

PART VIII: CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

VIII.A. DEFINITIONS

For the purposes of this Part the following definitions shall apply:

"Facility" means all contiguous property under the ownership or control of the owner or operator seeking a permit under the Colorado Hazardous Waste Regulations, 6 CCR 1007-3.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"Solid waste management unit" (SWMU) means any discernible unit at which solid waste has been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste.

"Hazardous waste" means a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. The term hazardous waste includes hazardous constituent as defined below.

"Hazardous constituent" means any constituent identified in Appendix VIII of 6 CCR 1007-3 Part 261, or any constituent identified in Appendix IX of 6 CCR 1007-3 Part 264.

VIII.B. SUMMARY OF FINDINGS/RESULTS

The following Solid Waste Management Units (SWMUs) were identified during the RCRA Facility Assessment (RFA) and are shown in Figure VIII-1:

SWMU NO. 1: JOLLY-AXTELL NO. 2

This unit is a brine pond and area associated with the oil field production well Jolly-Axtell No. 2 Well, which was located near the northern boundary of the site. The well and pond were used from 1972 to 1986. The pond was closed and regraded in 1986. The wastes disposed in the brine pond consisted of oil field brines, with high levels of dissolved salts and generally trace levels of organic compounds associated with crude oil. The nature, rate, and extent of

constituent migration from the brine pond has been characterized, and is documented in the *RCRA Facility Investigation Report, Highway 36 Site Brine Ponds, Adams County CO*. The groundwater impacted by the operations of the former oil well and brine pond occurs in zones of perched ground water, approximately 10 to 50 feet below the ground surface. Over time the groundwater levels in these zones have decreased, due to removal of the Jolly Axtell pond as a source of liquids. There is no potential for further impacts or releases from this unit. No further action is required under the Corrective Action provisions of this Permit at this time.

SWMU NO.2: ZEXCO-STATE WELL NO. 1

This unit is the well head area of the Zexco-State Well No. 1, which was located near the western boundary of the site. The well was drilled in 1973, produced oil from 1981 thru 1983, and was plugged and abandoned in 1984. This is no evidence of a brine pond associated with the Zexco-State Well, however some surface contamination occurred near the well as a result of brine spills associated with the production of crude oil. The spills consisted of oil field brines, with high levels of dissolved salts and generally trace levels of organic compounds associated with crude oil. The nature, rate, and extent of constituent migration of contamination resulting from oil production activities has been characterized, and is documented in the *RCRA Facility Investigation Report, Highway 36 Site Brine Ponds, Adams County CO*. The groundwater impacted by the operations of the former oil well and brine pond occurs in zones of perched ground water, approximately 10 to 50 feet below the ground surface. Over time the groundwater levels in these zones have decreased, due to removal of the Zexco-State well as a source of liquids. There is no potential for further impacts or releases from this unit. No further action is required under the Corrective Action provisions of this Permit at this time.

SWMU NO. 3: DOMESTIC WASTEWATER TREATMENT UNIT AND ASSOCIATED EFFLUENT POND

This unit is a non-discharging domestic wastewater treatment works for treating domestic waste from the Operations Building kitchen and on-site restrooms in the Operations Building, Maintenance Building and Security Building. The system is designed for an average daily flow capacity of 3,150 gallons per day and organic loading capacity of 7.2 pounds BOD₅/day. The treatment process used is a packaged extended aeration treatment plant. The effluent from the treatment unit is held in a lined evaporation pond. Two lift stations of less than 2,000 gallons per day are used to transfer domestic waste from the Operations Building and Maintenance Building restrooms. The unit has been in operation since 1989 and operates under the approval of the Water Quality Control Division of the Colorado Department of Public Health and Environment. No laboratory or hazardous wastes are treated in this unit. No evidence of a release has been

noted. No further action is required under the Corrective Action provisions of this Permit at this time.

SWMU NO.4: CONCRETE RUBBLE AREA

This unit is an area used for the disposal of concrete rubble and debris, including rebar from construction, repair and maintenance of the facility. The area, used since 1988, is located north of SWMU No. 1. The area consists of a slight depression (3-4 feet) in the ground and is approximately 100 feet wide x 200 feet long, with excavated dirt mounded on the north end of the area. Contents of the rubble area include demolition concrete from groundwater monitoring well pads, from box testing plugs, bumper posts, broken parking lot barriers, heels from concrete trucks, minimal rebar, and miscellaneous concrete from other demolitions. The total volume for this unit is approximately 1700 cubic yards. Concrete from waste handling areas, oils, antifreeze or other liquids, or hazardous waste are not placed in this unit. The Permittee is allowed to continue using this unit for the accumulation of discarded concrete debris and heels of concrete trucks, as long as it is operated in accordance with the Regulations Pertaining to Solid Waste Disposal Sites and Facilities, 6 CCR 1007-2. At the time of closure of this unit, it will be closed according to the closure requirements for Solid Waste Management Units. No evidence of a release has been noted. No further action is required under the Corrective Action provisions of this Permit at this time.

SWMU NO.5: WASTEWATER TREATMENT PLANT

This unit is the facility's wastewater treatment plant. The plant is authorized under the Water Quality Division of the Colorado Department of Public Health and Environment under NPDES permit No. CO-0042064. Located on the east side of the facility, the building has a footprint of 50 x 100 feet. It consists of a sheet metal enclosed building with a concrete floor equipped with integral floor drains. Water to be treated is conducted through either of two flow circuits depending upon the water's classification as contaminated or potentially contaminated. Potentially contaminated water originates from the Potentially Contaminated Retention Basin (PCRB)(now designated the Segregated Stormwater Retention Basin). Contaminated water has the following sources: secure cell leachate collection systems, operations sump, maintenance sump, contaminated water tanks, north and east scrubber blowdown, truck wash sump, drum storage area, treatment basin wash water, and bulk liquid reagent storage.

Potentially contaminated water completes the following circuit: PCRB water is pumped to the reaction tank where ferric hydroxide/ferric sulfate and lime are introduced. Following sufficient contact time under impeller mixing, the mixture is pumped to a clarifier where a polyelectrolyte flocculent is introduced for phase separation. The underflow proceeds to the sludge thickener

and hence to the filter press. Dewatered sludge exits the system here for landfill disposal if sufficiently dry or if not, then it is treated with cement or kiln dust pozzolans for subsequent disposal. Overflow from the thickener is recycled as makeup water in the process. Supernatant from the filter press is recycled back to the clarifier. The overflow from the clarifier is routed through multimedia filtration (two in parallel) and then through a granular activated carbon filtration step (three in parallel). The polished water is then pumped to the backwash water and treated water storage tank where pH adjustment with hydrochloric acid is performed with some of this water being recycled to backwash the filtration units. The remaining water is pumped to the treated water accumulation tanks where it can then be discharged or more likely utilized in waste treatment.

Water classified as contaminated is routed along the following circuit: Contaminated water is pumped from the aforementioned sources to the contaminated water storage tanks (2 x 250,000 gallons). The water is then pumped to the reaction tank where ferric hydroxide/ferric sulfate and lime are introduced via impeller mixing. After sufficient residence time, the mixture is pumped to the clarifier flash mix tank where flocculent is introduced to assist phase separation. The mixture cascades into the flocculent tank to promote efficient floc size increase. The flocced mixture then cascades to the clarifier for solids/liquids separation. The clarifier underflow is then routed through the same thickening/dewatering circuit as mentioned previously, ultimately resulting in an acceptably dry filter cake for disposal in a secure cell. The overflow from the clarifier is sent to the clarifier clear well storage tank and hence through multimedia filtration and granular activated carbon filtration polishing, then to the backwash water and treated water storage tank where pH adjustment with hydrochloric acid is performed, and finally to the treated water accumulation tank for waste processing or ultimate discharge.

The structure and floor of the wastewater treatment plant are sound. No evidence of a release has been noted. No further action under Corrective Action is recommended at this time.

VIII. C. STANDARD CONDITIONS

The following conditions outline procedures that must be followed if any future potential releases occur or if any new SWMU are identified.

- VIII.C.1. Section 3004(u) of RCRA, as amended by HSWA, and 6 CCR 1007-3, §264.101 require that permits issued after November 8, 1984, address corrective action for releases of hazardous wastes including hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the waste was placed in the unit.

- VIII.C.2. Failure to submit the information required in this Corrective Action Schedule of Compliance, or falsification of any submitted information, is grounds for termination of this Permit [6 CCR 1007-3 §100.64]. The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Director required in this Corrective Action Schedule of Compliance are signed and certified in accordance with 6 CCR 1007-3 §100.42(k). Two copies of these plans, reports, notifications or other submissions shall be submitted to the Director, and sent by mail or hand delivered to:

Colorado Department of Public Health and Environment
Hazardous Materials & Waste Management Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530

- VIII.C.3. All plans and schedules required by the conditions of this Corrective Action Schedule of Compliance are, upon approval of the Director, incorporated into this Schedule of Compliance by reference and become an enforceable part of this Permit. Extensions of the due dates for submittal may be granted by the Director in accordance with the permit modification processes under 6 CCR 1007-3 §100.6.
- VIII.C.4. If the Director determines that further actions beyond those provided in this Corrective Action Schedule of Compliance, or changes to that which is stated herein, are warranted, the Director shall modify the Schedule of Compliance according to procedures in the permit modification processes under 6 CCR 1007-3 §100.6.
- VIII.C.5. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Corrective Action Schedule of Compliance shall be maintained at the facility during the term of the Permit, including any reissued Permits.

VIII.D. REPORTING REQUIREMENTS

- VIII.D.1. The Permittee shall submit to the Director signed quarterly progress reports of all activities (e.g., SWMU Assessments, Interim Measures,

RCRA Facility Investigations, Corrective Measures Studies) conducted pursuant to the provisions of this Corrective Action Schedule of Compliance, beginning no later than ninety (90) calendar days after the Permittee is first required to begin implementation of any requirement herein. These reports shall contain:

- VIII.D.1.a. A description of the work completed;
 - VIII.D.1.b. Summaries of all findings, including summaries of laboratory data;
 - VIII.D.1.c. Summaries of all problems or potential problems encountered during the reporting period, and actions taken to rectify problems; and
 - VIII.D.1.d. Projected work for the next reporting period.
- VIII.D.2. Copies of other reports (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Director upon request.
- VIII.D.3. As specified under condition VIII.C.4 of this permit, the Director may require the Permittee to conduct new or more extensive assessments, investigations, or studies, as needed, based on information provided in these progress reports or other supporting information.

VIII.E. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNITS

- VIII.E.1. The Permittee shall notify the Director in writing of any newly-identified SWMU(s) (i.e., a unit not specifically identified during the RFA and listed in condition VIII.B. of this permit) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than fifteen (15) calendar days after discovery.
- VIII.E.2. After such notification, the Director may request, in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the provisions in the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.

- VIII.E.3. Within sixty (60) calendar days after receipt of the Director's request for a SWMU Assessment Plan, the Permittee shall prepare a SWMU Assessment Plan, for determining past and present operations at the unit, as well as any sampling and analysis of ground water, land surface and subsurface strata, and surface water or air, as necessary to determine whether a release of hazardous waste including hazardous constituents from such unit(s) has occurred, is likely to have occurred, or is likely to occur. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste including hazardous constituents from the newly-discovered SWMU(s) to the environment.
- VIII.E.4.a. After the permittee submits the SWMU Assessment Plan, the Director shall either approve or disapprove the Plan in writing.
- VIII.E.4.b. If the Director approves the Plan, the Permittee shall begin to implement the Plan within thirty (30) calendar days of receiving such written notification.
- VIII.E.4.c. If the Director disapproves the Plan, the Director shall either (1) notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan, or (2) revise the Plan and notify the Permittee of the revisions. This Director-revised Plan becomes the approved SWMU Assessment Plan. The Permittee shall implement the Plan within thirty (30) calendar days of receiving written approval.
- VIII.E.5. The Permittee shall submit a SWMU Assessment Report to the Director no later than sixty (60) calendar days from completion of the work specified in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. At a minimum., the Report shall provide the following information for each newly-identified SWMU:
- VIII.E.5.a. The location of the newly-identified SWMU in relations to other SWMUs;
- VIII.E.5.b. The type and function of the unit;

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- VIII.E.5.c. The general dimensions, capacities, and structural description of the unit, including any available drawings;
- VIII.E.5.d. The period during which the unit was operated;
- VIII.E.5.e. The specifics on all wastes that have been or are being managed at the SWMU, to the extent available; and
- VIII.E.5.f. The results of any sampling and analysis required for the purpose of determining whether releases of hazardous wastes including hazardous constituents have occurred, are occurring, or are likely to occur from the unit.
- VIII.E.6. Based on the results of this Report, the Director shall determine the need for further investigations at specific unit(s) covered in the SWMU Assessment. If the Director determines that such investigations are needed, the Director may require the Permittee to prepare a plan for such investigations. This plan will be reviewed for approval as part of the RFI Workplan under condition VIII.G. of this Corrective Action Schedule of Compliance.

VIII.F. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT SWMUS

The Permittee shall notify the Director, in writing, of any release(s) of hazardous waste including hazardous constituents discovered during the course of groundwater monitoring, field investigation, environmental auditing, or other activities undertaken after the commencement of the RFI, no later than fifteen (15) calendar days after discovery. Such newly-discovered releases may be from newly-identified units, from units for which, based on the findings of the RFA, the Director had previously determined that no further investigation was necessary, or from units investigated as part of an RFI. The Director may require further investigation of the newly-identified release(s). A plan for such investigation will be reviewed for approval as part of the RFI Workplan under condition VIII.G. of this permit.

VIII.G. RCRA FACILITY INVESTIGATION (RFI) WORKPLAN

If it is determined a RCRA Facility Investigation Workplan is required, the following procedures shall be followed.

- VIII.G.1. The Workplan shall describe the objectives of the investigation and the overall technical and analytical approach to completing all actions necessary to characterize the nature, direction, rate, movement, and concentration of releases of hazardous waste including hazardous constituents from specific units or groups of units, and their actual or potential receptors. The Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the RFI.
- VIII.G.2. After the Permittee submits the Workplan, the Director will either approve or disapprove the Workplan in writing.
- If the Director disapproves the Workplan, the Director shall either (1) notify the Permittee in writing of the Workplan's deficiencies and specify a due date for submittal of a revised Plan, or (2) revise the workplan and notify the Permittee of the revisions. This modified Workplan becomes the approved RFI Workplan.
- VIII.G.3. The Director shall review for approval as part of the RFI Workplan any plans developed pursuant to condition VIII.E of this permit, addressing further investigations of newly-identified SWMUS, or condition VIII.F., addressing new releases from previously-identified units. The Director shall modify the Schedule of Compliance according to the permit modification procedures under 6 CCR 1007-3 §100.6, to incorporate these units and releases into the RFI Workplan.

VIII.H. RCRA FACILITY INVESTIGATION WORKPLAN IMPLEMENTATION

No later than forty-five (45) calendar days after the Permittee has received written approval from the Director for the RFI Workplan, the Permittee shall begin implementation of the RCRA Facility Investigation according to the schedules specified in the RFI Workplan. Pursuant to condition VIII.C.3. of this permit, the RFI shall be conducted in accordance with the approved RFI Workplan.

VIII.I. RCRA FACILITY INVESTIGATION FINAL REPORT

- VIII.I.1. Within ninety (90) calendar days after the completion of the RFI, the Permittee shall submit an RFI Final Report. The RFI Report shall

describe the procedures, methods, and results of all facility investigations of SWMUs and their releases, including information on the type and extent of contamination at the facility, sources and migration pathways, and actual or potential receptors. The RFI Final Report shall present all information gathered under the approved RFI Workplan. The Final Report must contain adequate information to support further corrective action decisions at the facility.

- VIII.I.2. After the Permittee submits the RFI Final Report the Director shall either approve or disapprove the Report in writing.

If the Director approves the RFI Report, the Permittee shall mail a short summary of the approved RFI Report to all individuals on the facility mailing list established pursuant to 6 CCR 1007-3 §100.506(c)(I)(ii) and (iii), within fifteen (15) calendar days of receipt of approval.

If the Director determines the RFI Final Report did not fully detail the objectives stated under Permit Condition VIII.G., the Director may disapprove the RFI Final Report. If the Director disapproves the Report, the Director shall notify the Permittee in writing of the Report's deficiencies and specify a due date for submittal of a revised Final Report. The Permittee shall mail a short summary of the approved Final Report to all individuals on the facility mailing list.

VIII.J. DETERMINATION OF NO FURTHER ACTION

- VIII.J.1. Based on the results of the RFI and other relevant information, the Permittee may submit an application to the Director for a Class III permit modification under 6 CCR 1007-3 §100.638 to terminate the Corrective Action Schedule of Compliance. This permit modification application must contain information demonstrating that there are no releases of hazardous wastes including hazardous constituents from SWMUs at the facility that pose a threat to human health and the environment, and information required in 6 CCR 1007-3 §100.63(c).

If, based upon review of the Permittee's request for a permit modification, the results of the RFI, and other information, including comments received during the 60-day public comment period required for Class III permit modifications, the Director determines that releases or suspected releases that were investigated either are non-existent or do not pose a threat to

human health and the environment, the Director will prepare a draft permit for the requested modification.

- VIII.J.2. A determination of no further action shall not preclude the Director from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, the Director shall initiate a modification to the Corrective Action Schedule of Compliance according to the procedures for a permit modification, as specified in 6 CCR 1007-3 §100.6, to rescind the determination made in accordance with Permit Condition VIII.K.1.

VIII.K. CORRECTIVE MEASURES STUDY PLAN

- VIII.K.1. If the Director has reason to believe that a SWMU has released concentrations of hazardous constituents in excess of an action level, or if the Director determines that contaminants present at levels below an action level pose a threat to human health and the environment given site-specific exposure conditions, the Director may require a Corrective Measures Study (CMS) and shall notify the Permittee in writing. This notice shall identify the hazardous constituent(s) that have exceeded action levels as well as those which have been determined to threaten human health and the environment given site-specific exposure conditions. The notification may also specify remedial alternatives to be evaluated by the Permittee during the CMS.
- VIII.K.2. The Permittee shall submit a CMS Plan to the Director within sixty (60) calendar days from notification of the requirement to conduct a CMS. The CMS Plan shall provide the following information:
- VIII.K.2.a. A description of the general approach to investigating and evaluating potential remedies;
 - VIII.K.2.b. A definition of the overall objectives of the study;
 - VIII.K.2.c. The specific plans for evaluating remedies to ensure compliance with remedy standards;
 - VIII.K.2.d. The schedules for conducting the study; and
 - VIII.K.2.e. The proposed format for the presentation of information.

- VIII.K.3. If the Director disapproves the CMS Plan, the Director shall either (1) notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan, or (2) revise the Plan and notify the Permittee of the revisions. This modified Plan becomes the approved CMS Plan.

VIII.L. CORRECTIVE MEASURES STUDY IMPLEMENTATION

No later than forty-five (45) calendar days after the Permittee has received written approval from the Director for the CMS Plan, the Permittee shall begin to implement the Corrective Measures Study according to the schedules specified in the CMS Plan. Pursuant to Permit Condition VI.C.3., the CMS shall be conducted in accordance with the approved Plan.

VIII.M. CORRECTIVE MEASURES STUDY FINAL REPORT

- VIII.M.1. Within ninety (90) calendar days after the completion of the CMS, the Permittee shall submit a CMS Final Report. The CMS Final Report shall summarize the results of the investigations for each remedy studied and of any bench-scale or pilot tests conducted. The CMS Report must include an evaluation of each remedial alternative. The CMS Report shall present all information gathered under the approved CMS Plan. The final report must contain adequate information to support the Director in the remedy selection decision making process, described under condition VIII.N of the Corrective Action Schedule of Compliance.
- VIII.M.2. If the Director determines that the CMS Final Report does not fully satisfy the information requirements specified under condition VIII.M. of this permit, the Director may disapprove the CMS Final Report. If the Director disapproves the Final Report, the Director shall notify the Permittee in writing of deficiencies in the Report and specify a due date for submittal of a revised Final Report.
- VIII.M.3. As specified under condition VIII.M.1., based on preliminary results and the final CMS report, the Director may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.N. REMEDY SELECTION

Based on the results of the CMS and any further evaluations of additional remedies under this study, the Director shall select remedial alternative(s) evaluated in the CMS that will (1) be

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

VIII.O. PERMIT MODIFICATION FOR REMEDY

- VIII.O.1 Based on information the Permittee submits in the RFI Final Report, the CMS Final Report, and other information, the Director will select a remedy and initiate a permit modification to this Permit, pursuant to 6 CCR 1007-3, §100.6.
- The modification must specify the selected remedy and include, at a minimum, the following:
- VIII.O.2 Description of all technical features of the remedy that are necessary for achieving the standards for remedies established under condition VIII.O.1. of this permit, including length of time for which compliance must be demonstrated at specified points of compliance;
- VIII.O.3 All concentration levels of hazardous constituents in each medium that the remedy must achieve to be protective of human health and the environment;
- VIII.O.4 All requirements for achieving compliance with these concentration levels;
- VIII.O.5 All requirements for complying with the standards for management of wastes;
- VIII.O.6 The requirements for removal, decontamination, closure, or post-closure of units, equipment, devices or structures that will be used to implement the remedy;
- VIII.O.7 A schedule for initiating and completing all major technical features and milestones of the remedy; and
- VIII.O.8 The requirements for submission of reports and other information.

VIII.P. INTERIM MEASURES

The Permittee may propose for approval or the Director may require additional interim corrective measures.

VIII.Q. COMMUNITY RELATIONS REQUIREMENTS

- VIII.Q.1 Except in the case of an emergency, when either CHDT or CDPHE issues a press release or initiates media contact for the purpose of providing information to the media with reference to any corrective actions, CHDT or CDPHE shall advise the other party of such press release or media contact, and the contents thereof, at least two (2) working days prior to issuance.
- VIII.Q.2 CDPHE or CHDT may review, evaluate, and comment upon any informational materials (e.g. fact sheets information updates, newsletters, etc.) pertaining to any corrective action activities prepared to support community involvement activities
- VIII.Q.3 The Permittee will notify CDPHE at least seven (7) working days prior to any community meetings scheduled as part of the Permittee's community involvement efforts.
- VIII.Q.4. Upon CDPHE approval of the final RFI report, the Permittee must mail a short summary of the final approved RFI report to all individuals on the facility mailing list established pursuant to 6 CCR 1007-3 §100.506(c)(i), (ii), and (iii), within fifteen calendar days of the receipt of approval.

VIII.R. MODIFICATION OF THE CORRECTIVE ACTION COMPLIANCE SCHEDULE

If at any time the Director determines that modification of the Corrective Action Schedule of Compliance is necessary, he may initiate a modification to the Schedule of Compliance according to the procedures specified in 6 CCR 1007-3, §100.6.

TABLE VIII.R.1.: CORRECTIVE ACTION COMPLIANCE SCHEDULE SUMMARY

Below is a summary of the planned reporting requirements pursuant to Part VIII's Schedule of Compliance:

Facility Submission Requirements	Due Date
Notification of newly-identified SWMUs	fifteen (15) calendar days after discovery
Notification of newly-discovered releases	fifteen (15) calendar days after discovery
Progress reports on all activities	Quarterly
SWMU Assessment Plan for newly-identified SWMUs	thirty (30) calendar days after receipt of request
Revised SWMU Assessment Plan	as determined
Implement SWMU Assessment Plan	thirty (30) calendar days after Director approval
SWMU Assessment Report	forty five (45) calendar days after completion of implementation of SWMU Assessment Plan
RFI Workplan for Newly Identified SWMU's or Releases	as determined
Revised RFI Workplan	as determined
Implement RFI Workplan	forty five (45) calendar days after Director approval
RFI Report	ninety (90) calendar after completion of the field investigations of the RFI
Revised RFI Report	as determined
Mail RFI Summaries to Mailing List	fifteen (15) calendar days After Director Approval
CMS Plan	sixty (60) calendar days after notification of requirement to perform CMS
Revised CMS Plan	as determined
Implement CMS Plan	forty-five (45) calendar days after Director approval
CMS Report	ninety (90) calendar days after completion of implementation of CMS plan
Revised CMS Report	as determined