

PERMIT ATTACHMENT 7

CLOSURE PLAN FOR THE HAZARDOUS WASTE STORAGE FACILITY

7.0 CLOSURE PLAN

The Closure Plan for the HWSF is provided in accordance with 270.14 (b) (13) incorporating 264.112, that meets the requirements of 40 CFR Part 264 Subpart G and 40 CFR §264.178. The Closure Plan identifies the steps necessary to completely close the HWSF at the end of its intended operations.

7.1. Amendments

The Closure Plan will be amended whenever a change in operating plans or facility design occurs that may affect HWSF closure. Amendments to the closure plan must comply with the requirements of 40 CFR §270.42. Amendments to the Closure Plan may be made at any time during the active life of the facility. In addition, an amendment will be submitted no later than 60 days after an unexpected event has occurred affecting the Closure Plan or, if an unexpected event occurs during the final closure period, no later than 30 days after the unexpected event. No later than 60 days prior to the final receipt of waste at the HWSF, the Permittee shall submit an amended closure plan that provides updated proposed sampling and other activities associated with closure and including proposed soil sampling locations outside of the buildings in loading/unloading areas as well as any areas discussed in Attachment 7 Section 7.3 below.

7.2. Records

A copy of the Closure Plan, and its revisions, shall be kept at the Facility until the closure of the facility is complete, certified, and approved by NMED. At the start of closure, the Permittee shall conduct a records review to identify all incidents where spills or releases have occurred during the history of operations of the HWSF. The records review shall include identification of all waste stored at the HWSF including nonhazardous wastes and all hazardous constituents or other chemicals historically stored within the facility boundary.

7.3. Disposal of Containers, Decontamination of Equipment and Confirmation Sampling

At the time of closure, all containers of hazardous waste remaining in storage shall be removed and transported off-site to a permitted treatment or disposal facility.

After all containers are removed, the facility shall be inspected to identify stains, structural damage or any other indications of releases or potential migration pathways to the environment. The interior of the hazardous waste storage buildings, the containment area in Building 22895, and all operating equipment shall be steam-cleaned. Any concrete stains that indicate the presence of surface contamination in the containment area in Building 22895 shall be removed, using technology deemed appropriate at the time of closure. This may include scraping, chipping, washing, and/or bioremediation. Sampling of building materials, loading and unloading areas, and beneath the buildings, if necessary, shall be conducted where evidence of cracks or other structural damage indicates that contaminants may have migrated from the building. The sampling methods shall be appropriate for the type of materials being sampled and analytical suite for any samples obtained from the structures or underlying soils shall be based on the chemicals identified in the records review. All sampling methods (e.g., chip sampling, swipe sampling, soil sampling) and analytical methods must be approved by NMED prior to implementation.

The storage buildings may be disposed of or reused. If they are reused, they shall be verified to be free of contamination by rinsing interior surfaces including the walls, ceiling, floor and floor grating with high pressure water or steam and subsequent collection of swipe samples from the building floors and walls. The swipe samples shall be analyzed based on the chemicals identified in the records review. The results shall be compared to screening levels identified in NMED guidance.

If staining or damage indicates movement of hazardous waste components into the concrete, chip samples will be obtained for chemical analysis. The floor at the location of the staining or damage will be cored to evaluate the extent of the infiltration. Should this portion also show transport of hazardous waste

constituents into the subfloor, samples of the soil beneath the main building will be obtained beneath the locations where infiltration or migration beneath the flooring is observed. Identification of contamination in the concrete subfloor of the containment area may require the removal and appropriate disposal of the contaminated concrete as hazardous waste and removal of underlying soils.

If contamination is identified in the soil beneath the containment area of Building 22895, the NMED will be notified. The Permittee will submit an amendment to the closure plan to propose investigation of the nature and extent of the contamination in accordance with 40 CFR §264.112 and 40 CFR §270.42. The amended Closure Plan shall specify the number, locations and types of samples to be collected, the analyses to be performed and the schedule for implementing the plan and subsequent reporting.

Surface soil sampling (0-1 foot below ground surface or first encounter with native soil below constructed surface) shall be conducted in all loading/unloading areas and any location of a release outside of the buildings identified in the records review. The soil sampling locations shall be proposed in the updated closure plan required by Section 7.5 below.

All miscellaneous equipment used in cleanup and decontamination of the storage facility (e.g., brushes, mops, buckets, protective clothing, pump hose, investigation derived waste) will be managed as hazardous waste.

7.4. Closure Performance Standard

The Closure Plan will comply with the performance standards set forth in Permit Section 2.19, 40 CFR §264.111 and in accordance with the most updated NMED risk assessment guidance. All closure investigation and remediation activities shall be conducted in accordance with the methods and procedures described in Permit Section 7.

7.5. Schedule for Closure

Closure will be accomplished according to the schedule contained in 40 CFR §264.113. Guidelines for the closure schedule activity durations (in days) are as follows:

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| 1. Notify the NMED of intent to close facility. | 90 days prior to anticipated final receipt of waste |
| 2. Initiate records review | 90 days prior to anticipated final receipt of waste |
| 3. Submit updated closure plan | 60 days prior to anticipated final receipt of waste |
| 4. Receive final volume of hazardous waste from WSMR. | 0 days |
| 5. Removal of all hazardous waste from storage facility complete. | 90 days |
| 6. Completion of decontamination | 120 days |
| 7. Completion of confirmation sampling | 150 days |
| 8. Closure report and certification submitted to the NMED. | 210 days |

If closure activities cannot be completed within the proposed timeframes, the Permittee shall request an extension in accordance with Permit Part 1 Section 17, 40 CFR §264.113 and 40 CFR §270.42.

7.6. Closure Certification and Closure Report

Certification that the facility was closed in accordance with the approved plan and 40 CFR §264.115 shall be submitted to NMED no later than 60 days after completion of closure as specified by 40 CFR §264.115. A closure report shall be submitted concurrently with the certification for NMED review and approval. The closure report shall be prepared in accordance with the requirements of Permit Section 9.3.

7.7. Post Closure

Should the Permittee be unable to clean close the HWSF, the Permittee shall submit a post-closure plan as a permit modification in accordance with 40 CFR §270.42(c) that proposes all activities necessary to restrict access, prevent exposure or the release of hazardous waste or hazardous constituents and monitor, as necessary, the HWSF to protect human health and the environment.