

## **ATTACHMENT 3**

### **WASTE ANALYSIS PLAN**

Stations B and E are landfills closed in place. These units do NOT receive hazardous waste and therefore a waste analysis plan for incoming waste as indicated in 6 CCR 1007-3, Section 264.13 is not applicable or appropriate.

This plan addresses two waste streams that may be generated by the closed landfills. These streams include leachate/leak detection water and purge water from groundwater monitoring wells. These waste streams will be characterized and disposed of using the following procedure:

- Hazardous waste determination using the criteria detailed in 6 CCR 1007-3, Part 262.10 and 6 CCR 1007-3, Part 262.11
- If the waste is determined to be non-hazardous, it will be managed as solid waste under subtitle D.
- If the waste is determined to be hazardous, it will be managed as a hazardous waste as follows:
  - Stored in accordance with 6 CCR 1007-3, Part 262.30 through 6 CCR 1007-3, Part 262.34
  - Managed in accordance with 6 CCR 1007-3, Part 262.30 through 6 CCR 1007-3, Part 262.43
  - Transported in accordance with 6 CCR 1007-3, Part 263
  - Disposed of at a permitted hazardous waste disposal facility in accordance with applicable portions of 6 CCR 1007-3, Parts 264, 265 and 268 and the disposal company's permit conditions.

## **ATTACHMENT 4**

### **SITE SECURITY**

The EVRAZ plant is surrounded by a fence that is periodically inspected and is maintained when necessary. The main entrance gate is monitored 24 hours per day by guards. The guards conduct periodic unscheduled inspections of EVRAZ's property numerous times each day. Stations B and E are within the plant facility's boundary. Outlying gates to the plant are locked on the weekends.

Station B and E are fenced and signed as off limits to unauthorized personnel. Since both Stations B and E are in post closure, access is only required for maintenance and inspection activities. The keys to the locked gates are controlled by the Environmental Department.

In addition, a fence has been installed completely around both Stations B and E drainage and diversion system to prevent damage to the cap, cover and drainage and diversion system from ongoing site operations. Access to Station B and E is controlled and limited to authorized personnel. Signs with the legend "Danger-Unauthorized Personnel Keep Out," in English and Spanish are posted on all sides of the fence and at the controlled access points. The signs are legible from a distance of at least 25 feet. The fences are four-foot high, three strand barbed wire.

## ATTACHMENT 5

### INSPECTION PLAN AND SCHEDULE

#### Inspection Schedules

The facilities will be inspected on a monthly basis to visually observe the closure areas, as outlined below. Inspection of groundwater monitoring wells will occur during sampling, as outlined in Figure 3 and the most current Groundwater Monitoring Plan.

#### Schedule and Inspection Items

Visual inspections of Stations B and E will be conducted by EVRAZ Environmental Department on a monthly basis. Additional inspections will be performed after a 25 year, 24-hour event of 3.8 inches of rain or more. The inspection will include observation of the caps, covers, embankments, adjacent slopes, drainage and diversion systems, benchmarks, fences, and signs.

The visual observations will be recorded on inspection forms. The inspection forms for Station B and E are shown on Figures 1 and 2, respectively. If necessary maintenance is identified during the inspections, the maintenance will be performed as soon as possible, weather permitting, but no later than 14 days from discovery. Defective locks will be repaired or replaced immediately. Once the maintenance activity is completed, a written report will be prepared outlining the work performed. These reports will be kept with the inspection records.

Wells will be inspected annually at a minimum. In addition, each well will be inspected before it is sampled. Items to be inspected are listed on Figure 3. If necessary maintenance is identified during the inspections, the maintenance will be performed as soon as possible but no later than 14 days from discovery. Defective locks and well caps will be repaired or replaced immediately.

#### Recordkeeping

The monthly inspection reports and documentation of follow-up maintenance activities will be maintained in the EVRAZ Environmental Offices in an electronic format retained by the EVRAZ Environmental Manager.

The groundwater monitoring well inspection forms will be kept with the monthly inspection reports. All well repairs and maintenance activities will be documented. The groundwater sampling reports will be maintained separately at the EVRAZ office. Records of inspection must be kept for the duration of the 30 year post-closure care period.

FIGURE 1

STATION B SURFACE IMPOUNDMENT INSPECTION FORM  
(page 1 of 2)

Name of Inspector \_\_\_\_\_ Date \_\_\_\_\_  
Is this a scheduled inspection? \_\_\_\_\_

INSPECTION ITEM FOLLOWUP	YES	NO	ACTION	
			REQUIRED	COMPLETED
- Cap and Cover				
- Settlement	___	___	___	___
- Ponding of Water	___	___	___	___
- Cracking	___	___	___	___
- Visible signs of erosion	___	___	___	___
- East Embankment				
- Settlement or bulges	___	___	___	___
- Erosion or washout	___	___	___	___
- Cracking	___	___	___	___
- Slopes West of Station B				
- Erosion	___	___	___	___
- Settlement or bulges	___	___	___	___
- Slides	___	___	___	___
- Cracking	___	___	___	___
- Drainage and Diversion System Maintenance				
- Visible signs of erosion or washout	___	___	___	___
- Ponding of water	___	___	___	___
- Debris accumulation	___	___	___	___
- Trees or bushes growing	___	___	___	___
- Greater than 6" sediment accumulation	___	___	___	___
- Damage to Geomembrane	___	___	___	___
- Fence				
- Working gates and locks	___	___	___	___
- Condition of posts and barbed wire	___	___	___	___

FIGURE 1

STATION B SURFACE IMPOUNDMENT INSPECTION FORM  
(page 2 of 2)

Name of Inspector \_\_\_\_\_ Date \_\_\_\_\_  
 Is this a scheduled inspection? \_\_\_\_\_

INSPECTION ITEM	YES	NO	ACTION REQUIRED	FOLLOWUP COMPLETED
- Signs (should be located around the perimeter of the fence; one at each access point and no more than 200 foot intervals thereafter, there should be a total of 23 signs)				
- Presence of	_____	_____	_____	_____
- Legibility	_____	_____	_____	_____
- Miscellaneous				
- Leachate alarm	_____	_____	_____	_____
- Activated	_____	_____	_____	_____
- Tested	_____	_____	_____	_____
- Liquid accumulation in the sumps associated with the leachate collection system	_____	_____	_____	_____
- Liquid accumulation in the sumps associated with the leak detection system	_____	_____	_____	_____

COMMENTS \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Inspector Signature \_\_\_\_\_

Authorized person responsible for post-closure maintenance to review report and sign below.

Name (print) \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

FIGURE 2.

STATION E WASTE PILE INSPECTION FORM  
(page 1 of 2)

Name of Inspector \_\_\_\_\_ Date \_\_\_\_\_  
 Is this a scheduled inspection? \_\_\_\_\_

INSPECTION ITEM	YES	NO	ACTION		FOLLOWUP
			REQUIRED	COMPLETED	
- Cap and Cover					
- Settlement					
- Ponding of Water					
- Cracking					
- Visible signs of erosion					
- Vegetation					
- Drainage and Diversion System Maintenance					
- Visible signs of erosion or washout					
- Ponding of water					
- Debris accumulation					
- Trees or bushes growing					
- Fence					
- Working gates and locks					
- Condition of posts and barbed wire					
- Signs (should be located around the perimeter of the fence; one at each access point and no more than 200 foot intervals thereafter, there should be a total of 13 signs)					
- Presence of					
- Legibility					

STATION "E" SURFACE IMPOUNDMENTS INSPECTION FORM

(page 2 of 2)

Name of Inspector \_\_\_\_\_ Date \_\_\_\_\_

Is this a schedule inspection? \_\_\_\_\_

INSPECTION ITEM	<u>ACTION FOLLOWUP</u>			
	YES	NO	REQUIRED	COMPLETED
Miscellaneous				
Infringement of any excavation within 2:1 slope outside of security fence	_____	_____	_____	_____

COMMENTS

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector Signature \_\_\_\_\_

Authorized person responsible for post-closure maintenance to review report and sign below:

Name (print) \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

FIGURE 3  
MONITORING WELLS INSPECTION FORM

Name of Inspector: \_\_\_\_\_

Date: \_\_\_\_\_

Well No.	Locked Upon Arrival	Damage to Cap or Riser	Damage to Surface Seal	Blockage Within Well	Unusual Pumping Conditions	Sediment Accumulation	Comments
MW-1							
MW-2A							
MW-2B							
MW-2C							
MW-3							
MW-3A							
87-1							
87-2							
87-3							
87-4							
87-5							
87-6							
87-7							
87-8							

## ATTACHMENT 6

### PERSONNEL TRAINING PLAN

#### Introduction

Stations B and E are certified closed hazardous waste landfills in post closure. The closures of both units were designed to isolate the wastes from the environment, to provide long term service, and to minimize post closure care. Permanently assigned personnel are not required or used. Personnel from EVRAZ Environmental Department or certified hazardous waste contractors are periodically assigned to complete specific tasks. Periodic inspections, leachate pumping, groundwater monitoring, and maintenance activities are required. Temporarily assigned personnel are required to receive training s specified by the Environmental Protection Agency (EPA), the Department of Transportation (DOT), and the Occupational Safety and Health Administration (OSHA). The training shall consist of Stations B and E site specific instruction.

#### EPA Training

Stations B and E personnel shall receive classroom instruction and on the job training designed specifically for Stations B and E. Specific instruction will be given so that personnel will perform their duties in a way that ensures compliance with 40 CFR 264.16.

The Stations B and E training is added to other requirements and consists of the following specific topics:

1. Stations B and E layout and hazards including the nature and characteristics of hazardous wastes and materials;
2. Overview of Stations B and E operations, safety rules, administrative procedures, training requirements, and trainee's job functions;
3. Stations B and E walk through to point out areas of potential risk, risk identification, and alarm light locations;
4. Inspection procedures including cap integrity, fence condition, run-on/run-off water control; proper use of applicable inspection forms, and initiating repair procedures;
5. Leachate pumping including waste transfer and response to spills;
6. Groundwater monitoring including waste transfer and response to spills;
7. Mobile communication, and;
8. Emergency procedures as specified in the Contingency Plan. (NOTE: Emergency equipment is not stored on site because of the closure design and lack of daily operations.)

Training will be directed by a person trained in hazardous waste management procedures.

Training must be completed within six months after their date of employment or work assignment to Stations B and E. Employees shall not work in unsupervised positions until they have completed the above training requirements.

Refresher training is provided annually.

Records specified by 40 CFR 264.15(d) are maintained in Environmental Department offices.

#### DOT and OSHA Training

Personnel working at Stations B and E shall receive applicable training as specified by 49 CFR172.704 and 29 CFR 1910.120

#### Contract Personnel

Contract personnel shall be certified for hazardous waste operations. Personnel shall also receive Stations B and E site specific instruction. Contract personnel shall comply with all requirements of the Stations B and E Personnel Training Plan.