

PART II: GENERAL FACILITY CONDITIONS

II.A DESIGN AND OPERATION OF FACILITY

There are two closed hazardous waste land disposal units, known as Station B and Station E. Station B was closed by stabilizing the wastes with flyash. A double lined vault was constructed within the excavation that includes both leachate collection and leak detection systems. The stabilized wastes were contained in the vault. A multi-layer cap was constructed over Station B. Closure Certification for Station B was received by CDPHE on January 15, 1992. Station E, formerly a waste pile, was closed by placing a multilayer cap over the unit. Closure certification for Station E was received by CDPHE on December 11, 1989. A general description of Stations B and E is located in Attachment 2. The types of waste contained in the disposal units are listed in Attachment 13. Stations B and E have been maintained and ground water monitoring has been conducted since closure under a post-closure plan, that was approved by the Director on May 13, 1992.

The Permittee must conduct post-closure care operations at Station B and Station E to minimize the possibility of a fire, explosion, or any unplanned, sudden or nonsudden release of hazardous waste constituents to air, soil, or surface water or groundwater that could threaten human health or the environment, as specified in Attachment 9, and as required by 6 CCR 1007-3, Section 264.31.

II.B GENERAL WASTE ANALYSIS

The Permittee must follow the waste analysis procedures for the ground water collected pursuant to the ground water monitoring program and for the landfill leachate required by 6 CCR 1007-3, Section 264.13, as described in the attached Waste Analysis Plan, Permit Attachment 3.

II.C PERSONNEL TRAINING

The Permittee must conduct personnel training, as required by 6 CCR 1007-3, Section 264.16. This training program must follow the attached outline, Permit Attachment 6.

II.C.1 The Permittee must maintain training documents and records, as required by 6 CCR 1007-3, Section 264.16(d) and (e). Training records on personnel must be kept for three years after the close of the post-closure care period.

II.C.2 The Permittee must conduct annual update courses for personnel of the initial training provided in Attachment 6.

II.D LOCATION STANDARDS

The Permittee must conduct post-closure care operations at the facility to prevent washout of any hazardous waste from Station B and Station E by a 100-year flood, as required by 40 CFR 264.18(b)(1) as specified in Permit Attachments 5 (Inspection Plan and Schedule) and 7 (Location Maps).

II.E PREPAREDNESS AND PREVENTION

II.E.1 Required Equipment

At a minimum, the Permittee must maintain at the facility, or have available when on site at the facility, the equipment set forth in the facility's Contingency Plan, Permit Attachment 8, that shall be submitted according to the schedule specified in Permit Condition I.I, and as required by 6 CCR 1007-3, Section 264.32.

II.E.2 Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Permit Condition II.E.1 as indicated in the Contingency Plan, to assure its proper operation in time of emergency and as required by 6 CCR 1007-3, Section 264.33.

II.E.3 Access to Communications or Alarm System

The Permittee must maintain access to the communications or alarm system, as required by 6 CCR 1007-3, Section 264.34, and specified in the Contingency Plan, Attachment 8.

II.E.4 Arrangements with Local Authorities

The Permittee must maintain arrangements with state and local authorities, as required by 6 CCR 1007-3, Section 264.37. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record. Requirements for arrangements with state and local authorities are specified in the Contingency Plan, Attachment 8.

II.F CONTINGENCY PLAN

II.F.1 Implementation of Plan

The Permittee must immediately carry out the provisions of the Contingency Plan, Permit Appendix 8, whenever there is a fire, explosion, or release of hazardous waste or constituents that could threaten human health or the environment. In particular, the

Contingency Plan must specify procedures to be followed in the event of a breach of the cap at Station B or Station E, and subsequent contaminated runoff.

II.F.2 Copies of Plan

The Permittee must keep a copy of the Contingency Plan and all revisions at the Evraz Rocky Mountain Steel's environmental office, and must submit the copies of the plan with all relevant maps, figures, and revisions to all local fire departments, hospitals and local emergency response teams that may be called to provide emergency services in accordance with the requirements of 6 CCR 1007-3, Section 264.53.

II.F.3 Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan, as required by 6 CCR 1007-3, Section 264.54.

II.F.4 Emergency Coordinator

A trained emergency coordinator must be available at all times in case of an emergency, as required by 6 CCR 1007-3, Section 264.55.

The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be supplied to the Director or his or her designee. [6 CCR 1007-3, Section 264.52(d)].

II.G MANIFEST SYSTEM

The Permittee must comply with the manifest requirements of 6 CCR 1007-3, Section Part 262, and Sections 264.71 and 264.72 when and if hazardous wastes are shipped off-site.

II.H RECORD KEEPING AND REPORTING

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

II.H.1 Operating Record

The Permittee must maintain a written post-closure operations record at the designated post-closure operations office, in accordance with 6 CCR 1007-3, Section 264.73.

II.H.2 Biennial Report

The Permittee must comply with the biennial reporting requirements of 6 CCR 1007-3, Section 264.75.

II.I FINANCIAL ASSURANCE AND COST ESTIMATE FOR FACILITY AND POST-CLOSURE

- II.I.1 The Permittee must maintain financial assurance during the post-closure period and comply with all applicable requirements of 6 CCR 1007-3 Part 266. [6 CCR 1007-3 266.14]
- II.I.2 The Permittee must demonstrate continuous compliance with 6 CCR 1007-3, Section 266.14 by providing documentation to the Director that the value of the financial assurance mechanism exceeds the remaining cost of post-closure care, in order for the Director to approve a release of funds. Changes in the financial assurance mechanism must be approved by the Director. [6 CCR 1007-3 266.14(a) and 266.18]
- II.I.3 The Permittee's most recent post-closure care cost estimate, prepared in accordance with 6 CCR 1007-3, Section 266.13 is specified in Permit Attachment 10 as updated.
- II.I.4 The Permittee must adjust the post-closure cost estimate for inflation and/or changes in the costs specified in Permit Attachment 10 within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 6 CCR 1007-3 266.14 [6 CCR 1007-3 266.13(b)]
- II.I.5 The Permittee must submit to the Director the adjusted post-closure care cost estimate on or before the anniversary date of the establishment of the financial instrument(s) used to comply with 6 CCR 1007-3, Section 266.14.
- II.I.6 The Permittee must revise the post-closure cost estimate whenever there is a change in the facility's post-closure care activities, as required by 6 CCR 1007-3, Section 266.13(c).
- II.I.7 The Permittee must keep at the Evraz Rocky Mountain Steel's environmental office the latest post-closure cost estimate, as required by 6 CCR 1007-3, Section 266.13(d).

II.J INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee must comply with 6 CCR 1007-3, Section 266.17, whenever necessary.

II.K LAND DISPOSAL RESTRICTIONS

The Permittee must comply with all applicable parts of 6 CCR 1007-3, Part 268 and 40 CFR, Part 268 regulations.

II.K.1 The permittee must specifically comply with the notification requirements for facilities as specified in 268.7(a)

II.L WASTE MINIMIZATION REQUIREMENTS

The Permittee shall submit an annual certification to the Director by December 31 of each year, or alternate date approved in writing by the Director, that a program is in place at the facility to reduce the volume and toxicity of hazardous waste that is generated to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or disposal that is currently available to the Permittee minimizes the present and future threat to human health and the environment.