of the assessment”

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Attachments G.1 and G.4

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If there is liquid found in the drain at the time of the assessment liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

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Attachment G.10

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If liquid is present in any of the drains, sumps, or piping at the time of the assessment, a liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

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Attachment G.12

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If liquid is present in any of the drains or piping at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

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Attachment G.13

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If there is liquid found in the sump at the time of the assessment, at least one liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

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Attachment G.14

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If there is liquid found in the trench drains or the dome sump at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

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Attachment G.15

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If there is liquid found in any of the 12 sumps, the double-walled holding tank, or the piping system at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

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Attachment G.16

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If liquid is found in the sump in the High Bay at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

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6. Section 5.3.2 of Attachments G.1, G.4, and G.16 Regarding “Before” Decontamination

Attachment G.1

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5.3.2 Decontamination Verification Sampling Activities

The floor drain in Room 9020 will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the drain located on the floor.

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Attachment G.4

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5.3.2 Decontamination Verification Sampling Activities

The floor drains in Rooms 102 and 103 will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the firewater drains located on the floor.

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Attachment G.16

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5.3.2 Decontamination Verification Sampling Activities

The floor drains in the High Bay will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the firewater drains located on the floor.

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7. Attachment G.10 Regarding Two Storage Sheds

2.0 DESCRIPTION OF UNIT TO BE CLOSED

Four domes (Domes 229, 230, 231, 232), one transportainer (362), and two storage sheds (484 & 574) are situated on it (see Figure G.10-1). The two storage sheds are not used for the storage of hazardous waste.

5.3.1 Removal of Structures and Related Equipment

The PermaCon® and the tensioned-fabric membranes on the domes (as well as the aluminum beams, trusses, and ancillary equipment supporting the domes) will be removed before the assessment.

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5.3.2 Decontamination of Equipment

This includes: the transportainer; the portable air monitors; all electronic devices and tools; and the spill cleanup equipment containers from within the domes (see Table G.10-6).

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8. Attachment G.8 Regarding 8 Storage Sheds

5.3.1 Removal of Structures and Related Equipment

The following structures and related equipment will be removed before the assessment: the tensioned-fabric membranes on the dome structures and the aluminum beams, trusses, and ancillary equipment supporting the domes. The asphalt pad, the materials associated with the asphalt pad (e.g., concrete ringwall, sump structures, and any HDPE liners), and a minimum of six inches of the base course and soil underlying the asphalt pad shall be removed after the assessment.

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9. Proposed language Change for Attachment G.16 Regarding Slide Gate Valve

2.0 DESCRIPTION OF UNIT TO BE CLOSED

A truck ramp, which is not part of the Loading Dock CSA, runs perpendicular to the loading dock platform. At the bottom of the truck ramp is a 38-inch-square grate covering a drainage culvert. The Loading Dock container storage area is divided into two areas on the platform; the first is an area at the north end of the loading dock which measures 16 ft by ten (10) ft. and the second area is at the south end of the loading dock which measures 16 ft by 12 ft. Waste drums of various sizes are stored in the Loading Dock.

Deleted: A slide gate valve is closed to seal the culvert whenever potential liquid-bearing waste containers are loaded or unloaded at the loading dock.

10. Proposed language Change for Attachment G.6 Regarding PMR Language

Section 2.0

This section of the closure plan provides a description of the permitted unit which is located in the north-eastern portion of Area G and is comprised of an asphalt pad with ~~three structures~~ (Building 412 (the Decontamination and Volume Reduction System (DVRs), ~~the Mobile Visual Examination and Repackaging (MOVER), and support trailer for the MOVER~~) situated on it.

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The irregularly-shaped asphalt pad is approximately 358 feet (ft) long and 213 ft wide or approximately 76,000 square feet. The pad, ~~which is sloped 1% to 1.5% to the south and south-east for drainage~~ consists of a four to six inch (in) layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff). ~~The pad has three structures associated with it: Building 412 (DVRs); the MOVER; and the MOVER's support trailer.~~ Storage of mixed waste occurs ~~only on the Pad in Building 412.~~

Deleted: The pad is sloped from 1% to 1.5% to the south and south-east for drainage (see Permit Attachment A for information concerning drain and piping system connected to Pad 9)

Dome 226, ~~which was decommissioned in October 2009,~~ was located on the eastern portion of the permitted unit. The dome was approximately 286 ft long and 89 ft wide, was built of an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric anchored with bolts to the pad's concrete ring wall and had a surface area of about 22,300 square ft. The interior floor perimeter of the dome was surrounded with a 6-inch-high, 6-inch-wide asphalt curb and was equipped with personnel doors and a roll-up door on the south end for vehicle access. A ramp was located at the vehicle entrance to the dome, which allowed vehicles and container handling equipment to pass safely over the interior curb which prevented run-on into the dome. At the southern end of the dome was a drain connecting to the recessed sump in Pad 9's Dome 229. This fire protection drain system consists of a 10 in. line running southeast from where Dome 226 was located with secondary connecting drains from Domes 232 and 231. The purpose of this drain system was to provide additional fire water collection capacity in the event of an emergency. The sump and drain have ~~been plugged to prevent storm water from entering the system at the drainage point.~~

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Building 412 is a one story building that is approximately 220 ft long by 60 ft wide or 13,200 square ft. This building is currently used for storage and volume reduction of bulky mixed waste. It consists of two structures: an internal primary confinement structure that houses mixed waste processing operations; and an external confinement building, which contains the primary confinement structure. The building itself provides protection from the elements and a temperature-controlled space for the internal structures and associated process equipment. There are roll-up vehicle-access loading doors on the north and south ends of the building and personnel access doors on the north, east, and south for support of operations. The floor and foundation of the building are concrete and the floor is painted with an epoxy sealant. The concrete slab is

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above grade to direct potential run-on away from the building. The floor in the building is sloped to a sump that has a grating cover to provide traction and a level working surface.

The primary confinement structure is housed entirely within the building and consists of interconnected enclosures. The primary confinement is approximately 150 ft long by 50 ft wide by 16 ft high and sits directly on the sealed concrete floor. The primary confinement interlocks in a self supporting steel framework that can be assembled into multiple configurations. It is equipped with both large roll-up doors so that personnel, equipment, and material can access the primary confinement and move from one enclosure to the next. Equipment in the enclosures includes gloveboxes, dismantling tools (e.g., power saws, hammers, pry bars), shearing and bailing equipment. Building 412 contains fire protection piping as well as heating and ventilation ducting.

The MOVER is a 10 x 40-ft transportainer that contains a glovebox utilized to visually examine and repackage the contents of high activity transuranic waste drums. The MOVER unit is a certified DOT 7A Type A Container (CPC 1998). The MOVER is classified as a Type II (000) structure per NFPA 220, Standard on Types of Building Construction. Interior walls are constructed as double-walled for containment purposes with sealed and polished stainless steel interior for ease of decontamination. The outside walls of the MOVER are constructed of carbon steel. The walls are insulated with cellulose, which is manufactured under Consumer Product Safety Commission performance criteria mandating fire standards. The interior and exterior of the MOVER are non-flammable metal with steel stud construction. All electrical systems are designed to the National Electrical Code.

The MOVER is comprised of 3 rooms consisting of a control room, a glovebox operations room, and the drum entry room. The control room provides space for personnel entry, a portal radiation monitor, and system controls. There are doors between each section to isolate each room. Doors are kept closed during the glovebox operations to maintain negative pressure in the unit. Airflow direction is maintained so that air flows from areas of low contamination to areas of potentially higher contamination before being exhausted through the HEPA ventilation system. The unit has continuous air and fixed head monitors, intercom system, fire protection system, HVAC, and lighting.

The glovebox operation room contains the glovebox, drum lifter, HEPA filters and differential pressure-monitor panel. The drum entry room is located at one end of the trailer. This room provides space for four standard 55-gallon drums on transport dollies. Transuranic waste drums are bagged into the glovebox and opened. The contents are examined and then bagged out into another drum(s). Nonconformance items are identified and bagged out into a third drum. The empty parent drum and newly filled drum(s) are then removed from the MOVER unit. The glovebox is 12feet long, 2.75 feet high and the end is 2.3 feet wide at the top. The glovebox component is fabricated from Type 304L stainless steel and includes a HEPA ventilation system.

The MOVER support trailer is a 8 x 20 ft metal trailer that houses ventilation blowers and monitored discharge system, the fire suppression system, and electrical distribution system for the MOVER.

The permitted unit has been used for the storage of both liquid and non-liquid mixed waste and has stored the following waste types: solidified inorganic solids; leached process residues; salts and cement paste; ash; dewatered aqueous sludge; chemical treatment sludge; soils; combustible debris (e.g., plastics, rubber, laboratory trash, building debris); and heterogeneous debris.

Section 5.3.1

Building 412 (and its ancillary equipment), the MOVER, and its support trailer will be removed before the assessment.

Section 5.3.2

This includes: the gloveboxes, enclosure components, the cabinets in Building 412; bailing equipment; portable air monitors; all electronic devices and tools; and spill cleanup equipment containers in Building 412, the MOVER, and the support trailer. This list of equipment requiring decontamination may be revised during the review and assessment which would result in an amendment to this closure plan.

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The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. The sump in the DVRS building will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the drain on the floor. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

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Section 6.0

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit.

In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of wipe samples from the walls, the floor, and the ceiling of the MOVER for a minimum of five wipe samples.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the following locations:

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a. one sample every 250 square feet in the loading/unloading zone outside the MOVER (see Permit Section 9.4.7.1.ii(1));

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b. one sample every 900 square feet of the permitted unit for a total of 64 soil samples (see Permit Section 9.4.7.1.ii(2));

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c. one sample just off the southeast edge of the permitted unit where stormwater runs off the pad (see Permit Section 9.4.7.1.ii(3));

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1. if the soil sample collected at the southeast edge of the permitted unit detects hazardous constituents, ten samples shall be collected along the swale between the permitted unit and Pad 10 (see Permit Section 9.4.7.1.ii(8)) (see Figure G.6-2).

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d. one sample at the rock check dam at the far southeast end of Area G where stormwater discharges (see Permit Section 9.4.7.1.ii(3));

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1. if the soil sample collected at the rock check dam detects hazardous constituents, ten samples shall be collected along the swale between the permitted unit and Pad 10 (see Permit Section 9.4.7.1.ii(8)) (see Figure G.6-2).

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e. one sample at the floor drain at the south end of the permitted unit underlying the removed Dome 226 and one sample at the sump in Building 412 (see Permit Section 9.4.7.1.ii(5)); and

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f. one sample at all the joints and intersections of the ten inch fire protection drain line running southeast and then east toward Pad 9 TWISP domes (see Permit Section 9.4.7.1.ii(7)).

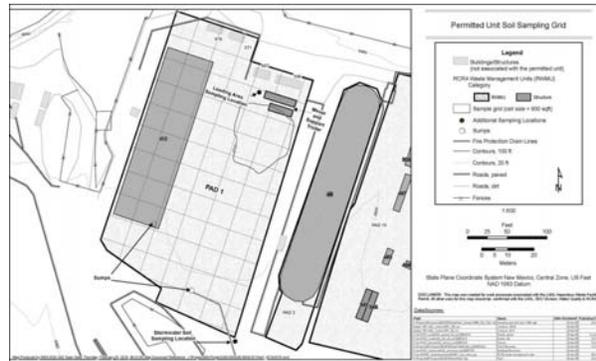
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Figures G.6-1 and G.6-2 illustrate these respective sampling locations at the permitted unit.

If there is liquid found in either the drain lines or the sumps at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

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Figure G.6-1

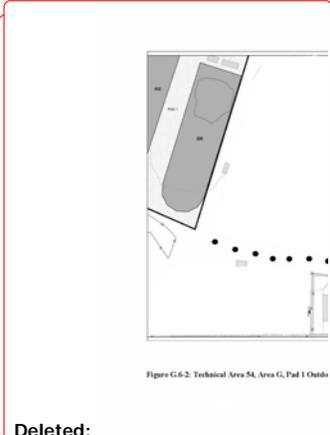


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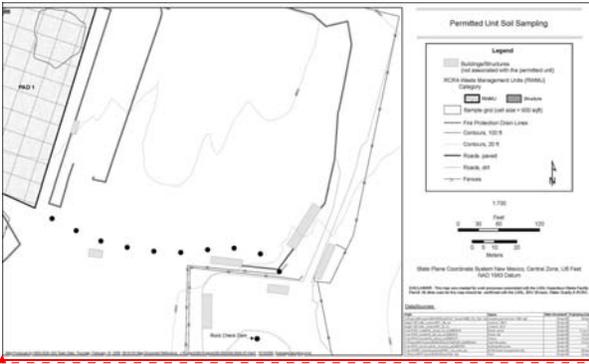
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Figure G.6-2



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11. Proposed language Changes for Attachment G.11 Regarding PMR Language

Section 2.0

TA 54-0547, Super High Efficiency Neutron Coincidence (SuperHENC) counter - Trailer TA-54-0457 houses a high efficiency neutron counter designed to handle large waste containers. It is designed to provide a passive neutron and gamma measurement of large transuranic waste containers like standard waste boxes. The SuperHENC will support the Facility's Transuranic Waste Characterization Project and Central Characterization Project operations beginning in 2010.

Deleted: TA54-0439, FRAM - The Fixed-Energy Response Function Analysis with Multiple Efficiency (FRAM) is a single high purity germanium detector with FRAM software to evaluate the isotopic composition of waste drums from gamma measurements. Two systems were housed in trailer TA54-0439. The system was coordinated with the High Efficiency Neutron Counter (HENC) and the Mobile Tomographic Gamma System (MTGS) to quantify neutron and gamma detections into plutonium mass data. The FRAM detectors were moved to TA54-0438 in 2008 to prepare the TA54-0439 trailer for removal from Pad 10.

Section 5.2.2

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspection of the floors, walls, and ceilings of the RTR2, the LANL HENC, the MCS HENC, the SuperHENC, the storage trailers (545 & 546), and the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents.

Deleted: TA-54-XXX1, Shed - this shed has not been used for waste storage or characterization.¶

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Section 5.3.2

All structures and related equipment that will be reused by the Facility will be decontaminated (see Table G.11-6) in accordance with Permit Section 9.4.3.1. This includes the RTR2, the LANL HENC, the MCS HENC, the SuperHENC, and the two storage trailers (545 & 546).

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Section 6.1

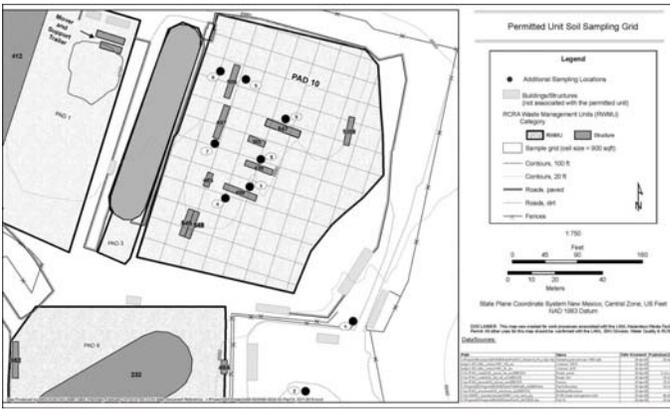
One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from each wall, floor, and ceiling of the RTR2, the LANL HENC, the MCS HENC, the SuperHENC, and the two storage trailers (545 and 546) for a total of 36 samples.

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Figure G.11-1





12. Proposed language Changes for Attachment G.12 Regarding PMR Language

Section 2.0

The permitted unit, which was constructed in 1998, is located in the western portion of Area G and consists of an asphalt pad that measures 478 feet long and 137 feet wide or approximately 65,500 square feet. It consists of four inches of asphalt built over underlying base course which overlies a minimum of six inches of tuff fill. It also has a dome (Dome 375) and a High Energy Real-Time Radiography transportainer (HERTR) situated on it. Hazardous waste is only stored in Dome 375.

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The permitted unit is sloped from 1% to 2% to the south/southeast for drainage and has curbing on the south and east sides as well. Drainage is directed to a series of four 5 inch-wide by 27 foot-long drains, all connected to two underground 8-inch diameter polyvinyl chloride pipes which discharge to a concrete lined ditch located near the southeast corner of the pad.

The permitted unit stores hazardous waste in both liquid and solid form in Dome 375. The dome, which is an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric, is 300 feet long by 100 feet wide and covers a surface area of approximately 30,000 square feet. It is anchored with anchor bolts to the interior concrete ring wall and is equipped with two double-panel rolling doors, one at the east end of the dome and the other on the west end. It also has 14 personnel doors located approximately every 31 to 57 feet along the dome's length. These doors allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a concrete ring wall, which helps prevent run-on into and runoff from the dome. Asphalt ramps located at the vehicle entrances allow vehicles and container handling equipment to pass safely over the curb.

The High Energy Real-Time Radiography (HERTR) transportainer, which sits on a concrete pad, is located on the eastern portion of Pad 11 and has an approximate footprint of 50 feet by 50 feet. It consists of two structures, a portable control room and a re-locatable X-ray vault constructed of modular concrete walls and blocks for shielding. Containers to be examined are loaded on the west side of the structure.

The HERTR, as well as equipment and operating machinery that is not sensitive to water intrusion, such as the equipment cabinets, will be decontaminated by steam cleaning using water or pressure washing with a solution consisting of a surfactant detergent (e.g., Alconox®) and water. Other equipment that is sensitive to water intrusion such as the portable air monitors, electronic devices and tools, and spill cleanup equipment containers in the dome, will be cleaned with a wipe-down wash with a solution consisting of a surfactant detergent (e.g., Alconox®) and water. Table G.12-8 in this closure plan lists the equipment needing decontamination. This list will be revised during the review and assessment as necessary.

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Section 6.1

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit. In compliance with Permit Section 9.4.7.1.ii.a, this closure plan will ensure the collection of soil samples from the following locations:

- a. one sample at the loading zone area (see Permit Section 9.4.7.1.ii(1));
- b. one soil sample every 900 square feet of the permitted unit for a total of 80 samples (see Permit Section 9.4.7.1.ii.a(2));
- c. one sample at the discharge points (in the concrete-lined ditch) of the two 80 foot long underground pipes that collect run-off at Pad 11 for a total of four samples (see Permit Section 9.4.7.1.ii.a(4)); and
- d. one sample at all joints and intersections of the two 80 foot long underground pipes that collect run-off at Pad 11 for a total of 16 samples (see Permit Section 9.4.7.1.ii.a(7)).

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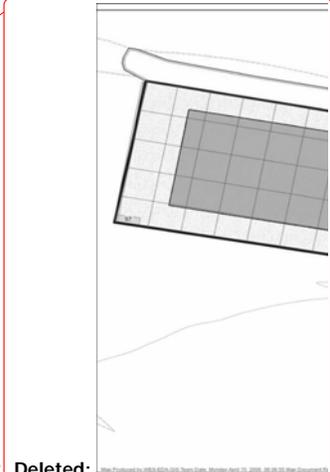
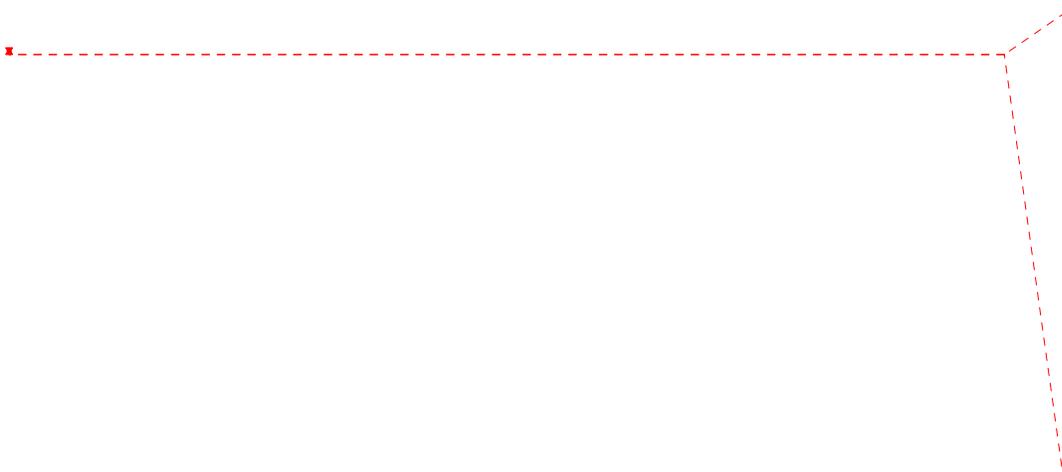
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Figure G.12-1 illustrates these proposed sampling locations.

If liquid is present in any of the drains or piping at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

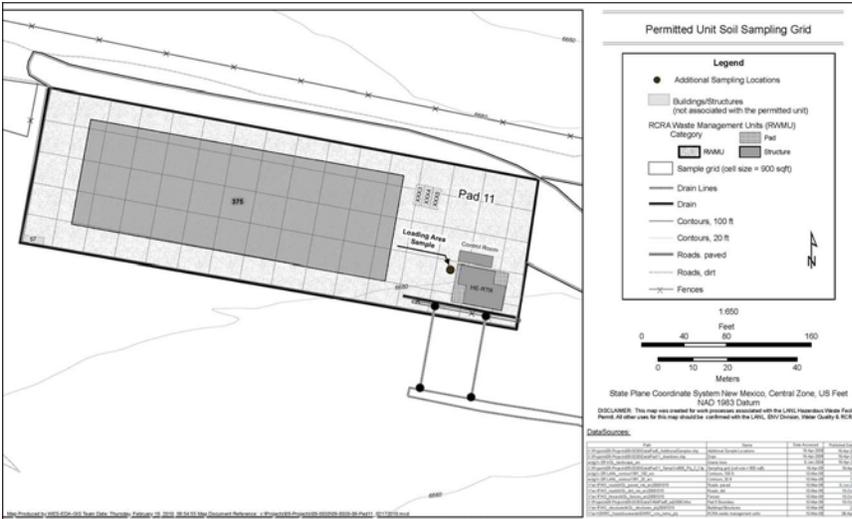
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Figure G.12-1



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13. Proposed language Changes for Attachment G.15

Section 2.0

Canopy 216, decommissioned in March 2010, was 33 ft wide by 120 ft long with an area of approximately 3,960 ft². The canopy consisted of a rigid aluminum frame anchored to a sloped asphalt pad which supported a tensioned membrane. All waste containers that were stored in Canopy 216, including gas cylinders, were stored on pallets or were otherwise elevated (e.g., metal supports, wooden timbers, baskets) to prevent contact with accumulated liquids. All liquid wastes were stored on secondary containment pallets.

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Section 5.3.1

The following structures and equipment will be removed before the structural assessment: Dome 215; equipment related to the dome and canopy (e.g., tensioned-fabric membranes, aluminum beams, trusses, ancillary equipment); and Building 39.

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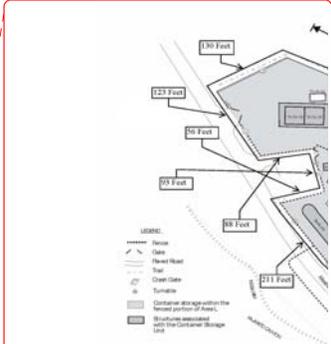
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Section 6.1

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floors, walls, and ceilings of storage buildings 68, 69, and 70, Storage Shed 31, and Building 39, the floors in Dome 215, where Canopy 216 was located, and covered storage pads 32, 35, 36, and 58, and the floor of the permitted unit for any existing cracks or conditions that indicate a potential for release of constituents.

Figure G.15-1



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Decontamination of the permitted unit will be conducted by first removing loose material through sweeping then by steam cleaning or pressure washing with a solution consisting of a surfactant detergent (e.g., Alconox®) and water and mixed in accordance with the manufacture’s recommendations. Decontamination of the interior surfaces of the permitted unit will include all features located within the unit.

The entirety of the unit’s floor will be decontaminated. Waste at the permitted unit is no longer stacked; however, past activities have allowed the stacking of 55-gallon drums. Including the height of any pallets that may have been used, two stacked 55-gallon drums measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of ten feet. Section 5.3.1 above says that the metal roof and walls will be removed; if things are removed, then they do not need decontamination because they will be managed as waste (see first sentence.) Then why are they decontaminating?

Ceilings of the permitted unit and walls above ten feet will be presumed to be free of contamination unless there is some physical indication of contamination (e.g., staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above height of ten feet.

Portable berms or other such devices (e.g., absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess water and provide containment during the decontamination process. The floor sump will be plugged, through the use of temporary curbing or portable berms, during decontamination to ensure that none of the wash water solution enters the sump located on the floor.

In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one verification wipe sample from the floor, one from each of the walls (four total), and one from the sump of the permitted unit for a total of six wipe samples (see Figure G.13-1). The precise locations for these wipe samples will be randomly determined at the time of sampling within the area of each surface.

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