

PERMIT ATTACHMENT G CLOSURE PLAN

G.1 INTRODUCTION

The Advanced Chemical Treatment LLC (the Facility, ACT) operates as a treatment and storage facility for hazardous waste. The hazardous waste management unit (HWMU) and ancillary waste management facilities must be closed in accordance with the closure requirements of 40 CFR §264.111 through §264.115 and the procedures described in this Permit Attachment (G).

When ACT decides to close the Facility, notices shall be sent to generators employing ACT's services to inform them of the pending discontinuation of receiving their hazardous waste and materials. NMED will be informed at least 60 days prior to the date that final closure activities are expected to begin. All hazardous waste shall be removed from the site within 90 days of receipt of the final volume of waste and the closure activities shall be completed within 180 days.

Closure of the facility shall be carried out in accordance with the steps outlined in this plan. Implementation of this plan is intended to minimize the need for further maintenance and control, minimize, or eliminate the post-closure escape of hazardous wastes, hazardous constituents, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. The procedures to achieve these objectives, which shall meet the closure performance standard in 40 CFR § 264.111, are described below.

This closure plan identifies the steps necessary to conduct facility closure. Amendments to the closure plan shall be conducted in accordance with 40 CFR § 264.112(c)(2). Closure shall be implemented in accordance with the schedule included in Part 5 of this Permit.

The facility subject to closure comprises the following 7 structures, which are shown on Figure 6 (Facility Floor Plan and Storage Areas) in Permit Attachment M (Figures).

- a. One 23,000 square feet warehouse and rooms, bathrooms, loading/unloading dock, a back dock, two rainwater containment areas, and six container storage areas (A, B, C, D, E, F) used for hazardous waste container and drum storage.
- b. One Hazardous Waste Consolidation area on the West Dock.
- c. Operations Dock.
- d. One enclosed storage area used for flammable storage (Area F).
- e. One building with administrative offices and RCRA specified warehousing.
- f. One Fuel Blending location on the South end of the East Dock Parking Area.

The maximum quantity of waste to be blended varies depending on the waste type and waste inventory. The maximum quantities ACT is allowed to blend are as follows:

- Bulk liquids (tanker truck) – 5,500 gallons per day. Treatment of hazardous waste in the other containers shall not be done the same day as the tanker truck to avoid exceeding the daily maximum amount allowed for treatment, which is 5,500 gallons per day.
- Bulk liquids (non-tanker) – 330 gallons per Container per day.
- Bulk tote container (i.e., 275 gallons) per day.

- 55-gallon drums, not to exceed 5,500 gallons per day for treatment.

The fuel and waste consolidation area are built upon a concrete base and contains a sloped loading dock and a series of connected containment sumps in each bay, providing approximately 1,400 gallons of secondary containment shown on Figure 7 (Facility Secondary Containment), Permit Attachment L (Figures).

The operating capacity of Storage rooms A through F is specified in Permit Attachment J (Hazardous Waste Management Units), Table J-1.1 (Hazardous Waste Storage (S01) and Treatment (T04) Units at the Facility). It is anticipated that the Facility will be clean closed. The Permittees shall attain clean closure of the Facility by meeting the closure performance standards specified at Permit Part 5 (Closure Requirements for the Facility), Section 5.2.1 (Criteria for Clean Closure). Final closure of the Facility will be deemed complete when the New Mexico Environment Department (Department) approves the Closure Report, and the certification required under Permit Part 5, Section 5.10 (Closure Report and Certification), and Section G.6 of this Closure Plan.

G.2 CLOSURE PROCESS

The Permittee shall, in accordance with Permit Part 5, Section 5.3.1 (Notification of Closure), notify the Department in writing that they have initiated closure at the Facility.

The Permittee shall, in accordance with Permit Part 5, Section 5.3.2 (Time Allowed for Closure) and Table 5.1 (Closure Schedule), complete all Facility closure activities.

The Permittee shall, in accordance with Permit Part 5, Section 5.3.4 (Removal of Waste), remove all hazardous waste from the Facility no later than 90 days after initiating closure at the hazardous waste management areas of the facility, and shall also remove any solid waste that adversely interferes with closure activities. The inventories of waste will be transported by authorized transporters to an off-site permitted hazardous waste treatment or disposal facility, recycler, or reclaimer, in accordance with all applicable state and federal regulations.

The Permittee shall, in accordance with Permit Section 5.3.5 (Records Review and Structural Assessment), conduct a records review and structural assessment of the Facility to evaluate whether any spills or releases have occurred at the facility. In addition, a structural assessment will be performed to identify areas of release or potential lapses in integrity to the hazardous waste management facility structures or containment areas. These evaluations will be used to determine sampling locations to verify the presence or absence of releases. The Permittee shall submit the review and assessment to the NMED in the form of a written report in accordance with Section 5.3.5 of the Permit (Records Review and Structural Assessment).

The Permittee shall, in accordance with Part 5, Permit Section 5.3.6 (Decontamination and Removal of Structures and Equipment), decontaminate or remove all contaminated structures and equipment from the Facility.

The Permittee shall, in accordance with Permit Section 5.3.7 (Verification Sampling of Structures and Equipment) and Section G.2.1 (Decontamination), perform decontamination verification sampling of all structures and equipment at the Facility that were required to be decontaminated.

The Permittee shall, in accordance with Permit Section 5.3.8 (Verification Sampling of Structures and Equipment) and Section G.2.1 (Decontamination), sample soils and base materials (*e.g.*, gravel) associated with the Facility to quantify constituents of concern associated with any releases of hazardous wastes.

The Permittee shall ensure that soils and base materials at the Facility contaminated with constituents of concern that pose an unacceptable risk to human health (based on the closure criteria in Permit Section 5.2.1(Criteria for Clean Closure) or the environment as specified in Permit Section 5.3.8 (Sampling of Soil and Base Material) are removed from the Facility in accordance with Permit Part 5, Section 5.3.9 (Removal of Contaminated Soil or Base Materials). The complete removal shall be verified by the Permittee in accordance with Permit Section 5.3.9 (Removal of Contaminated Soil or Base Materials).

If the contaminated soil or other environmental media cannot be removed because it would be impracticable, the soil or other environmental media shall be subject to corrective action under Permit Part 7 (Corrective Action).

G.2.1 Decontamination

After the inventory of the hazardous waste has been removed, ACT will visually inspect the surfaces of hazardous waste management areas and other structures including the Loading Dock Parking Area, the Truck Loading docks, and the Operation Dock, the Fuel and Waste Consolidation Area (FWCA), the Rainwater and Runoff Containment Areas, and shall remove any visible residues using dry methods as appropriate. Dry methods include, but are not limited to shovels, brooms, brushes, etc. Residues will be characterized and transported offsite in accordance with applicable solid or hazardous waste management regulations. The FWCA is included in the same footprint as the Loading Dock Parking Area and south Loading Dock. The locations of these areas and the HWMUs are depicted on closure sample location Figure 8 in Permit Attachment M (Figures).

Since hazardous waste is not managed in the facility offices or bathrooms, the office and bathrooms will not be subject to the decontamination procedures described in this Closure Plan.

After dry decontamination, a visual surface assessment will be performed by a professional engineer registered in the State of New Mexico. The surface will be inspected for cracks, fissures, gaps, deterioration, and staining. The certifying engineer shall determine if temporary sealing of containment areas should occur before steam pressure washing to prevent any migration of hazardous waste residues and assist in locating additional boring and/or sampling locations.

After any necessary temporary sealing, the surfaces will be decontaminated using a high-pressure detergent wash with a second-stage water rinse. Alternatively, steam cleaning or other appropriate cleaning techniques like mops or sponges may also be used. Walls (ranging in height from 17 up to 20 feet) and doors will be decontaminated first, followed next by shelving, followed lastly by the containment system/floor (in other words, decontaminate from higher surfaces to lower surfaces). Wash water from the decontamination will be containerized in a vacuum truck and/or drums and managed as hazardous waste for offsite disposal. Other waste generated during the decontamination such as PPE, temporary berms, or other disposable equipment will also be

managed as hazardous waste and shipped offsite by an authorized transporter for disposal. A final rinse will occur after the first two rinses and will be considered the testing rinse. The volume of the testing rinse will be minimized to avoid dilution of the sample water. The volume of the testing rinse will not exceed 10% of the volume of the secondary containment.

G.3 SAMPLING AND ANALYSIS PLAN

This sampling and analysis plan identifies: 1) the constituents of concern at the Facility, 2) the locations where sampling shall occur, 3) the laboratory analytical methods that shall be employed to quantify analyte concentration in samples, and 4) the quality assurance procedures to be utilized during closure.

The constituents of concern at the Facility shall be determined in accordance with Permit Sections 5.3.5 (Records Review and Structural Assessment) and 5.5(1) (*The list of Constituents of Concern*). A preliminary list of groups of constituents is presented in Table G.1-1 of this Permit Attachment; the list shall be modified at the time of closure, if necessary, in accordance with Permit Section 5.3.5 (Records Review and Structural Assessment).

The Permittee shall collect wet-wipe and soil samples and perform sample quality assurance procedures in accordance with Permit Sections 5.3.10.1 (Wet-Wipe Samples), 5.3.10.2 (Soil Samples), and 5.3.10.3 (Quality Assurance).

The Permittee shall sample soils and base materials at the applicable locations identified at Permit Section 5.3.8 (Sampling of Soil and Base Material). Closure soil sample locations are identified on Figure 8 (Closure Sample Locations), Permit Attachment M (Figures). Because of the length of the two storm water catchment ponds, the Permittee shall also collect three samples at the specified depths at each of three locations within each pond, one sample from the east and one from the west ends and one sample from the middle of the pond.

The Permittee shall sample structures and equipment at the applicable locations identified in accordance with Permit Section 5.3.7 (Verification Sampling of Structures and Equipment).

The wet-wipe sampling locations to verify decontamination in the storage rooms A through F are described in Part 5, Section 5.3.7 (Verification Sampling of Structures and Equipment).

Sampling locations may vary from those described in Section 5.3.7 (Verification Sampling of Structures and Equipment) of this Permit due to conditions at closure. Sampling locations may also change as a result of amendments to this closure plan, such as amendments required under Permit Part 5, Section 5.6 (Amendment to the Closure Plan).

G.3.1 Decontamination Verification

To confirm that decontamination is complete, the test rinse from each HWMU, the Fuel and Waste Consolidation/Loading Dock Parking Area, the Truck Loading Docks, and the Operation Dock will be sampled and analyzed. Additionally, as required by NMED, wipe tests will be conducted on concrete

surfaces within the Warehouse Areas. The closure sample locations are depicted on Figure 8, Permit Attachment M (Figures).

G.3.1.1 Rinsate Samples

A representative sample of the test rinsate from each area shall be collected following the procedures described in Section G.3.7.

The samples will be analyzed for:

- Total Metals using SW-846 Method 5010 with appropriate Series 7000 individual
- Metal Methods
- Volatile Organics using SW-846 Method 8260
- Semi-Volatile Organics using SW-846 Method 8270
- PCBs using SW-846 Method 8080A

The results will be evaluated by the certifying engineer to verify decontamination effectiveness or recommend appropriate future activities. Decontamination will be considered complete when the concentrations are below appropriate risk-based standards or screening levels.

G.3.1.2 Wipe Samples

After decontamination, wipe samples shall be collected from the concrete flooring, walls and doors of each warehouse /hazardous waste storage and treatment area, and the Fuel and Waste Consolidation Area as depicted on Figure 8, Permit Attachment M (Figures). The wipe samples shall be collected in accordance with ASTM Guide1728, or other method approved by NMED. The number of wipe samples shall be 1 sample per 400 square feet. Wipe samples shall be collected from low points within areas E and F as shown on Figure 8. Two wipe samples shall also be collected from the Sump at the Loading Dock. Sample locations may be adjusted to address any areas of staining observed. This would be described in an amended Closure Plan approved by NMED.

The wipe samples shall be analyzed for:

- Total Metals using EPA SW-846 Method 5010 and appropriate Series 7000 individual Metals Methods
- Volatile Organics using EPA SW-846 Method 8260
- Semi-Volatile Organics using EPA SW-846 Method 8270
- PCBs using EPA SW-846 Method 8080A

G.3.2 Soil Sampling

Soil samples will be collected at closure to verify the presence/absence of contamination beneath the facility and in the vicinity of the fuel and waste blending or consolidation area/Loading Dock Parking Area, the Truck Loading Docks, and the Operation Dock. Soil samples will also be collected from the locations north and south of the warehouse which houses Rooms A through G - the hazardous waste management areas. The potential locations of the soil samples are shown

on Figure 8, Permit Attachment M (Figures). The soil sampling locations may be adjusted should the structural assessment conducted by the certifying engineer indicate potential lapses of integrity.

The soil samples will be collected underneath concrete areas using a coring device to access the underlying native soil. Once the concrete core is removed from each soil sampling location, soil sampling equipment (e.g., a hand auger or similar sampling device) will be advanced to native soil beneath the concrete. Native soil will be placed into appropriate laboratory-supplied sample containers suitable for the intended analyses. Sample containers will be labeled and placed on ice in a sample cooler.

The samples will be analyzed for the following parameters:

- Total Metals using EPA SW-846 Method 5010 and appropriate Series 7000 individual Metals Methods
- Volatile Organics using EPA SW-846 Method 8260
- Semi-Volatile Organics using EPA SW-846 Method 8270
- PCBs using EPA SW-846 Method 8080A
- pH using SW-846 Method 9040C or 9041.

The results will be evaluated by the certifying engineer in the closure report to verify decontamination effectiveness or recommend appropriate future activities. If any hazardous constituents are detected at concentrations above NMED risk-based standards or screening levels, a workplan will be prepared to determine the extent of the contamination and possible remedial actions.

G.3.3 Retention Pond Sampling

The Facility is designed to allow no run-on from nearby streets or property. Run-off is limited because the property is sloped so that rainwater remains on the property. All the rainwater that enters the property is collected in two retention ponds known as the Rainwater and Run-off Containment Ponds. Both ponds are located on the southern part of the property. During closure activities, three sediment samples shall be collected from each pond, that includes two samples from the end of each pond and one sample from the center of each pond as shown on Figure 8 in Permit Attachment M, (Figures).

The sediment samples shall be analyzed for Toxicity Characteristic Leaching Procedure metals using SW-846 Method 1311 to determine the leachable concentrations of the 40 constituents listed in 40 CFR §261.24 – Table 1. The results will be used to determine whether the retention ponds have been contaminated with hazardous waste or hazardous constituents.

G.3.4 Background Soil Sampling

Background soil sample locations are shown on Figure 8 (Closure Sample Locations) in Permit Attachment M (Figures) The locations of background samples may be modified at closure in an amended closure plan approved by NMED Representative background samples will be taken from areas not affected by waste management activities.

The samples will be analyzed for the following parameters:

- Total Metals using EPA SW-846 Method 5010 and appropriate Series 7000 individual Metals Methods
- Volatile Organics using EPA SW-846 Method 8260
- Semi-Volatile Organics using EPA SW-846 Method 8270
- PCBs using EPA SW-846 Method 8080A
- pH using SW-846 Method 9040C or 9041.

The analytical results of the background samples will be evaluated by ACT and included in the closure report. If concentrations of the hazardous constituents are found to be present above residential risk-based levels or background levels, a workplan to determine the extent of the contamination and the proposal for remedial action will be developed and submitted to NMED for approval.

G.3.5 Soil Gas Survey

G.3.5.1 Vapor Intrusion Assessment

In order to establish whether a vapor intrusion pathway is complete within select building structures, a sub-slab soil gas investigation will be conducted. The vapor intrusion investigation will focus on storage areas C, D, E, and F. The total area of these four hazardous waste storage areas is approximately 25,000 square feet (sq. ft). Based on this square footage, 10 sub-slab samples will be collected. The exact location of the 10 sub-slab samples will be based on field decisions once onsite. Five sub-slab samples will be installed within areas C and, with five additional sub-slab samples collected from storage areas E and F. Details of the sub-slab implants and associated sampling are presented below. The soil gas survey samples will be analyzed for the analytes in Table L-1 below on the next page.

Sub-Slab Implant Installation

The sub-slab implants will be installed using a battery-powered hammer drill equipped with a 0.75-inch diameter drill bit. The drill bit will be used to penetrate the entire concrete slab thickness. An “air stone” attached to nylon tubing will be used in the construction of the sub-slab implants. Clean quartz sand will be placed around the air stone, and the remaining borehole will be sealed with hydrated bentonite. It is essential that the entire thickness of the concrete slab be sealed with hydrated bentonite to ensure sample integrity and prevent any chemicals that may be sorbed into the concrete from affecting the sample results. After collecting the soil gas sample, the tubing will be removed from the borehole, and the concrete slab will be patched with concrete. A minimum equilibration time of 2 hours will be allowed after installation before sampling.

Slab Samples

The sub-slab samples will be collected from the installed implants no sooner than 2 hours after the implants are installed. Before collecting the sub-slab samples, a helium leak and a secondary leak (shut-in) test will be performed on the summa canisters and the associated sampling apparatus. The sub-slab samples will be collected in 400 ml batch-certified summa canisters with 200 ml/min

Table G-1: Analyte List for Vapor Intrusion Assessment

Page 127 of 167

Data Analysis

The results of the sub-slab samples will be evaluated using the EPA Vapor intrusion screening level calculator (VISL) utilizing the New Mexico specific total risk values of 10^{-5} for carcinogens and a Hazard Index (HI) of 1.0 for non-carcinogenic substances as cleanup goals (See Table L-1 in Permit Attachment L).

G.3.6 Loading Dock Soil Sampling

Soil samples shall be collected at closure in the vicinity of the loading docks to evaluate for the presence of contamination. The SAP shall be updated based on the records review and structural assessment to target areas where there is damage to the pavement or concrete or evidence (e.g., staining) or a record of a release. At a minimum, three samples shall be collected in front of each loading dock from the native soils directly underlying the subgrade beneath the concrete or pavement. The soil sampling shall be conducted in accordance with the methods and procedures included in Permit Section 7.10. The soil samples shall be submitted to a chemical analytical laboratory for analysis for all constituents historically managed at the Facility. If constituents are present above residential risk-based levels, a workplan must be developed, and submitted to NMED for review approval, to determine the extent of contamination and the appropriate remedial action. Samples will be handled in accordance with the methods described at Permit Section 8.2.

The Permittees shall utilize the laboratory analytical methods, the sample preservation criteria, and the sample holding times as specified in Table G.1-1, as the information in the table may be updated via a closure plan amendment. The Permittee shall abide with the requirements for chemical analyses at laboratories as specified at Permit Part 7.

The Permittee shall document field activities associated with closure as specified at Permit Part 7, Section 8.2.17.

Table G.1-1 Sampling Requirements ¹			
Parameter	Laboratory Method(s)	Preservation	Holding Time
Metals (Total: Ag, As, Ba, Be, Cd, Cr, Hg, Ni, Pb, Sb, Se, and Tl)	6010/6020/7470/7471	None	6 months (except Hg, 28 days)
VOCs	8260	Headspace free, Cool to 4°C	14 days
SVOCs	8270	Cool to 4°C	14 days
Dioxin/Furan Congeners	8280, 8290	Place in dark and cool to 4°C	30 days
PCBs	8080/8082	Cool to 4°C	14 days
Herbicides	8150/8151	Cool to 4°C	14 days
Cyanide	9010/9012	Cool to 4°C	14 days

¹Methods are EPA SW-846 Methods, as revised and updated.

G.3.7 Sample Collection, Handling, and Quality Control

Representative samples of clean and used decontamination wash water and used decontamination rinse water will be collected using appropriate equipment. Sample collection methods for structural surfaces and equipment will include grid sampling, chipping, coring, drilling or wipe tests, as appropriate. The Sampling locations are indicated on Figure 8, Permit Attachment M (Figures). Samples will be collected, stored, and preserved in accordance with established and applicable procedures (e.g., EPA, ASTM). The samples will be analyzed for the parameters listed in Sections G.3.1 through G.3.5.

In order to collect accurate and defensible data of high quality, ACT LLC or the certifying engineer will evaluate accuracy, precision, representativeness, and completeness of the data. Field and laboratory Quality Control samples will be analyzed and evaluated as discussed in Section G.3.7.2. This procedure for determining the quality and usability of analytical data will be summarized in a data validation report regarding the overall quality of the data and the resulting data qualifiers. Data validation information will be submitted to NMED in the final closure report.

G.3.7.1 Sample Documentation and Custody

In order to ensure the integrity of samples from the time of collection through the reporting of analytical results, sample collection, handling, and custody will be documented in writing. The primary elements in the documentation of samples will include assignment of unique sample identification numbers, use of sample labels, use of custody tape, and documentation on Analysis Request/Chain-of-Custody Forms.

Each sample will be assigned a unique identification number. Labels will be completed with waterproof ink prior to sample collection to minimize container handling. Sample labels will include the following information:

- Name of sampler.
- Date and time of sample collection.
- Sample identification number.
- Sample matrix and how collected (i.e., grab, composite).
- Sample Preservation method; and
- Analysis required.

G.3.7.2 Laboratory Analysis and Quality Control (QC)

The analytical laboratory will have a written quality assurance (QA) plan and standard operating procedures in place to ensure sample preparation and analysis are performed properly and that results are of the appropriate and documented quality to ensure that objectives are met. The laboratory will perform the following QC checks with each batch of samples:

- **Laboratory control sample (LCS):** consists of a control matrix (e.g., deionized water) spiked with known concentrations of analytes representative of the target analytes. LCSs shall be prepared and analyzed for each analytical procedure performed. LCSs shall

be analyzed with each analytical batch containing environmental samples to determine accuracy of data. The laboratory shall also evaluate the precision of the data by analyzing twice either the environmental samples or the LCSs and calculating the relative percent difference between corresponding results.

- **Method blank samples:** Method blank samples shall be used to check for contamination in the laboratory during sample preparation and analysis. Method blank samples will be prepared and analyzed with each analytical batch.

Trip blank samples: trip blank samples shall be used to check for contamination that may be introduced during shipping and field handling procedures. Trip blanks shall be provided by the laboratory and shall consist of analyte-free water that will travel with the sample collection bottles from the laboratory to the field and then back to the laboratory without being opened until analysis by the laboratory.

Quality Assurance and Quality Control (QA/QC) samples will be collected as follows:

- One duplicate shall be collected per 20 samples for analysis.
- **Matrix Spike:** An aliquot of sample shall be fortified with known concentrations of target analytes, the sample prepared and analyzed, and the results compared to the results of a split non-fortified sample to determine and document the bias of the matrix on the analytical method.
- **Matrix Duplicate:** Split duplicates of a sample will be fortified with identical concentrations of target analytes and analyzed. The results will be used to document the precision and bias of a method in the sample matrix.

G.3.7.3 Sample Preservation, Handling, and Shipment Preparation

Container, preservative and holding time for each analytical parameter will follow EPA guidelines or equivalent methods acceptable to NMED. Sample shipment will be made in accordance with the U.S. Department of Transportation and International Air Transport Association shipping requirements, as applicable. Prior to shipment, sample collection documentation will be verified, and any errors corrected.

G.3.7.4 Field Quality Control Sampling

Field quality control will be accomplished by preparing blank and duplicate samples. Blanks and duplicate samples will be utilized in assessing any contamination introduced during sample collection and handling to analyze precision, and to check performance of the contract laboratory. Equipment rinsate blanks will be collected at a frequency of one per day for each piece of non-disposable sampling equipment, if any reusable equipment is used, to determine if cross-contamination has occurred. One in every twenty clean and used wash water and used rinse water samples collected will be submitted in duplicate for analysis and determination of precision.

The field blanks and duplicates will be treated as separate samples and submitted blind to the contract laboratory.

G.3.7.5 Analysis Request/Chain-of-Custody Form

In order to document the integrity of samples from collection to analysis, sample possession will be recorded on an Analysis Request/Chain-of-Custody Form. A sample is in custody if one or more of the following criteria apply:

- It's in an authorized person's possession or view, or
- Secured to prevent tampering; and
- Secured in an area restricted to authorized personnel.

In addition to other information such as facility and laboratory contact information and any special instructions, the Analysis Request/Chain-of-Custody Form will include the same information as that on the sample(s) label(s), will be initiated at the point of sample collection and will be kept with the sample(s) during transfer to the laboratory. The Analysis Request/Chain-of-Custody procedures will follow EPA guidance or equivalent methods acceptable to NMED.

G.3.7.6 Sampling Equipment Decontamination Procedures

In order to minimize the potential for cross contamination between samples, disposable sampling equipment will be used to the extent possible. If reusable sampling equipment is employed, it will be decontaminated as described above for tools in Section G.2.1 of this Closure Plan prior to being reused.

G.3.7.7 Waste Management

Waste will be generated through implementation of the sampling procedures. The waste will primarily be miscellaneous solid, nonhazardous wastes such as gloves, sample container packaging, and label adhesive backing. All waste generated during closure activities shall be managed in accordance with Federal and State regulations.

G.3.7.8 Data Management, Evaluation, and Reporting

Initial data reduction and validation will be done by the laboratory contracted to analyze the samples. The laboratory will report the data in accordance with their internal QC requirements. Duplicate and spiked laboratory control samples will be analyzed by the laboratory for indicators of precision and accuracy, with results reported as relative percent difference and percent recovered, respectively. Acceptance criteria for accuracy and precision will be included in the analytical report from the laboratory.

Summary analytical and laboratory QC data will be transmitted to ACT LLC or the certifying engineer by the contract laboratory. The analytical report will be in electronic and hard copy formats. The laboratory will archive all raw data, notes, and bench sheets in a manner allowing retrieval upon request by ACT. These records will include instrument tuning and calibration records, batch QC sample data, sample tracking and control documentation, raw analytical sample data, and analytical results.

Records associated with sampling and analysis, including field documentation, chains of custody, laboratory analytical results, data validation reports, and technical data evaluations will be maintained at the facility. ACT will comply with the recordkeeping provisions of 40 CFR §264.74 concerning the availability, retention, and disposition of such records. Upon completion of all closure sampling activities and receipt of analytical report showing that results are below TCLP standards, a Closure Report signed and certified by a professional engineer registered in the State of New Mexico will be prepared and submitted to NMED.

G.4 AMENDMENT TO THIS CLOSURE PLAN

The Permittee shall submit permit modification requests to amend this Closure Plan, if needed, in accordance with Permit Part 5, Section 5.6.

G.5 WASTES GENERATED FROM CLOSURE ACTIVITIES

The Permittee shall ensure that waste (*e.g.*, demolition debris and contaminated soil) generated from closure of the Facility is managed in compliance with all applicable state, federal, and local requirements (*see* 40 CFR § 264.114).

G.6 CLOSURE REPORT AND CERTIFICATION

No later than 60 days after completing closure of the Facility, the Permittee shall in accordance with Permit Section 5.10 submit a closure report to the Department for review and approval.