

Attachment R

Action Levels for Corrective Action

R1. Background Concentrations for Soil

R2. Vadose Zone Baseline Concentrations for Non-Leachates

R3. Background Concentrations for Vadose Zone Water

R4. Vadose Zone Monitoring Indicator parameters

Attachment R provides a placeholder for the future determination of action levels for corrective action. The Vadose Zone Monitoring System (VZMS) Work Plan in Attachment I establishes plans for determining background/baseline concentrations for soil, non-leachate fluids, and vadose zone water. Samples will be collected and analyzed during installation of the VZMS and monitoring during Facility operations in accordance with the Permit Attachment F, Waste Analysis Plan. Analytical results will be evaluated according to the statistical analysis methods described in Attachment Q. This testing shall be used to determine the background/baseline concentrations needed to establish action levels for corrective action.

The VZMS Work Plan in Attachment I establishes plans to select indicator parameters for vadose zone monitoring. The future indicator parameters shall be established during operations by testing the chemical characteristics of leachate and non-leachate fluids. Leachate testing shall be performed in accordance with Permit Attachment F, Waste Analysis Plan. Using the baseline water quality characterizations and the leachate fluid analysis, chemical profiles of the water types as well as a suite of appropriate analytical indicator parameters shall be selected to be incorporated into the vadose zone monitoring program for leak detection during facility operations.