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M E M O R A N D U M

TO: Zeke Sherman, Environmental Manager
FROM: Steve Alexander, Water Resources Specialist
DATE: April 6, 1992
SUBJECT: PROPOSED AGENDA FOR APRIL 16, 1992 GRC-HRMB MEETING

Zeke:

There are two main topics of concern for the April meeting. The first is the proposed modifications to the facility's RCRA operating permit and the second is Closure of the Land Treatment Unit or application for Delay of Closure.

1. PROPOSED PERMIT MODIFICATIONS Due to the complexity associated with modification of a RCRA permit it is not possible to include all the details of the proposed modifications. Additionally, the changes described below will impact language in Modules II and III of the Permit. The following are some specifics which will be addressed:

Attachment G, Groundwater Monitoring Plan

- * Utilization of MW-4 as the facility background monitoring well will be discontinued and MW-4 will be utilized to obtain piezometric water elevation data only. The proposed background monitoring well OW-11 will be utilized as the replacement background monitoring well, as discussed in Attachment H, Additional Data Submittal Schedule.
- * In an attempt to provide an effective Detection Monitoring program the requirement to conduct statistical analysis and comparisons utilizing pH and conductivity will be discontinued by deleting these two indicator parameters from Tables G-2 and G-3.

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- * Background for organics will be the Method Detection Limits (MDL), not the values obtained from the new background monitoring well OW-11. Background values for metals will be determined from the first four quarterly sampling events of the new background monitoring well OW-11.
- 2. CLOSURE OR DELAY OF CLOSURE The detection of hazardous constituents below the five foot Treatment Zone requires GRC to institute the Closure Plan in order to fully characterize the existing condition of the Land Treatment Unit and the soil and groundwater below it. An approved Delay of Closure application could provide the needed characterization and allow for continued operation of the Land Treatment Unit for the treatment of non-hazardous wastes.

If you have any questions please contact me at 827-4300.

cc: Edward Horst, Program Manager

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