

HAZARDOUS WASTE
OPERATING RENEWAL PERMIT

U.S. ARMY; FORT POLK

LA0214022725-OP-RN-1
AI#8994//PER20040001

RECORD CENTER COPY

**PUBLIC
PARTICIPATION**

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
UNITED STATES ARMY-FORT POLK
EXPLOSIVES ORDNANCE DISPOSAL RANGE
FINAL HAZARDOUS WASTE OPERATING PERMIT RENEWAL

The LDEQ, Office of Environmental Services, has made the decision to issue the final hazardous waste operating permit renewal for US Army, Fort Polk, 6661 Warrior Trail, BLDG 350, Fort Polk, LA 71459-5339 for the continued operation of the Open Burn/Open Detonation unit. **The facility is located at Whiskey Chitto Road, Fort Polk, Vernon Parish.**

Under this operating permit, U.S. Army, Fort Polk will continue to be authorized to operate the OB/OD unit for the purpose of treating reactive hazardous waste.

The final permitting action and related documents are available for review and copying (all documents copied will be subject to a \$0.25 charge per copied page) at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy of this action may be reviewed at Vernon Parish Public Library, Leesville Branch, 1401 Nolan Trace, Leesville, Louisiana 71146.

In accordance with Louisiana Revised Statutes (La R.S.) 30:2024, the Permittee may file with the secretary a request for a hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial District Court within 30 days after the notice of the action has been given.

Previous notices have been published in the The Leesville Daily Leader and The Advocate on Wednesday, June 30, 2010.

Inquiries or requests for additional information regarding this permit action, should be directed to Nora Lane, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-0956.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at DEQ.PUBLICNOTICES@LA.GOV or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the issued permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.asp.

All correspondence should specify AI Number 8994, Permit Number LA0 214 022 725-OP-RN-1, and Activity Number PER20040001.

Scheduled for publication: Friday, October 1, 2010



BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

9/28/2010

Telephone: (337) 239-2444
Fax: (337) 238-0464

Honorable Betty Westerchil
Mayor of Leesville
101 West Lee
Leesville, LA 71446-4039

**RE: Final Hazardous Waste Permit
USArmy JRTC & Fort Polk
A18994, PER20040001, Permit Number LA0214022725
Fort Polk, Vernon Parish, Louisiana**

Dear Mayor Westerchil:

The Louisiana Department of Environmental Quality (LDEQ) is requesting public comments regarding permitting actions for the USArmy JRTC & Fort Polk..

For your reference, attached is a copy of the legal notice that is scheduled to be published in/or announced on:

Advocate
Leesville Daily Leader

Friday, October 01, 2010
Friday, October 01, 2010

It is also posted on the LDEQ Website, found at www.deq.state.la.us.

Should you have any questions, additional permit information may be obtained from Nora Lane, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact Heather Manry, LDEQ, Permit Support Services Division, Permit Support Section, at (225) 219-3279.

Please complete the attached 'Verification of Receipt' and mail to Heather Manry, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8206. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279.

Sincerely,

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

9/28/2010

Telephone: (337) 491-2667
Fax: (337) 491-2682

Mr. Billy Eakin
Southwest Regional Office Manager
1301 Gadwall Street
Lake Charles, LA 70615-

**RE: Final Hazardous Waste Permit
USArmy JRTC & Fort Polk
A18994, PER20040001, Permit Number LA0214022725
Fort Polk, Vernon Parish, Louisiana**

Dear Mr. Eakin:

We have enclosed a copy of the permit and public notice for the referenced facility for your use and for the public review.

Please complete the attached 'Verification by Regional Office' and Fax to Heather Manry, at (225) 325-8206. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279.

Sincerely,

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/



BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

9/28/2010

Telephone: 337-239-2027
Fax: 337-238-0666

Mr. Howard Coy
Director/Branch Manager
Vernon Parish Library - Headquarters
1401 Nolan Trace@Abe Allen Memorial Dr
Leesville, LA 71446

RE: Final Hazardous Waste Permit
USArmy JRTC & Fort Polk
AI8994, PER20040001, Permit Number LA0214022725
Fort Polk, Vernon Parish, Louisiana

Dear Mr. Coy:

We request that the enclosed documents for the permitting action for referenced company/facility be made available for public review upon receipt in the Vernon Parish Library - Headquarters. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Haz Waste Permits Division will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Heather Manry, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8206. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279.

Sincerely,

Heather Manry

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

9/28/2010

Telephone: (214) 665-6750
Fax: (214) 665-6762

Mr. Kishor Fruitwala
EPA Region VI
1445 Ross Avenue
Dallas, TX 752022733

**RE: Final Hazardous Waste Permit
USArmy JRTC & Fort Polk
A18994, PER20040001, Permit Number LA0214022725
Fort Polk, Vernon Parish, Louisiana**

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference a copy of the permitting action for the above referenced facility.

The legal notice is scheduled to be published in/or announced on:

Advocate

Friday, October 01, 2010

Leesville Daily Leader

Friday, October 01, 2010

It is also posted on the LDEQ Website, found at www.deq.state.la.us.

Should you have any questions, additional permit information may be obtained from Nora Lane, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact me at, (225) 219-3279

Please complete the attached 'Verification of Receipt' and mail to Heather Manry, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8206. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279.

Sincerely,

Heather Manry

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

9/28/2010

Telephone: (337) 238-0324
Fax: (337) 238-0240

Mr. James B. Tuck
President Vernon Parish Police Jury
300 South 3rd Street
Leesville, LA, LA 71446

**RE: Final Hazardous Waste Permit
USArmy JRTC & Fort Polk
A18994, PER20040001, Permit Number LA0214022725
Fort Polk, Vernon Parish, Louisiana**

Dear Mr. Tuck:

For your reference, attached is a copy of the Final Hazardous Waste Permit and the legal notice is scheduled to be published in/or announced on:

Advocate
Leesville Daily Leader

Friday, October 01, 2010
Friday, October 01, 2010

It is also posted on the LDEQ Website, found at www.deq.state.la.us.

Should you have any questions, additional permit information may be obtained from Nora Lane, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact Heather Manry, LDEQ, Permit Support Services Division, Permit Support Section, at (225) 219-3279

Please complete the attached 'Verification of Receipt' and mail to Heather Manry, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8206. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3279.

Sincerely,

Heather Manry
Environmental Project Specialist, Public Participation Group

HM

Attachments/

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Mr. R. Ellis Smith, Director of Public Works
US Army Installation Management Agency
Headquarters, United States Army Garrison, Fort Polk
6661 Warrior Trail, BLDG 350
Fort Polk, Louisiana 71459-5339

RE: Final Hazardous Waste Subpart X Operating Renewal Permit
Explosive Ordnance Disposal (EOD) Range
U.S. Army Fort Polk, Whiskey Chitto Road, Fort Polk, Vernon Parish, Louisiana
A1#8994 / LA0 214 022 725-OP-RN-1 / PER20040001

Dear Mr. Smith:

Enclosed is your copy of the U.S. Army hazardous operating permit (Subpart X) for the Explosive Ordnance Range, LA0 214 022 725-OP-RN-1, which incorporates language pertaining to treatment operations at the Fort Polk facility.

In accordance with Louisiana Revised Statute (La. R.S.) La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial District Court within thirty (30) days after the notice of the action has been given.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit (including authorization under general permits; variances and other authorizations) during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Please reference Agency Interest # 8994, Activity # PER20040001, EPA ID # LA0 214 022 725, and Permit Number LA0 214 022 725-OP-RN-1 on all correspondence pertaining to this matter. Any questions concerning this action should be directed to Ms. Nora Lane at (225) 219-0956.

Sincerely,

Handwritten signature of Sam Phillips in cursive.

Sam Phillips
Administrator
Waste Permits Division

Enclosure

cc: Kishor Fruitwala, USEPA

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	US Army Fort Polk	AI #: 8994/LA0 214 022 725	TEMPO Activity No: PER20040001
Facility Name:	US Army Fort Polk	Remarks Submitted by: 05/21/2010	
Permit Writer:	Nora Lane	Permit Writer Email address: nora.lane@la.gov	

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Permit Condition II.E.21.a”). **Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action. **DEQ Response** – **DO NOT COMPLETE THIS SECTION**. This section will be completed by Waste Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

- **DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.**

Permit Reference	Remarks	Waste Permits Division Response (for official use only)
Fact Sheet	Fort Polk’s initial Subpart X permit was issued in March 1995 and scheduled to expire in March 2005. A modified permit was issued in August 2001, with an effective date of 10 OCT 2001. No permit was issued in December 2004. (See Fact Sheet, Page 1, Section I. 3 rd paragraph). The permit issuance date is incorrect in the Fact Sheet.	LDEQ concurs, the Fact Sheet was amended.
Fact Sheet	Fort Polk’s Subpart X permit renewal application was submitted in November 2004. Fort Polk’s response to NODs #1 was submitted in November 2008, and response to NODs #2 was submitted in May 2009. (See Fact Sheet, Section II. 1 st paragraph)	LDEQ concurs, the Fact Sheet was amended.

Fact Sheet	Fort Polk is an Army post, not an Air Force or Navy base. (See Fact Sheet, page 4, Section III)	LDEQ concurs, the Fact Sheet was amended.
Fact Sheet	Fort Polk is not receiving waste generated off-site. (See Fact Sheet, page 4, Section III, last sentence)	The Fact Sheet was amended accordingly.
Page 15, Condition III.A.2 and III.B	The permit application says Fort Polk will not be accepting waste from off-site sources. Level 1 EOD responses do not involve waste.	LDEQ concurs. These permit Conditions were revised accordingly.
Page 15, Condition III.C.1	Which report does "the annual report" refer to in this citation? Is this the annual Hazardous Waste report due on March 1?	LDEQ concurs. The Permit language has been changed to read "in the Hazardous Waste annual report".
Page 21, Condition IV.A.Table 1	Max capacity = 200 lbs per event? Should it read 200 lbs Net Explosive Weight (NEW)? The Max annual limit is 3,200 pounds NEW.	LDEQ concurs. Table 1 was clarified to read: "Maximum Capacity = 200 lbs NEW per event.", and "Maximum Capacity = 3200 lbs NEW annually."
Page 25, Condition V.A.4.b	EOD may not use the burn pan every quarter. Can the text be changed to say the ash will be sampled after each use of the burn pan?	LDEQ concurs. The residual ash in the burn pan must be sampled after each use or quarterly, whichever is less. Permit language was modified accordingly.
Page 26, Condition V.B.1.b(7)	Metal bearing wastes are listed in LAC 33:V.2299.Table 12. Does this prohibition apply to bullets?	LDEQ notes the comment. This requirement has been removed.
Page 9, Condition II.E.15 and Page 28, Condition V.C.1.b	Fort Polk recently submitted the 2010 EOD Groundwater Monitoring Work Plan (7 May 2010). Does this condition mean Fort Polk must submit another one?	LDEQ notes the comment. The "EOD Groundwater Monitoring Work Plan" dated May 10, 2010, and the "45 th EOD Range Groundwater Monitoring Program" dated 01/01/1997, are incorporated into the permit by reference. The current/ongoing groundwater monitoring of the EOD Range-OB/OD unit does not alone fulfill the Release Detection Monitoring Program Workplan as required in Permit Condition section V.C.1.b(1) - (7). However, the permit language was revised to reflect that the on-going approved groundwater monitoring program of the permitted unit can be incorporated into the Release Detection Monitoring Workplan.
Page 29, Condition V.C.1.b(4)	Is this a new requirement for surface soil sampling at the EOD Range? Or can Fort Polk use the analytical results from previous sampling events at the EOD range?	LDEQ notes the comment. Previous monitoring results can be used in the EOD's "Release Detection Monitoring Program". The Release Detection Monitoring Program is an ongoing continuous program that evaluates the OB/OD range at all times to detect a hazardous releases that could affect human health and the environment; therefore, this condition is not revised.
Page 29, Condition V.C.1.b(5)	Does monitoring have to be quarterly? Can the frequency be changed to semi-annual or annual monitoring based on historical results?	LDEQ notes the comment. The permit makes provisions for reduced monitoring. Reduced monitoring can be requested if justified by a review and acceptance of historical results and by a Class 1' permit modification.

Page 29, Condition V.C.1.b(5)	Can the reporting of sampling events be extended to a period longer than 90 days after sample collection? Presently Fort Polk samples groundwater twice per year and produces one report for the two events. The report is submitted annually. Based on historical sampling results, can the annual sampling requirement be inserted into the permit now, instead of doing a permit modification later?	LDEQ notes the comment. It is acceptable to submit the Release Detection Monitoring Report annually. The permit language was revised.
Page 30, Condition V.C.1.c		LDEQ notes the comment. It is necessary to review the historical monitoring in the context of the Release Detection Monitoring Program prior to approving annual sampling. The permit was not amended a this time, however, a Class 1 permit modification can be submitted for approval after the review is complete.
Page 44, Condition VIII.A.5 and Page 59, Condition VIII.J.7	Fort Polk is exempt from this condition in accordance with LAC 33:3703.C. The requirement should be removed.	LDEQ concurs, this requirement was noted as "Reserved" in the noted permit Conditions.
Page 67, Table 1	Fort Polk will present an alternate schedule for the CAS submittals identified in Table 1 for discussion at the Scoping Meeting. Funding constraints and other programmatic variables will have a direct impact on Fort Polk's timeline for addressing these Corrective Actions.	LDEQ notes the comment. No permit revision necessary.
Appendix 1, Table 1	The text in the Status of Corrective Action column for SWMU 23 is incorrect. The text should read "Corrective Measures Implementation Plan (CERCLA) was approved in October 2008. Source removal was completed in August 2009. The site is presently under Long Term Management."	LDEQ concurs. The permit language was revised accordingly.
Appendix 1, Table 1	LDEQ granted NFA status for SWMU 25 on 29 APR 2010 (47183618). SWMU 25 should be removed from Table 1 and added to Table 2.	LDEQ concurs. SWMU 25 was removed from Appendix 1, Table 1, and recorded in Appendix 1, Table 2.
Appendix 1, Table 1	The text in the Status of Corrective Action column for SWMU 26 is incorrect. The text should read "To be NFA" and the entry should be moved from Table 1 to Table 2.	LDEQ concurs. SWMU 26 was removed from Appendix 1, Table 1, and recorded in Appendix 1, Table 2.
Appendix 1, Table 2	The text in the AOC/SWMU Description column for SWMU 37 is incorrect. The text should read "4300 Block Vehicle Maintenance Units".	LDEQ concurs. The permit language was revised accordingly.
Appendix 1, Table 2	The text in the Status of Corrective Action column for SWMU 47 is incorrect. The text should read "NFA'D: 45954935 02/23/2010".	LDEQ concurs. Appendix 1, Table 2 was revised accordingly.

SIGNATURE PAGE

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HAZARDOUS WASTE OPERATING PERMIT

PERMITTEE: UNITED STATES ARMY, FORT POLK

PERMIT NUMBER: LA0 214022725-OP-RN-1
Agency Interest # 8994 Activity #PER20040001

FACILITY LOCATION: WHISKEY CHITTO ROAD
FORT POLK, LOUISIANA, 71459

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law La. R.S. 30:2171 et seq., and the regulations adopted there under and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to the United States Army, Fort Polk (hereafter called the Permittee), to operate a hazardous waste treatment and storage facility located in Fort Polk, Vernon Parish, Louisiana, at latitude 31° 01' 47" N and longitude 93° 04' 50" W.

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality or his/her designee.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations contained in the Louisiana Administrative Code, Title 33, Part V, Subpart I (LAC 33:V.Subpart 1.) Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of October 31, 2010, and shall remain in effect until October 31, 2020, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the Secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302



Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality



Date

PART A
APPLICATION

TSD

LD

<p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p>	<p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input checked="" type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input checked="" type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)</p>		
<p>2. Site EPA ID Number</p>	<p>EPA ID Number LA0214022725</p> <p style="text-align: right; font-size: 1.2em;">8994</p>		
<p>3. Site Name</p>	<p>Name: U.S. ARMY, FORT POLK</p>		
<p>4. Site Location Information</p>	<p>Street Address: 1647 23rd STREET, BUILDING 2516</p> <p>City, Town, or Village: FORT POLK County: VERNON</p> <p>State: LA Country: U.S. Zip Code: 71459</p>		
<p>5. Site Land Type</p> <p>NAICS Code(s) for the Site (at least 5-digit codes)</p>	<p><input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>A. 92811 C. </p> <p>B. D. </p>		
<p>7. Site Mailing Address</p>	<p>Street or P.O. Box: 1647 23rd STREET, BUILDING #2516</p> <p>City, Town, or Village: FORT POLK</p> <p>State: LA Country: U.S. Zip Code: 71459</p>		
<p>8. Site Contact Person</p>	<p>First Name: ALAN MI: W. Last: MOLTSAU</p> <p>Title: HAZARDOUS WASTE MANAGER</p> <p>Street or P.O. Box: 1647 23rd STREET, BUILDING #2516</p> <p>City, Town or Village: FORT POLK</p> <p>State: LA Country: U.S. Zip Code: 71459</p> <p>Email: alan.moltsau@us.army.mil</p> <p>Phone: (337) 531-4375 Ext.: Fax: (337) 531-8950</p>		
<p>9. Legal Owner and Operator of the Site</p>	<p>A. Name of Site's Legal Owner: FRANCIS B. BURNS Date Became Owner: 07/08/2009</p> <p>Owner Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: 6661 WARRIOR TRAIL, BUILDING #350</p> <p>City, Town, or Village: FORT POLK Phone: (337) 531-1606</p> <p>State: LA Country: U.S. Zip Code: 71459</p> <p>B. Name of Site's Operator: U.S. ARMY Date Became Operator: 03/03/1949</p> <p>Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input checked="" type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

RCRA Info 4/7/8
TEMPO 3/30/10

FEB 26 2010

LDPO

10. Type of Regulated Waste Activity (at your site)
 Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

- | | |
|--|---|
| <p>Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 1. Generator of Hazardous Waste
 If "Yes", mark only one of the following - a, b, or c.</p> <p><input checked="" type="checkbox"/> a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.</p> <p><input type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo) of non-acute hazardous waste.</p> <p><input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.</p> <p>If "Yes" above, indicate other generator activities.</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.</p> <p><input type="checkbox"/> N <input checked="" type="checkbox"/> e. United States Importer of Hazardous Waste</p> <p><input type="checkbox"/> N <input checked="" type="checkbox"/> f. Mixed Waste (hazardous and radioactive) Generator</p> | <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 2. Transporter of Hazardous Waste
 If "Yes", mark all that apply.</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility (at your site)</p> <p>Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste Note: A hazardous waste permit is required for these activities.</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 4. Recycler of Hazardous Waste</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
 If "Yes", mark all that apply.</p> <p><input type="checkbox"/> a. Small Quantity On-site Burner Exemption</p> <p><input type="checkbox"/> b. Smelting, Melting, and Refining Furnace Exemption</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 6. Underground Injection Control</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 7. Receives Hazardous Waste from Off-site</p> |
|--|---|

B. Universal Waste Activities; Complete all parts 1-2.

- Y N **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**
- | | |
|--------------------------------------|-------------------------------------|
| a. Batteries | <input checked="" type="checkbox"/> |
| b. Pesticides | <input type="checkbox"/> |
| c. Mercury containing equipment | <input checked="" type="checkbox"/> |
| d. Lamps | <input checked="" type="checkbox"/> |
| e. Other (specify) <u>Antifreeze</u> | <input checked="" type="checkbox"/> |
| f. Other (specify) _____ | <input type="checkbox"/> |
| g. Other (specify) _____ | <input type="checkbox"/> |
- Y N **2. Destination Facility for Universal Waste**
 Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

- Y N **1. Used Oil Transporter**
 If "Yes", mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y N **2. Used Oil Processor and/or Re-refiner**
 If "Yes", mark all that apply.
- a. Processor
- b. Re-refiner
- Y N **3. Off-Specification Used Oil Burner**
- Y N **4. Used Oil Fuel Marketer**
 If "Yes", mark all that apply.
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- b. Marketer Who First Claims the Used Oil Meets the Specifications

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D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- a. College or University
- b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D011	D018	D020	D022	D026
D027	D029	D031	D033	D035	D039	D040
F003	F005	U002	U072	U080	U154	U161
U220	U226	U228	U239			

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

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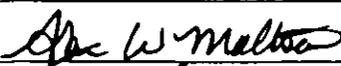
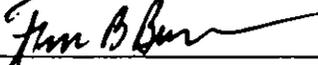
12. Notification of Hazardous Secondary Material (HSM) Activity

Y N Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	ALAN W. MOLTSAU, H/W MANAGER	02/01/2010
	FRANCIS B. BURNS, GARRISON CDR	02/24/2010

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United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 23)	First Name: Same as site contact	MI:	Last Name:
	Phone Number:		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: Same as site contact		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	
3. Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: 6661 Warrior Trail, Building 350, Suite 500		
	City, Town, or Village: Fort Polk		
	State: LA		
	Country: United States	Zip Code: 71459	Phone Number: (337) 531-1606
4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: 1647 23rd St. Bldg 2516		
	City, Town, or Village: Fort Polk		
	State: LA		
	Country: United States	Zip Code: 71459	Phone Number: (337) 531-6008
5. Facility Existence Date (See instructions on page 24)	Facility Existence Date (mm/dd/yyyy): 03/03/1949		
6. Other Environmental Permits (See instructions on page 24)			
A. Permit Type (Enter code)	B. Permit Number	C. Description	
		See attached list of permits	
7. Nature of Business (Provide a brief description; see instructions on page 24)			

1. Process Codes and Design Capacities (See instructions on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).

B. PROCESS DESIGN CAPACITY - For each code entered in Section A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. UNIT OF MEASURE - For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	<u>Disposal:</u>			<u>Treatment (continued):</u>	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	For T81-T93:
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure in Code Table Below	T86	Blast Furnace	
	<u>Storage:</u>		T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
S99	Other Storage	Any Unit of Measure in Code Table Below	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	<u>Treatment:</u>			<u>Miscellaneous (Subpart X):</u>	
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G
Gallons Per Hour.....	E
Gallons Per Day.....	U
Liters.....	L
Liters Per Hour.....	H
Liters Per Day.....	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour.....	D
Metric Tons Per Hour.....	W
Short Tons Per Day.....	N
Metric Tons Per Day.....	S
Pounds Per Hour.....	J
Kilograms Per Hour.....	R
Million Btu Per Hour.....	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards.....	Y
Cubic Meters.....	C
Acres.....	B
Acre-feet.....	A
Hectares.....	Q
Hectare-meter.....	F
Btu Per Hour.....	I

Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only
				(1) Amount (Specify)	(2) Unit of Measure (Enter code)		
X 1	S	0	2	5 3 3 . 7 8 8	G	0 0 1	
1	x	0	1	2 0 0 . 0 0 0	P*	0 0 0	
2							
3				*200 lbs net explosive weight per			
4				detonation or burning event.			
5							
6							
7							
8							
9							
1 0							
1 1							
1 2							
1 3							
1 4							
1 5							

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in sequence with Item 8)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
				(1) Amount (Specify)	(2) Unit of Measure (Enter code)		
X 2	T	0	4	1 0 0 . 0 0 0	U	0 0 1	In-situ Vitrification
2							
3							
4							

10. Description of Hazardous Wastes (See instructions on page 25) - Enter information in the Sections on Form Page 5.

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in Section B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 10.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES						
				(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION- (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T	0	3	D	8	0	
X 2	D 0 0 2	400	P	T	0	3	D	8	0	
X 3	D 0 0 1	100	P	T	0	3	D	8	0	
X 4	D 0 0 2									Included With Above

Description of Hazardous Wastes (Continued. Use the Additional Sheet(s) as necessary; number pages as 5 a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)			B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES			(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
						(1) PROCESS CODES (Enter code)			
1	D	0	0 3	3,200	P*	X	0	1	
2									
3									
4					*3,200 lbs net explosive weight treated per year				
5									
6									
7									
8									
9									
1 0									
1 1									
1 2									
1 3									
1 4									
1 5									
1 6									
1 7									
1 8									
1 9									
2 0									
2 1									
2 2									
2 3									
2 4									
2 5									
2 6									
2 7									
2 8									
2 9									
3 0									
3 1									
3 2									
3 3									
3 4									
3 5									
3 6									
3 7									
3 8									
3 9									

Map (See instructions on pages 25 and 26)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instructions on page 26)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 26)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See instructions on page 26)

Empty text area for comments.

**TABLE OF
CONTENTS**

TABLE OF CONTENTS

US ARMY, FORT POLK (LA0 214 022 725-OP-RN-1)

I. PERMIT PREAMBLE..... 1

II. GENERAL PERMIT CONDITIONS..... 4

 II.A. DURATION OF PERMIT..... 4

 II.B. EFFECT OF PERMIT..... 4

 II.C. PERMIT ACTIONS..... 4

 II.D. SEVERABILITY..... 5

 II.E. DUTIES AND REQUIREMENTS..... 5

III. GENERAL OPERATING CONDITIONS..... 15

 III.A. DESIGN AND OPERATION OF ALL FACILITIES..... 15

 III.B. REQUIRED NOTICE..... 15

 III.C. GENERAL WASTE ANALYSIS..... 15

 III.D. SECURITY..... 16

 III.E. GENERAL INSPECTION REQUIREMENTS..... 16

 III.F. PERSONNEL TRAINING..... 16

 III.G. REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE..... 16

 III.H. LOCATION STANDARDS..... 16

 III.I. PRECIPITATION RUN-ON AND RUN-OFF..... 16

 III.J. HURRICANE EVENTS..... 17

 III.K. PREPAREDNESS AND PREVENTION..... 17

 III.L. CONTINGENCY PLAN..... 17

 III.M. MANIFEST SYSTEM..... 18

 III.N. RECORD KEEPING AND REPORTING..... 18

 III.O. CLOSURE..... 18

 III.P. POST- CLOSURE..... 19

 III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE..... 20

 III.R. FINANCIAL ASSURANCE..... 20

 III.S. LIABILITY REQUIREMENTS..... 20

 III.T. INCAPACITY OF PERMITTEE..... 20

 III.U. POST-CLOSURE NOTICES..... 20

IV. PERMITTED FACILITIES..... 21

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

 V.A. MISCELLANEOUS UNIT: OPEN BURN/OPEN DETONATION (OB/OD UNIT)..... 22

 V.B. GENERAL REQUIREMENTS FOR THE OB/OD UNIT..... 26

 V.C. SPECIFIC REQUIREMENTS FOR THE OB/OD UNIT..... 28

VI. GROUNDWATER PROTECTION..... 33

 VI.A. APPLICABILITY..... 33

 VI.B. REQUIRED PROGRAMS..... 33

 VI.C. GROUNDWATER PROTECTION STANDARD..... 33

TABLE OF CONTENTS, CONTINUED
FORT POLK

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS	34
VII.A. STANDARD CONDITIONS	34
VII.B. EMISSION STANDARDS, PROCESS VENTS, EQUIPMENT LEAKS	38
VII.C. SPECIFIC CONDITION - CLOSURE	38
VIII. SPECIAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS	39
VIII.A. ALTERNATE CORRECTIVE ACTION	40
VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING	44
VIII.C. REPORTING REQUIREMENTS	46
VIII.D. SPECIFIC CONDITION- CONCEPTUAL SITE MODEL	46
VIII.E. INTERIM MEASURES	52
VIII.F. CORRECTIVE ACTION STRATEGY (CAS)	53
VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS	55
VIII.H. RECAP REPORT	56
VIII.I. REMEDIAL ALTERNATIVES STUDY	56
VIII.J. RISK MANAGEMENT PLAN	58
VIII.K. DETERMINATION OF NO FURTHER ACTION	60
VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY IDENTIFIED SWMUS AND POTENTIAL AOC'S	62
VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES AT A SWMU OR AOC	63
VIII.N. PUBLIC PARTICIPATION REQUIREMENTS	63
VIII.O. DISPUTE RESOLUTION	65
APPENDIX 1: SUMMARY OF CORRECTIVE ACTION ACTIVITIES	68

Attachment 1: List of Facility Documents Incorporated in the Permit by Reference

Fort Polk List of Environmental Permits

Effective Date	Expiration Date	Permit Duration	Permit	Permit #	Agency	Program Area	Program Manager
17-Mar-03	16-Mar-08	5 Years	Part 70 (Title V) Operating Permit	2690-00010-V3	USEPA, LDEQ	Air Quality	Harvey Skinner
2-Jun-95	1-Jun-05	10 Years	Subpart X OB/OD RCRA Permit for EOD Range	LA0214022725	LDEQ	Hazardous Waste	Jeff Ross
1-May-06	30-Apr-11	5 Years	LPDES Stormwater Multi-Sector General Permit (MSGP)	LAR05N120	LDEQ	Stormwater	Tom Duck
1-Dec-03	30-Nov-08	5 Years	LPDES South Fort Wastewater Treatment Plant	LA0032221	LDEQ	Wastewater	Tom Duck
1-Oct-03	30-Sep-08	5 Years	LPDES North Fort Wastewater Treatment Plant	LA0032239	LDEQ	Wastewater	Tom Duck
1-Mar-03	29-Feb-08	5 Years	LPDES Toledo Bend Wastewater Treatment Plant	LAG540754	LDEQ	Wastewater	Tom Duck
1-Dec-02	30-Nov-07	5 Years	LPDES Peason Ridge Wastewater Treatment Plant	LAG530578	LDEQ	Wastewater	Tom Duck
13-Jan-86	LDEQ 10-Oct-06	Final closure certification submitted to	Standard Solid Waste Permit for Landfarm	P-0070	LDEQ	Solid Waste	Steve Gibson
11-Oct-85	Landfill closure approval 11-Mar-99		Standard Solid Waste Permit for Sanitary Landfill	P-0056	LDEQ	Solid Waste	Steve Gibson
1-Oct-04	30-Sep-09	5 years	LPDES General Stormwater Discharge Permit for Construction Activities greater than 5 acres	LAR100000*	LDEQ	Stormwater	Tom Duck
1-Mar-03	29-Feb-08	5 years	LPDES General Stormwater Discharge Permit for Construction Activities greater than 1 acre but less than 5 acres	LAR200000*	LDEQ	Stormwater	Tom Duck

**BODY
OF
PERMIT**

**HAZARDOUS WASTE OPERATING RENEWAL PERMIT
EXPLOSIVE ORDNANCE DISPOSAL (EOD) RANGE**

**U.S. Army Fort Polk
EPA ID# LA0 214 022 725
Agency Interest# 8994**

**Vernon Parish
Fort Polk, Louisiana
PER20040001
Permit Number LA0 214 022 725 -OP-RN-1**

I. PERMIT PREAMBLE

This permit is issued to Fort Polk, hereinafter referred to as the permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted there under.

For the purposes of the permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the permittee's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et. seq., and the regulations adopted there under.

All definitions contained in this permit shall have the meaning as defined in the Louisiana Administrative Code (LAC), Title 33, Part V, Subpart 1 unless otherwise stated herein.

All regulating citations are defined as being the regulation in effect on the date of the issuance of this permit. New and/or amended regulations are not included as permit requirements until permit modification procedures as specified in Condition II.C of this permit are completed.

GLOSSARY OF TERMS

For the purpose of this permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart I, unless the context of use in this permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

“Administrative Authority” means the Secretary of the Department of Environmental Quality or his designee or the appropriate assistant secretary or his designee.

“Application” refers to the RCRA Part B permit application and subsequent amendments submitted by the permittee for obtaining a permit.

“CWA” means Clean Water Act, 33 USC 1251 et seq.

“Corrective Action” is an activity conducted to protect human health and the environment.

“Department” means the Louisiana Department of Environmental Quality.

“EPA” means the United States Environmental Protection Agency.

“ESP” means electrostatic precipitator.

“HSWA” means the 1984 Hazardous and Solid Waste Amendments to RCRA.

“Hazardous Waste Constituent” means a constituent that caused the Administrator to list the hazardous waste in part 40 CFR 261, subpart D or a constituent listed in table 1 of 40 CFR 261.24.

“LDEQ” means the Louisiana Department of Environmental Quality.

“Newly-discovered Release” any release(s) of hazardous waste, including hazardous waste constituents, in which there is a statistically significant increase over the background data for the media of concern, during the course of groundwater monitoring, field investigation, environmental auditing, or by other means.

“Operating Record” means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this permit, document noncompliance with this permit, or document actions taken to remedy noncompliance with this permit. The minimum list of documents that must be included in the operating record is identified at LAC 33:V.1529.B.

“Permittee” means U.S. Army Fort Polk, Pickering/Fort Polk, Vernon Parish, Louisiana.

“RCRA Permit” means the full permit, with RCRA and HSWA portions.

“RFA” means RCRA Facility Assessment.

“RFI” means RCRA Facility Investigation.

“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).

“SARA” means Superfund Amendments and Reauthorization Action of 1986.

“Solid Waste Management Unit” (SWMU) means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

“Stabilization” is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to the permit.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the permittee to store and treat hazardous waste, in accordance with the conditions of this permit. The permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit during its term constitutes compliance for purposes of enforcement, with LAC 33:V.Subpart 1, except for those requirements not included in the permit under LAC 33:V.307.A.1-4, and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Condition 3013 or Condition 7003 of RCRA, or under Condition 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may reopen and modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit, as described in LAC 33:V.701. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the LAC 33:V.Subpart 1 and the Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit and in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

The permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from LAC 33:V.4999, Appendix D. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan referenced in Attachment I.

II.E.9.b. Records of monitoring information shall include:

II.E.9.b.(1). the date, sampling location, and time of sampling or measurements, in accordance with LAC 33:V.309.J.3;

II.E.9.b.(2). the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;

II.E.9.b.(3). the date(s) analyses were performed;

II.E.9.b.(4). the name(s) and signature(s) of the individual(s) who performed the analyses (initials may be used to indicate individuals who perform sampling and maintenance, however, the record must clearly indicate the signature(s) associated with each initial);

II.E.9.b.(5). the analytical techniques or methods used;

II.E.9.b.(6). the results of such analyses; and

II.E.9.b.(7). associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.(1). any commercial laboratory providing analytical results and test data to the Department required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I.Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: <http://cms/portal/tabid/2925/Default.aspx>.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;
- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or
- otherwise required by Department regulations.

This includes, but is not limited to, data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

II.E.9.c.(2). If the permittee decides to use its own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document all quality assurance/quality control procedures used to generate data for the LDEQ.

II.E.9.c.(3). For approval of equivalent testing or analytical methods, the permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The permittee shall maintain records through the active life of the facility as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C. File copies shall be kept for LDEQ Inspection for a period of not less than three years as required by LAC 33:V.317.B.

The permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For any new or existing unit being modified, the permittee may not manage hazardous waste in the modified portion of the unit until the unit is complete and:

II.E.12.a. the permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the permittee and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.D and E, as applicable.

II.E.15. Schedule of Compliance

II.E.15.a. Within 180 days of the effective date of this permit, the permittee shall submit a Release Detection Monitoring Work Plan to implement an expanded monitoring program that includes the ongoing groundwater monitoring program (specified in permit Condition VI. C) and the additional requirements specified in Specific Operating Condition V.C.1.b.(1) – (7).

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:l.3915, in the event of an unauthorized discharge of hazardous waste or hazardous waste constituents that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse

impact to the land, water, or air environment, or cause severe damage to property), the permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 or 1-877 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge of hazardous waste or hazardous waste constituents that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the groundwaters of the state but does not result in an emergency condition, the permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge of hazardous waste or hazardous waste constituents resulting in contamination of groundwaters of the state by moving in, into, within or on any saturated subsurface strata, the permittee shall notify the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC within seven (7) days after learning of the discharge.

II.E.19. Written Notification Reports for Unauthorized Discharges

The permittee shall submit written reports to the SPOC for any unauthorized discharges of hazardous waste or hazardous waste constituents requiring notification under Conditions II.E.16, II.E.17 and II.E.18 of this permit, to the SPOC within seven (7) calendar days after notification required by Conditions II.16 through II.18, in accordance with LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Condition II.E.16, II.E.17, and II.E.18 that may endanger the human health or the environment in accordance with LAC 33:V.309.L.7. This report shall include at minimum the following information:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the

environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b.(1). name, address, and telephone number of the owner or operator;

II.E.20.b.(2). name, address, and telephone number of the facility;

II.E.20.b.(3). date, time, and type of incident;

II.E.20.b.(4). name and quantity of materials involved;

II.E.20.b.(5). the extent of injuries, if any;

II.E.20.b.(6). an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.20.b.(7). estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The permittee shall provide a written submission within five (5) days after the time the permittee becomes aware of any noncompliance which may endanger human health or the environment and reported under Condition II.E.20. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the permittee must submit a written report within fifteen (15) days after the time the permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.d.

II.E.22. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Conditions II.E.16, II.E.17, II.E.18, and II.E.19, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.20.

II.E.23. Other Information

Whenever the permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the permittee shall promptly submit such facts or information.

II.E.24. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Additional Operating Standards

Federal and State Explosives Regulations. Treatment and disposal of hazardous waste military munitions are subject to the applicable permitting, procedural, and technical standards in LAC 33:V.Subpart 1, LAC 33:V.Chapter 43, particularly LAC 33:V.4533, Subchapter O, and where applicable, Subchapter U, 40 CFR 264, Subpart X, the Military Munitions Rule and Department of Defense Guidelines.

II.E.26. Updated Documents To Be Submitted Prior To Operation

(RESERVED)

II.E.27. Documents To Be Maintained at Facility Site

II.E.27.a. The permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.27.a.(1). Waste Analysis Plan submitted in accordance with LAC 33:V.1519 and approved by the Administrative Authority (see Attachment 1).

II.E.27.a.(2). Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.27.a.(3). Contingency Plan submitted in accordance with LAC 33:V.1513 and approved by the Administrative Authority (see Attachment 1).

II.E.27.a.(4). Arrangements with local authorities in accordance with LAC 33:V.1511.G.

II.E.27.a.(5). Closure Plans submitted in accordance with LAC 33:V.3511 and approved by the Administrative Authority, as well as any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.27.a.(6). Operating records referenced as required by LAC 33:V.1529, and 3007.K.

II.E.27.a.(7). Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B and approved by the Administrative Authority (see Attachment 1).

II.E.27.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.28. Annual Report

The permittee shall submit an annual report covering all hazardous waste units and activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.29. Manifest

The permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9 and LAC 33:V.1111.

II.E.30. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.31. Water Discharges

Water discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.32. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the permittee determines that an un-permitted hazardous waste facility exists, the permittee must immediately notify the Administrative Authority in accordance with Condition II.E.22 of the General Permit Conditions.

II.E.33. Compliance With Land Disposal Restrictions

The permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated there under.

II.E.34. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.35. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements of this permit. The facility is obligated to complete facility-wide corrective action for any newly discovered releases regardless of the operational status of the facility.

II.E.36. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the permittee to enforcement action, which may include fines, suspension, or revocation of the permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

II.E.37. Compliance Reports

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.B. REQUIRED NOTICE (RESERVED)

III.C. GENERAL WASTE ANALYSIS

The permittee shall follow the procedures described in the Waste Analysis Plan referenced in Attachment I and in accordance with LAC 33:V.1519.

III.C.1. The permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the Hazardous Waste annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.

III.C.2. Annually, the permittee shall submit a certified statement that indicates that any laboratory (i.e., on-site laboratory or contract laboratory) that provides chemical analyses, analytical results, or other test data to the department, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:1.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services. Laboratories owned and operated by the permittee are not required to meet the requirements of this permit condition.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the permittee shall review and re-characterize all potentially impacted hazardous waste streams generated by the permittee on-site and treated, stored, and/or disposed on-site. The permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the permittee's Annual Report.

III.C.4. In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all sampling and QA/QC protocols contained in Condition II.E.9.c. All test procedures used by the permittee shall be maintained on file by the permittee and made available to the LDEQ upon request.

III.D. SECURITY

The permittee must comply with the security provisions of LAC 33:V.1507.

III.E. GENERAL INSPECTION REQUIREMENTS

The permittee must follow the approved Inspection Plan referenced in Attachment 1. The permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509, and 3007.J.

III.F. PERSONNEL TRAINING

The permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The permittee shall follow the approved Personnel Training Plan referenced in Attachment 1. The permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes. The permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 2113 and 2115.

III.H. LOCATION STANDARDS

III.H.1. The permittee has furnished that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by the Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The permittee must provide for the control by diversion and/or containment of run-on and run-off resulting from a rainfall occurring during a period of twenty-four (24) hours as defined by local rainfall records and LAC 33:V.1503.B.2.

III.J. HURRICANE EVENTS

The permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F.

III.K.5. Arrangements with Local Authorities

The permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The permittee must immediately carry out the provisions of the approved Contingency Plan referenced in Attachment 1, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The permittee shall comply with the manifest requirements of LAC 33:V.Chapter 11.

III.N. RECORD KEEPING AND REPORTING

III.N.1. Operating Record

The permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C and the approved Operations Plan referenced in Attachment I.

III.N.2. Annual Report

The permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3 Documentation of Shipments from Off-site Sources

The permittee shall utilize Incident Form 3265 to document and track shipments of reactive wastes from off-site sources to the installation.

III.O. CLOSURE/POST-CLOSURE

The permittee shall address the following regulatory citations in the closure plan: LAC 33:V. 3005.I, 3503, 3505, 3507, 3509, 3511, 3513, and 3515. The Administrative Authority may re-evaluate the adequacy of the approved closure plan and/or the confirmatory sampling procedures prior to the commencement of closure (e.g., permit renewal applications, permit modifications, notifications of intent to close).

III.O.1. Closure Performance Standard

The permittee shall close the facility in accordance with the approved Closure Plan referenced in Attachment I and in accordance with the applicable sections of LAC 33:V.3507.

III.O.2. Amendment to Closure Plan

The permittee shall amend the Closure Plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322 and 323, where applicable

III.O.3. Notification of Closure

The permittee shall notify the Administrative Authority at least forty-five (45) days prior to the date it expects to begin closure in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed For Closure

After receiving the final volume of hazardous waste, the permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3513.

III.O.5. Disposal or Decontamination of Equipment

The permittee shall decontaminate and dispose all facility equipment in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with LAC 33:V.3515.

III.O.6. Certification of Closure

The permittee shall certify that the facility has been closed in accordance with the specifications in the approved Closure Plan as required by LAC 33:V.3517.

III.O.7. Inventory at Closure

The permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed below in Table 1.

III.P. POST-CLOSURE

The permittee must attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

(RESERVED as per LAC 33:V.3701.C)

III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS

(RESERVED as per LAC 33:V.3701.C)

III.S. LIABILITY REQUIREMENTS

(RESERVED as per LAC 33:V.3701.C)

III.T. INCAPACITY OF THE PERMITTEE

(RESERVED as per LAC 33:V.3701.C)

III.U. POST-CLOSURE NOTICES

(RESERVED)

IV. PERMITTED FACILITIES

IV.A. OPEN BURNING/OPEN DETONATION (OB/OD)

The OB/OD unit is permitted for operation as a thermal treatment unit pursuant to 40 CFR 264 Hazardous Waste, Miscellaneous Units- Subpart X and LAC 33:V.Chapter 32 and all applicable regulations.

**TABLE 1
Existing OB/OD Unit**

Unit	<u>Maximum Capacity per Event (Net Explosive Weight- NEW)</u>	<u>Maximum Capacity Annually (NEW)</u>
OB/OD	200 pounds NEW per event	3200 pounds NEW annually

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

V.A. OPEN BURNING/OPEN DETONATION UNITS

This section contains the requirements for the operations of the Explosives Ordnance Disposal (EOD) open burn/open detonation unit pursuant to Subpart X of 40 CFR 264 and LAC 33:V.Chapter 32, Miscellaneous Units. The EOD unit consists of one engineered burn pan and a concrete pad.

V.A.1 OPERATION AND MAINTENANCE REQUIREMENTS

V.A.1.a. The permittee shall maintain the EOD unit to minimize the possibility of fire, explosion, or any unplanned, sudden, or non-sudden release of hazardous waste constituents to air, soil, or surface water that might threaten human health or the environment. (LAC 33:V.1511.B)

V.A.1.b. The permittee shall operate and maintain the EOD unit in accordance with the standard operating procedures referenced in the approved permit application. (LAC 33:V.3203)

V.A.1.c. The permittee shall at all times properly operate and maintain the EOD unit and associated structures in accordance with all applicable regulations and the permit conditions. Proper operation and maintenance includes, but is not limited to, effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. (LAC 33:V.309.E.1, 3203, and 3205)

V.A.1.d. The facility shall keep a record of all maintenance and repair activities conducted on the EOD unit and associated equipment. The maintenance and repair record shall be completed within one (1) working day of the date the unit was placed back into service. This record shall be part of the operating record for this permit and available at the facility at all times for review and inspection by the Administrative Authority. At a minimum, the record shall include the following information:

V.A.1.d.(1). The date the problem was discovered (if not preventative maintenance),

V.A.1.d.(2). The equipment or instrument repaired or maintained including part number or other appropriate descriptive identifiers,

V.A.1.d.(3). The type of maintenance or repair,

V.A.1.d.(4). The date maintenance or repair was completed,

V.A.1.d.(5). The name of person(s) conducting the maintenance or repair,

V.A.1.d.(6). Any data associated with calibration and testing, and

V.A.1.d.(7). The date the EOD unit was placed back into service.

V.A.2. OPERATING CONDITIONS

The permittee shall operate the EOD unit as specified below (LAC 33:V.3203 and 3205):

- V.A.2.a. The permittee shall not dispose of or treat any liquid hazardous wastes directly on or in the ground.
- V.A.2.b. All activities related to open burning or open detonation shall be performed only in the designated EOD range area.
- V.A.2.c. The permittee shall operate and maintain the precipitation cover/retractable roof in a manner that will minimize, to the greatest practical extent, the accumulation of precipitation within the burn pan and respective concrete pad. The precipitation cover/retractable roof shall be placed over the burn pan when not in use.
- V.A.2.d. Open burning or open detonation shall not be conducted if any of the following conditions exist:
 - V.A.2.d.(1). Electrical storms, thunderstorms, or periods of precipitation
 - V.A.2.d.(2). Wind speed, measured at the site, equal or exceeds ten (10) miles per hour
 - V.A.2.d.(3). Periods of reduced visibility, here defined as visibility of less than two (2) miles
 - V.A.2.d.(4). Forecast of flooding conditions
- V.A.2.e. Waste may be placed in the EOD unit only when a thermal treatment event is planned within the next four (4) hours or by the end of the operating day, whichever is less.
- V.A.2.f. Characteristic hazardous wastes must no longer exhibit reactive and explosive properties prior to removal from the burn unit for disposal. All hazardous wastes that are ejected during the thermal treatment or are not treated by the initial treatment shall be retreated.
- V.A.2.g. Ash/residues from the EOD unit shall be managed in accordance with the approved Waste Analysis Plan.

- V.A.2.h. Treatment events shall occur only between the hours of 7:30 a.m. and 4:30 p.m., Monday through Friday. This shall include, but not be limited to, physical preparations, transportation of wastes to the EOD unit, thermal treatment, and inspection after the cool-down period.
- V.A.2.i. The permittee shall record the date and time of all explosive detonations before, and after the thermal treatment process. The EOD unit where the explosion occurred and a detailed description of the wastes and the amount that exploded and the reason for the explosion shall be included in the operating record.
- V.A.2.j. A warning signal shall be operated prior to and during treatment operations.
- V.A.2.k. The reactive wastes in the burn unit shall only be remotely ignited.
- V.A.2.l. The EOD range unit area shall be maintained to adequately prevent residue and debris from contaminating the surrounding area and surface water in accordance with LAC 33:V.3203.

V.A.3. INSPECTION REQUIREMENTS

The permittee shall inspect the EOD unit in accordance with the Inspection Plan referenced in Attachment 1 of this permit. The permittee shall complete the following as part of these inspections:

- V.A.3.a. The permittee shall thoroughly inspect the EOD unit (which includes the burn pan and the concrete pad) and associated equipment/structures for leaks and/or spills in accordance with the Inspection Plan referenced in Attachment 1. The leaks/spills shall be cleaned up immediately upon discovery.
- V.A.3.b. The permittee shall inspect the EOD unit's concrete slab each operating day and shall repair any cracks or deteriorations immediately upon discovery. The burn pan and concrete pad shall be inspected before each burn.
- V.A.3.c. All defects, deteriorations, or malfunctions of the EOD unit (which includes the burn pan and concrete pad) and associated structures discovered during the required inspections shall be repaired before additional treatment can occur in the unit. If the unit is damaged and must be replaced, it shall be decontaminated prior to disposal.
- V.A.3.d. The inspection schedules and maintenance and repair records shall become part of the operating record and shall be made available at all reasonable times to the Administrative Authority in accordance with Condition III.N.
- V.A.3.e. Visual inspections are to be conducted after each burn to ensure that no releases or spills of untreated wastes are outside of the containment area or treatment process area has occurred and that no untreated waste remains.

V.A.4. RECORDKEEPING AND REPORTING REQUIREMENTS

- V.A.4.a.** The permittee shall inspect the burn area each operating day and shall record the results of this inspection record as required by Condition III.E of this permit.
- V.A.4.b.** The permittee shall sample and analyze, the ash, using the Toxicity Characteristic Leaching Procedure (TCLP) after each use of the OB/OD unit, or quarterly, whichever is less, and shall maintain the results of sampling and analysis, as required by permit Condition III.C in the operating record in accordance with Condition II.E.27.a. (7) and in accordance with LAC 33:V.1529.
- V.A.4.c.** The permittee shall report any releases from the burn area within twenty-four (24) hours, if the release may threaten human health or the environment (soil, air, groundwater, or surface water).

V.A.5. WASTE FEED LIMITATIONS

The permittee shall feed only quantities of waste to the EOD unit that does not exceed the waste feed limitations given below (LAC 33:V.3203 and 3205):

- V.A.5.a.** The permittee shall not thermally treat more than 3,200 pounds net explosive weight of hazardous waste annually.
- V.A.5.b.** The permittee shall not exceed a batch size of 200 pounds net explosive weight per detonation or burning event.

V.B. GENERAL REQUIREMENTS FOR THE OPEN BURN/OPEN DETONATION UNIT

The OB/OD is subject to the following general requirements.

V.B.1. Permitted and Prohibited Wastes

- V.B.1.a.** The permittee may only burn hazardous wastes with EPA waste codes listed in the current RCRA Subtitle C Hazardous Waste Permit Information Form (Part A permit application) except as prohibited in Condition V.B.1.b.
- V.B.1.b.** The burning of the following waste is prohibited:
- V.B.1.b.(1).** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.
 - V.B.1.b.(2).** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.
 - V.B.1.b.(3).** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.
 - V.B.1.b.(4).** Municipal Waste.
 - V.B.1.b.(5).** Containerized Gases.
 - V.B.1.b.(6).** Medical/Infectious wastes as defined in 40 CFR 60.51.c.
- V.B.1.c.** Before burning any wastes not authorized under this permit, the permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.
- V.B.1.d.** Open burning of hazardous waste is prohibited except for the open burning and detonation of waste explosives. Waste explosives include waste which has the potential to detonate and bulk military propellants which cannot safely be disposed of through other modes of treatment. (LAC 33:V.4533)

V.B.2. Inspections

V.B.2.a. Requirements

- V.B.2.a.(1).** The permittee shall inspect the EOD unit and instrumentation in accordance with the inspection schedule submitted in the Inspection Plan (see Attachment 1).
- V.B.2.a.(2).** Any associated equipment (pumps, valves, pipes, fuel storage tanks, and other ancillary equipment), if present, shall be subject to a daily thorough, visual inspection, when they contain hazardous waste. The

purpose of these inspections will be to identify leaks, spills, fugitive emissions, and signs of tampering.

V.B.2.b. Records

Written inspection records shall be part of the operating record for this permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection, (2) inspector's name, (3) any inspection observations, and (4) date and nature of corrective action. The inspection record shall be completed in accordance with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

V.B.3. Regulation Of Residues

The permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3025.

V.B.4. Closure

The permittee shall close this facility in accordance with LAC 33:V.3005.1 and the Closure Plan referenced in Attachment 1.

V.C. SPECIFIC OPERATING CONDITIONS FOR THE OB/OD

The OB/OD shall be subject to the following provisions and operating conditions.

V.C.1. Performance Standards

The unit authorized to conduct open burning/open detonation of explosives by this permit must be located, designed, constructed, operated, maintained and closed in a manner that will ensure protection of human health and the environment. In accordance with LAC 33:V.3203, this section contains detection and monitoring requirements necessary to demonstrate that no releases to soil, surface water, ground water wetlands, or air, are occurring which may have an adverse impact on human health or the environment. Additional authorities for this section are contained in LAC 33:V.3321 and LAC 33:V.3322.

V.C.1.a. Release Detection and Delineation Monitoring Approach

It is the intent of this permit that a monitoring approach be implemented to determine whether a release of hazardous constituents to the environment has occurred, and if so, to delineate the extent of the release. If a significant release is found to have occurred, the permittee shall be required to submit a release delineation work plan to evaluate the risks to human health and the environment, including characterization of current emissions, which shall be used to determine whether operating modifications to the unit and/or corrective actions to address the releases are necessary.

This permit outlines the use of environmental media sampling to determine whether significant releases from past and present operations have occurred. In addition to the monitoring approach, if releases to the environment are confirmed, the permittee may be required to conduct emission monitoring studies, or change the operational design or procedures of the unit, or to take other actions determined to be necessary to protect human health and the environment.

V.C.1.b. Release Detection: Monitoring Work Plan Submittal

Within 180 days of the effective date of this permit, the permittee must submit a Monitoring Work Plan. The Monitoring Work Plan shall be designed to determine whether releases of hazardous constituents to the environment are occurring and shall include the following:

V.C.1.b.(1). A complete list of hazardous constituents identified in the Waste Analysis Plan as having been historically treated in the unit, or expected to be treated in the unit in the future, in accordance with Condition III.C;

V.C.1.b.(2). Media Specific Screening Levels (MSSL's) for each hazardous constituent, appropriate for industrial and residential soils, surface waters, and ground waters, as contained in the Louisiana Risk

Evaluation Corrective Action Program (RECAP) or other appropriate regulatory authorities, as well as available Ecological Screening Levels (ESL's);

V.C.1.b.(3). A Quality Assurance Project Plan which includes the data quality objectives and procedures used to ensure that sample collection, handling and analyses are performed in a technically sound manner, including Standard Operating Procedures (SOP's) describing anticipated sampling activities;

V.C.1.b.(4). Proposed locations for collecting samples, including locations directly adjacent to the OB/OD unit, and other areas subject to influence by the operation of the unit, as described below:

- Composite surface soils from multiple locations within the immediate area around the treatment pad. These samples shall be analyzed for each hazardous constituent identified in the Waste Analysis Plan as having been historically treated in the unit, or expected to be treated in the unit in the future;
- Composite surface soils at multiple locations across the site, to be selected based on historical sampling locations, surface water drainage patterns, and wind rose data. These samples shall be analyzed for each hazardous constituent identified in the Waste Analysis Plan as having been historically treated in the unit, or expected to be treated in the unit in the future.

V.C.1.b.(5). A Monitoring Schedule, which shall include:

- Quarterly monitoring for all constituents at all locations in the Monitoring Work Plan;
- Sampling Event Report(s) to be submitted annually, and
- Acknowledgment that the monitoring schedule will be implemented no later than sixty (60) days after approval of the Monitoring Work Plan.

V.C.1.b.(6). A Sampling Event Report shall utilize the following format, which will include but not be limited to:

- Field collection activities and any variations from sampling plans;
- Analytical results, presented in summary tables of detections in the body of the report, with those values

exceeding any MSSL's, ESL's or background concentrations (for metals) in bold type, and complete analytical data documentation in the appendices;

- A discussion of any QA/QC problems;
- Maps depicting the location and distribution of any hazardous constituents detected (other than naturally occurring metals at concentrations below background levels);
- Historical data trend analyses;
- A statement of whether releases have been detected (or are above background for metals) and thus implementation of release delineation monitoring is required per Condition V.C.1.e., and if so, whether such detections exceed MSSL's or ESL's.

V.C.1.b.(7). A map of the facility identifying all areas which the facility anticipates may be closed (at the time the treatment unit is closed) to a land-use standard other than residential. The permittee should consider that such non-residential closures may require protection of human health and the environment.

V.C.1.b.(8). The Release Detection Monitoring Workplan shall incorporate the "EOD Range Groundwater Sampling Workplan" dated May 10, 2010, and the "45th EOD Range Groundwater Monitoring Program" dated October 10, 2001 (or most recent approved versions).

V.C.1.c. Changes in Frequency of Monitoring

The permittee may request a Class 1¹ permit modification to reduce the required sampling frequency to once per year for any constituent which was not detected (or in the case of metals, which was not detected above background levels) for four (4) consecutive quarterly sampling events. Any other requests for changes in frequency of monitoring will be evaluated by the Administrative Authority to determine if the request is a Class 1¹, 2, or 3 permit modification.

V.C.1.d. Release Detection Monitoring Program

The Monitoring Work Plan, when implemented, shall constitute the facility's Release Detection Monitoring Program. Monitoring shall continue regardless of the permittee's future implementation, if necessary, of a Release Delineation Monitoring Program, or Risk Evaluation and Emission Characterization Program.

V.C.1.e. Release Delineation Monitoring Program

If hazardous constituents (other than naturally occurring metals at concentrations below background levels) are detected during the Release Detection monitoring activities, the permittee shall submit a Release Delineation Work Plan. The Release Delineation Work Plan shall propose a plan to delineate the detected release(s). The Release Delineation Work Plan shall be submitted no later than ninety (90) days after the permittee notifies the Administrative Authority of such detection(s). The Release Delineation Work Plan shall include, but not be limited to:

V.C.1.e.(1). Maps depicting the current and, if appropriate, historical location(s) and distribution of any hazardous constituent(s) detected (other than naturally occurring metals at concentrations below background levels);

V.C.1.e.(2). Proposed sample locations and analyses to delineate the detected releases in each media;

V.C.1.e.(3). Proposed sample types and locations to evaluate whether contamination has migrated into another media;

V.C.1.e.(4). For each hazardous constituent detected, the Media Specific Screening Levels (MSSL's) appropriate for industrial and residential soils, surface waters, and ground waters (i.e., drinking water Maximum Contaminant Levels (MCLs), when available), as contained in the Louisiana RECAP program or other appropriate regulatory authorities (e.g., surface water quality standards), as well as available Ecological Screening Levels (ESL's);

V.C.1.e.(5). Any required changes to the Quality Assurance Project Plan;

V.C.1.e.(6). A proposed schedule for implementing field activities;

V.C.1.e.(7) A proposed schedule for submitting interim progress reports at least every six (6) months;

V.C.1.e.(8). A Release Delineation Report shall utilize the following format, including but not limited to:

- Field collection activities and any variations from sampling plans;
- Analytical results, presented in summary tables of detections in the body of the report, with those values exceeding any MSSL's, ESL's or background concentrations (for metals) in bold type, and complete analytical data documentation in the appendices;
- A discussion of any QA/QC problems;
- Maps depicting the location and distribution of any hazardous constituents detected (other than naturally occurring metals at concentrations below background levels);

- Historical data trend analyses;
- A statement of whether releases exceeding MSSL's or ESL's have occurred and whether implementation of Risk Evaluation is required.

V.C.1.e.(9). A map of the facility identifying all areas that the facility anticipates may be closed (at the time the treatment unit is closed) to a land-use standard other than residential. The permittee should consider that such nonresidential closures may require ongoing obligations to ensure protection of human health and the environment.

V.C.1.e.(10). Any proposed modifications to the Release Detection Monitoring Program.

V.C.1.f. Risk Evaluation and Emissions Characterization Program

If the Release Delineation Monitoring Program indicates that a release of hazardous constituents to the environment has occurred at concentrations exceeding appropriate MSSL's or ESL's, the permittee shall be required to implement a Risk Evaluation and Emissions Characterization program to evaluate risks to human health and the environment. All risk evaluations shall be in compliance with RECAP. The Administrative Authority will determine if additional requirements are necessary during the review process of the Risk Evaluation and Emissions Characterization Program. Permittee must submit a report detailing all Risk Evaluation and Emissions Characterizations activities, including but not limited to:

- V.C.1.f.(1).** Direct characterization of the emissions from operations of the open burning/open detonation unit, or performance of an acceptable alternative study;
- V.C.1.f.(2).** A projection of future environmental concentrations from continuing the treatment operations;
- V.C.1.f.(3).** Evaluation of risks to human health and the environment from current and projected future concentrations;
- V.C.1.f.(4).** Development of design and/or operational changes to reduce releases from the unit;
- V.C.1.f.(5).** Evaluation of whether corrective actions are required to address contaminated media.

VI. GROUND WATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., of the Act, La. R.S. 30:2001 et seq., and the provisions of this Condition shall apply to ground water protection programs for facilities that are used to treat, store, and/or dispose hazardous wastes at Fort Polk in Fort Polk, Vernon Parish, Louisiana.

VI.B. REQUIRED PROGRAMS

The permittee shall comply with the monitoring, response, and corrective action provisions for the existing and any new systems in accordance with LAC 33:V.Subpart 1.

VI.C. GROUNDWATER PROTECTION STANDARD

If additional ground water contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as directed by the Administrative Authority. Permittee shall continue to conduct groundwater monitoring in accordance with the "EOD Range Groundwater Sampling Workplan" (Sampling Workplan) dated May 10, 2010, (or most updated approved version) and the "45th EOD Range Groundwater Monitoring Program" (Monitoring Program) dated October 10, 2001, (or most updated approved version), as referenced in Attachment 1. The Sampling Workplan and the Monitoring Program contain the approved conditions and specifications for groundwater monitoring, including but not limited to: well locations, designations, sampling parameters, sampling frequency, groundwater constituents of concern for the EOD Range OB/OD unit and statistical procedures for analyzing data collected for the EOD Range (OB/OD miscellaneous unit).

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the permittee to be economically practicable; and that the proposed method of treatment, storage, or practicable disposal method that is currently available to the permittee minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on the EPA website at www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this permit do not constitute a reissuance of the permit.

VII.A.5. Permit Review

This permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.321.C. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the permittee meets such standards and other applicable conditions of this permit.

VII.A.7.b. The permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The permittee shall review the waste analysis plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

VII.A.8. Information Submittal for the Corrective Action Strategy

Failure to comply with any condition of the permit, including information submittals, constitutes a violation of the permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this permit (LAC 33:V.323.B.3).

The permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the corrective action strategy must conform to those requirements outlined in the RECAP (see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under the RECAP shall be requested by the permittee prior to submittal to the Administrative Authority, or as deemed necessary. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

**Louisiana Department of Environmental Quality
Office of Environmental Assessment
Remediation Services Division
P.O. Box 4314
Baton Rouge, LA 70821-4314**

A summary of the planned reporting milestones pursuant to the corrective action requirements of this permit is found in Condition VIII, Table 1.

VII.A.9. Data Retention

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 permit shall be maintained at the facility during the term of this permit, including any reissued permits.

VII.A.10. Management of Wastes

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process.

VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB-CC AIR REGULATIONS)

(RESERVED)

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the permittee shall close all closing units, if any, in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The permittee shall perform unit closures in accordance with the closure plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action for a release area. The permittee shall use the CAS approach as the framework for corrective action for any new releases, to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP)** for screening and media-specific cleanup standards, and No Further Action (NFA) determinations. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP.

Use of the CAS process is required for any new releases which have to be reported under the LA RECAP reporting requirements and are unable to be managed using the self-implementation process referred to in RECAP. The use of the CAS process is also required for any and all new releases that exceed the reportable quantity reporting requirements in LAC 33:1 Office of the Secretary.

The permittee is currently conducting corrective action, investigation, and/or monitoring of the units listed in Appendix 1.

VIII.A. ALTERNATE CORRECTIVE ACTION

VIII.A.1. Introduction to CAS

The permittee will utilize the CAS Guidance Document (www.epa.gov/Arkansas/6pd/rcra_c/pd-o/riskman.htm) developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP standards and/or screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Appendix 1 of this permit contains a summary of corrective action activities completed to date and also describes where the permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the permittee is in the CAS process as detailed in Appendix 1.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMI, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the permittee and the Administrative Authority. The

Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

VIII.A.2. Performance Standards

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c. The permittee's proposed performance standards shall be presented during the scoping meeting. The permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.

The permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the permittee.

VIII.A.2.a. Source Control Performance Standard

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The permittee must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

VIII.A.2.b. Statutory and Regulatory Performance Standard

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking

water) that must be achieved and may become a performance standard for the permittee.

VIII.A.2.c. Final Risk Goal Performance Standard

The final risk goal is the level of protection to be achieved and maintained by the permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).

VIII.A.3. Use of RECAP

The latest edition of the RECAP document shall be used by the permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

The RECAP shall be used by the permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

The RECAP shall be used by the permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

The RECAP shall be used by the permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

[Note: Condition VIII.A.3 need not be applied to corrective action activities that have already been completed to satisfaction of the administrative authority except when warranted by new information and/or data (not available to the Administrative Authority at the time it rendered decisions regarding the specific measures and/or activities) relevant to the previously-approved corrective action activities.]

VIII.A.3.a. Screening Option

The permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

VIII.A.3.b. Management Option 1

The permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

VIII.A.3.c. Management Option 2

The permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

VIII.A.3.d. Management Option 3

The permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

VIII.A.4. Corrective Action for Releases Beyond Facility Boundary

Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the permittee demonstrates that, despite the permittee's best efforts, the permittee was unable to obtain the necessary permission to undertake such actions. The permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VIII.A.5. Financial Responsibility (RESERVED)

VIII.A.6. Summary of Corrective Action Activities

A summary of the corrective action activities associated with the facility is provided in Condition VIII, Appendix 1 of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Condition VIII, Appendix 1 of this permit.

VIII.A.7. Approval of Alternate Schedule

The permittee may submit a written request for an alternate schedule for a submittal deadline as presented in Condition VIII, Table 1. The request should propose a specific alternate schedule and include an explanation as to why the alternate schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternate schedule.

VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING

VIII.B.1. Notice of Intent

For new releases not referenced in Appendix 1, the permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS within sixty (60) days of the effective date of this permit. The notice of intent should state the following in a concise manner:

VIII.B.1.a. General information regarding facility location;

VIII.B.1.b. General information regarding the facility's operational history;

VIII.B.1.c. General discussion on how the permittee will proceed through the CAS;

VIII.B.1.d. Brief description of proposed performance standards for corrective action; and

VIII.B.1.e. Propose a date for a scoping meeting between the permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

VIII.B.2. Scoping Meeting

The scoping meeting will serve as the first CAS milestone where the permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the permittee will present the following information to the Administrative Authority:

VIII.B.2.a. A conceptual site model (if one already has been developed);

VIII.B.2.b. Discussions on history of corrective action at the facility, including facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

VIII.B.2.c. Proposed performance standards for the facility with justification, and potential risk management approaches;

VIII.B.2.d. Discussions on how the permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

VIII.B.2.e. A Communication Strategy Plan that specifies where in the CAS process the permittee is currently and how the permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

VIII.B.2.f. Site-specific concerns (i.e., sensitive environments or special subpopulations);

VIII.B.2.g. Need for interim measures or stabilization activities, if necessary; and

VIII.B.2.h. Schedule for submittal of the CAS Investigation Work plan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the permittee during the corrective action process can be referenced during the scoping meeting. The permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

VIII.C. REPORTING REQUIREMENTS

VIII.C.1. The permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this permit as required by the Administrative Authority. The reporting schedule shall be determined on a case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

VIII.C.1.a. A description of the work completed and an estimate of the percentage of work completed;

VIII.C.1.b. Summaries of all findings, including summaries of laboratory data;

VIII.C.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VIII.C.1.d. Projected work for the next reporting period;

VIII.C.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VIII.C.1.f. Changes in key project personnel during the reporting period; and

VIII.C.1.g. Summaries of all changes made in implementation during the reporting period.

VIII.C.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

VIII.C.3. In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action work plans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)

No later than 120 days after the scoping meeting, the permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing

background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:1.Chapter 13). The permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the "base document" to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority.

The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

VIII.D.1. Facility Profile

The permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.1.a.(1) General geographic location;

VIII.D.1.a.(2) Property lines with the owners of all adjacent property clearly indicated;

VIII.D.1.a.(3) Facility structures, process areas and maintenance areas;

VIII.D.1.a.(4) Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

VIII.D.1.a.(5) Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

VIII.D.1.b. The Facility Profile shall also include a description of ownership and operation of the facility.

VIII.D.1.c. The permittee shall provide pertinent information for those spills that have not been assessed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

VIII.D.2. Land Use and Exposure Profile

The permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

VIII.D.2.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.2.a.(1) Surrounding land uses, resource use locations, and natural resources/wetlands;

VIII.D.2.a.(2) Locations of sensitive subpopulations; and

VIII.D.2.a.(3) An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS example) of the RECAP.

VIII.D.3. Physical Profile

The permittee shall include in the CSM a physical profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The physical profile shall include:

VIII.D.3.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.3.a.(1) Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

VIII.D.3.a.(2) Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

VIII.D.3.a.(3) Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

VIII.D.3.a.(4) Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

VIII.D.3.a.(5) Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

VIII.D.3.a.(6) Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

VIII.D.4. Release Profile

The permittee shall include in the CSM a release profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The release profile shall include:

VIII.D.4.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.4.a.(1) Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

VIII.D.4.a.(2) Isopleth maps depicting lateral extent and concentrations of COCs;

VIII.D.4.a.(3) Results of fate and transport modeling showing potential exposure concentrations and locations; and

VIII.D.4.a.(4) Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

VIII.D.4.b. Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

VIII.D.4.c. Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photo degradation rates, hydrolysis rates, chemical transformations).

VIII.D.5. Ecological Profile

The permittee shall include in the CSM an ecological profile that shall describe the physical relationship between the developed and undeveloped portions of the facility.

the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the ecological profile, current, as well as, future impacts to receptors and/or their habitats shall be considered. The ecological profile shall include:

VIII.D.5.a. A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

VIII.D.5.b. A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

VIII.D.5.c. A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

VIII.D.5.d. A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

VIII.D.5.e. An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of the RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

VIII.D.6. Risk Management Profile

The permittee shall include in the CSM a risk management profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The risk management profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The risk management profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The risk management profile shall include:

VIII.D.6.a. A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

VIII.D.6.b. A list of identified site-wide data gaps for further investigation.

VIII.D.6.c. Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the permit. This documentation shall

include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

VIII.E. INTERIM MEASURES

VIII.E.1. If at any time during the term of this permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Work plan. The Administrative Authority may modify this permit according to LAC 33:V.321 to incorporate interim measures into the permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

VIII.E.2. The permittee may propose interim measures at any time by submittal of an Interim Measures Work plan subject to the approval of the Administrative Authority.

VIII.E.3. The Administrative Authority shall notify the permittee in writing of the requirement to perform interim measures and may require the submittal of an interim measures work plan. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VIII.E.3.a. Time required to develop and implement a final remedy;

VIII.E.3.b. Actual and potential exposure to human and environmental receptors;

VIII.E.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;

VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

VIII.E.3.g. Weather conditions that may affect the current levels of contamination;

VIII.E.3.h. Risks of fire, explosion, or accident; and

VIII.E.3.i. Other situations that may pose threats to human health and the environment.

VIII.E.5. Upon approval of the interim measures work plan and completion of the interim measure(s) implementation, the permittee will submit a report to the Administrative Authority describing the completed work.

VIII.E.6. At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the permittee to submit the SWMUs/AOCs for further corrective action.

VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN

VIII.F.1. The CAS investigation work plan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the permittee and the Administrative Authority. The CAS investigation work plan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.

[Note: Condition VIII.F need not be applied to corrective action activities that have already been completed to the satisfaction of the administrative authority except when warranted by new information and/or data (not available to the Administrative Authority at the time it rendered decisions regarding the specific measures and/or activities) relevant to the previously-approved corrective action activities.]

VIII.F.1.a. The CAS investigation work plan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS investigation work plan is required to have DQOs that are developed to support the performance standard for each release.) The CAS investigation work plan 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 site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

VIII.F.1.b. The CAS investigation work plan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

VIII.F.1.c. Development of the CAS investigation work plan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

VIII.F.1.c.(1). Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

VIII.F.1.c.(2). Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;



VIII.F.1.c.(3). Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

VIII.F.1.c.(4). Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

VIII.F.1.c.(5). Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

VIII.F.1.c.(6). 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

VIII.F.1.c.(7). RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

VIII.F.1.c.(8). Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3rd Edition. November 1992, with revisions;

VIII.F.1.c.(9). The LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems,** prepared by the LDEQ and the Louisiana Department of Transportation and Development, May 2000, or most recent version. This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

VIII.F.1.c.(10). The LAC 33:1.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

VIII.F.2. After the permittee submits the CAS investigation work plan, the Administrative Authority will approve, disapprove, or otherwise modify the CAS investigation work plan in writing. All approved work plans become enforceable components of this permit.

In event of disapproval (in whole or in part) of the work plan, the Administrative Authority shall specify deficiencies in writing. The permittee shall modify the CAS investigation work plan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified work plan shall be submitted in writing to the Administrative Authority for review. Should the permittee take exception to all or part of the disapproval, the permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

VIII.F.3. The Administrative Authority shall review for approval, as part of the CAS investigation work plan or as a new work plan, any plans developed pursuant to Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS

No later than fourteen (14) days after the permittee has received written approval from the Administrative Authority for the CAS investigation work plan, the permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS investigation work plan and the following:

VIII.G.1. The permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

VIII.G.2. Deviations from the approved CAS investigation work plan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

VIII.H. RECAP REPORT

Within ninety (90) days after completion of the site investigation the permittee shall submit a RECAP report to the Administrative Authority for approval. The RECAP report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP report does not fully meet the objectives stated in the CAS Investigation Work plan (permit Condition VIII.F), the Administrative Authority shall notify the permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised final report to the Administrative Authority.

VIII.H.1. The permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

VIII.H.2. The report shall include, but not be limited to, the following:

VIII.H.2.a. Documentation of site investigation activities and results;

VIII.H.2.b. Evaluation of exposure scenarios to document impacts from releases;

VIII.H.2.c. Deviations from the CAS Investigation Work plan;

VIII.H.2.d. Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

VIII.H.2.e. The revised CSM with updated profiles which incorporate investigation and screening results; and

VIII.H.2.f. Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

VIII.I. REMEDIAL ALTERNATIVES STUDY

Upon completion and approval of the RECAP Report, the permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

VIII.I.1. The permittee shall evaluate remedies for each AOI that shall:

VIII.I.1.a. attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

VIII.I.1.b. control sources of releases;

VIII.I.1.c. meet acceptable waste management requirements;

VIII.I.1.d. protect human health and the environment; and

VIII.I.1.e. meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

VIII.I.2. The permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

VIII.I.3. The permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

VIII.I.4. If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

VIII.I.5. The RAS shall at a minimum include:

VIII.I.5.a. An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

VIII.I.5.b. An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

VIII.I.5.d. An assessment of the costs of implementation for potential remedies;

VIII.I.5.e. An assessment of the time required to begin and complete the remedy;

VIII.I.5.f. An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

VIII.I.5.g. An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

VIII.I.6. The Administrative Authority will review and evaluate the RAS and provide the permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In addition, the Administrative Authority may require the permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J. RISK MANAGEMENT PLAN

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

VIII.J.1. The Risk Management Plan shall at a minimum include:

VIII.J.1.a. A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

VIII.J.1.b. The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

VIII.J.1.c. Cost estimates and implementation schedules for proposed final remedies;

VIII.J.1.d. Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;

VIII.J.1.e. Remedy performance criteria and monitoring:

The permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical

analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

VIII.J.1.f. Contingency plans; and

VIII.J.1.g. Description and schedules for performance reviews.

VIII.J.2. After the permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

VIII.J.3. If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J.4. After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the permittee in writing and instruct the permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.J.5. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.J.6. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.3 of this permit.

VIII.J.7. If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification. The resultant modified permit will include schedules for remedy implementation.

VIII.K. DETERMINATION OF NO FURTHER ACTION

VIII.K.1. NFA-ATT DETERMINATIONS FOR SPECIFIC SWMUs/AOCs

VIII.K.1.a. Based on the results of the site investigations, screening, risk evaluations and risk management activities, the permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification (¹ requiring Administrative Authority approval) request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

VIII.K.1.b. If, based upon review of the permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

VIII.K.1.c. In accordance with LAC 33:V.321.C.1.a.ii, the permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1¹ permit modification (¹ requiring Administrative Authority approval) request.

VIII.K.2. FACILITY-WIDE NFA-ATT DETERMINATION

VIII.K.2.a. Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

VIII.K.2.b. The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

VIII.K.2.c. The Administrative Authority will review and evaluate the summary report and subsequently either inform the permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

VIII.K.2.d. If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

VIII.K.2.e. After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the permittee in writing and instruct the permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.K.2.f. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.K.2.g. If, based upon review of the permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

VIII.K.2.h. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

VIII.K.2.i. If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

VIII.K.3. CONTINUED MONITORING

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific

circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

VIII.K.4. ADDITIONAL INVESTIGATIONS

A determination of NFA-ATT shall not preclude the Administrative Authority 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/AOC at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the permit according to LAC 33:V.321.

VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs

VIII.L.1. The permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VIII.L.1.a. The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

VIII.L.1.b. The type and function of the unit;

VIII.L.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VIII.L.1.d. The period during which the unit was operated;

VIII.L.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VIII.L.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU/AOC.

VIII.L.2. Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the permittee in writing and request that the permittee submit a Class 1¹ permit modification (¹requiring Administrative Authority approval) request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC to Appendix 1, Table 1 of this permit.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the permittee to prepare a plan for such investigations. The plan for investigation of SWMU or AOC will be reviewed for approval as part of the current CAS Investigation Work plan or a new CAS Investigation Work plan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC

The permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Work plan or a new CAS Investigation Work plan. The permit will be modified to incorporate the investigation, according to the Class 1¹ permit modification (¹requiring Administrative Authority approval) procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

VIII.N. PUBLIC PARTICIPATION REQUIREMENTS

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained

in any draft permitting decisions or draft permit modification documents and the associated plans and reports submitted by the permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.). At a minimum, the public participation requirements shall include the following.

VIII.N.1. NFA-ATT Determinations for Specific SWMUs/AOCs

Based on the results of the site investigations, screening, risk evaluations and risk management activities, the permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification request (¹ requiring Administrative Authority approval) under LAC 33:V.321.C.1. The permittee must notify the facility mailing list within 90 days of the Administrative Authority's approval of the Class 1¹ permit modification request, in accordance with LAC 33:V.321.C.1.a.ii and Condition VIII.K.1.c of this permit.

VIII.N.2. Draft Permitting Decision

The public may review and comment on the terms and conditions of the CAS during the public notice and comment period of the draft permitting decision. The Administrative Authority shall issue public notice upon preparation of the draft permitting decision in accordance with LAC 33:V.715. During the forty-five (45) day public comment period, the Administrative Authority will accept public comments on the draft permitting decision. At the end of the public comment period, the Administrative Authority will consider and address all public comments and make any necessary revisions to the draft permitting decision. After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permitting decision. The final permitting decision will include a "Responsiveness Summary" detailing all comments received on the draft permitting decision and the actions taken (if necessary) to correct the draft before issuance of the final permitting decision.

VIII.N.3. Final Remedy Selection

The public may review and comment on the terms and conditions of the Risk Management Plan as described in Conditions VIII.J.4 through VIII.J.7 of this permit. If after addressing all public comments the Administrative Authority determines that the Risk Management Plan is satisfactory, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will identify the proposed remedy for corrective action at the site and the reasons for its selection, describe all other remedies that were considered, and solicit for public review and comments on the Risk Management Plan included in the draft permit modification document.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

VIII.N.4. Facility-Wide NFA-ATT

Upon the completion of all activities specified in the Risk Management Plan and after all facility remedial objectives have been met, the permittee may submit a summary report for a determination of NFA-ATT on a facility-wide basis in accordance with Condition VIII.K.2 of this permit. The public may review and comment on the summary report as described in Condition VIII.K.2.b. If after addressing all public comments the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will provide a summary detailing contamination sources, site investigations, the MO selected for the facility, facility remedial standards, remedial actions, and sampling results demonstrating that the facility remedial standards have been achieved.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

VIII.O. DISPUTE RESOLUTION

The Permittee must follow the procedures detailed in Conditions VIII.O.1 through VIII.O.6 below to dispute a judgment by or requirement from the Administrative Authority regarding the corrective action requirements of this permit. For purposes of dispute resolution, the Administrative Authority is the Assistant Secretary of LDEQ's Office of Environmental Services. Such actions that may be disputed include, but are not limited to: the requirements under Conditions VIII.L and M; implementation of work plans; approval of documents; scheduling of any work; or selection, performance, or completion of any corrective action. The Permittee's failure to follow the procedures set forth in Condition VIII.O will constitute a waiver of its right to further consider the dispute.

VIII.O.1. The parties (i.e., the LDEQ and the Permittee) shall use their best efforts to informally and in good faith resolve all disputes or differences of opinion. If, however, disputes arise concerning the corrective action which the parties are unable to resolve informally, the following procedures shall apply. If the Permittee disputes its ability to meet a specific deadline or directive, then the Permittee is obligated to advise the

Administrative Authority of the issue at least 14 days in writing in advance of the deadline.

VIII.O.2. The Administrative Authority shall provide the Permittee written notice of its disapproval or modification within 30 days. The written notice of disapproval or modification shall set forth the reasons for the disapproval or modification.

VIII.O.3. If the Permittee disagrees, in whole or in part, with any such written notice, the Permittee shall notify the Assistant Secretary of LDEQ's Office of Environmental Services, in writing, within 14 days of receipt of the written notice.

VIII.O.4. The Permittee and the pertinent LDEQ staff shall use their best efforts to informally and in good faith resolve the dispute. Accordingly, the Permittee is entitled to meet with LDEQ staff in person at the Administrative Authority's office or by teleconference, if it so desires, in order to resolve the dispute.

VIII.O.5. If the Permittee and the LDEQ staff are unable to resolve the dispute, the Permittee may make a written request for a final decision by the Administrative Authority. The written statement should include, at a minimum, the specific points of dispute, the position the Permittee maintains should be adopted as consistent with the Permit requirements and the basis therefore, any matters which it considers necessary for proper determination of the dispute, and whether the Permittee requests an informal conference in front of the Administrative Authority.

VIII.O.6. Subsequently, the Administrative Authority will issue a final decision within 30 days of the request.

Table 1: Corrective Action Strategy Notification and Reporting Requirements

Below is a summary of the major notifications and reports that may be required by the Administrative Authority under the Corrective Action Strategy of this permit in the event of releases requiring RCRA corrective action. The Administrative Authority will notify the permittee of the notification and reporting requirements during the scoping meeting or another applicable stage of the corrective action process. For AOCs identified in Appendix 1 some activities may have been accomplished, such as investigation, interim measures, corrective action, source removal actions and/or groundwater remedial actions. For the AOCs identified in Appendix 1, the required action and/or due dates may vary. Applicable actions for the AOCs listed in Appendix 1 will be determined during the CAS Scoping Meeting. The Notification and Reporting requirements listed below will be required for new releases.

ACTION	DUE DATE
Submit Notice of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)	Within sixty (60) days of the effective date of this permit (if facility corrective action is required)
CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)	Within sixty (60) days of submittal of the Notice of Intent
Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)	Schedule to be determined by the Administrative Authority on a case-by-case basis
Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)	Upon request of the Administrative Authority
Provide briefings to the Administrative Authority (Condition VIII.C.3)	As necessary and upon request by the Administrative Authority
Submit Conceptual Site Model (CSM) (Condition VIII.D) and facility Performance Standards (Condition VIII.A.2) to the Administrative Authority	Within one-hundred and twenty (120) days after the scoping meeting
Perform Interim Measures (Condition VIII.E)	As determined by the Administrative Authority on a case by case basis
Submit Corrective Action Strategy (CAS) Work plan for the facility investigation to the Administrative Authority (Condition VIII.F)	Within one-hundred and eighty (180) days after the CAS Scoping Meeting
Implement site investigation activities under CAS Investigation Work plan according to approved schedule (Condition VIII.G)	Within fourteen (14) days of receipt of approval by the Administrative Authority
Submit RECAP Report to the Administrative Authority (Condition VIII.H)	Within ninety (90) days of completion of the site investigation
Submittal of Remedial Alternatives Study (RAS) to the Administrative Authority (Condition VIII.I)	Within ninety (90) days of completion of approval of the RECAP Report by the Administrative Authority
Submit Risk Management Plan to the Administrative Authority (Condition VIII.J)	Within sixty (90) days of approval of the RAS by the Administrative Authority
Submit requests for unit specific and facility-wide NFA-ATT determinations to the Administrative Authority (Condition VIII.K)	As necessary
Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)	Thirty (30) days after discovery
Notification of newly-discovered releases (Condition VIII.M)	According to the requirements of Conditions II.E.16 through II.E.20 of this permit

APPENDIX 1

TABLE 1 AND TABLE 2: SUMMARY OF CURRENT CORRECTIVE ACTION ACTIVITIES AND HISTORICAL AREAS OF INTEREST AND NO FURTHER ACTION AREAS

The intent of Appendix 1 is to provide an overview of the history and current status of the corrective action process at the site at the time of issuance of the final permit and may not necessarily provide a definitive regulatory determination for a particular SWMU or AOC. The classification of an individual SWMU or AOC is subject to change by the Administrative Authority based on future geological/hydrogeological conditions and future available information available to the Administrative Authority.

TABLE 1. SUMMARY OF CORRECTIVE ACTION ACTIVITIES ON-GOING

AOC or SWMU Number	AOC/SWMU Description	Status of Corrective Action
17	Mill Creek Landfill	CERCLA: Remedy Complete: First 5 year review under CERCLA 121 conducted in August, 2009
21	Construction Debris Landfill	CERCLA: Remedy Complete: First 5 year review under CERCLA 121 conducted in August, 2009
23	2600 Block Vehicle Maintenance Units	CERCLA: Corrective Measures Implementation Plan was approved in October 2008. Source removal was completed in August 2009. The site is presently under Long Term Management.

TABLE 2: Historical SWMUS/AOIs that have received a No Further Action designation, or for which No Further Action designation is in progress:

AOC or SWMU Number	AOC/SWMU Description	Status of Corrective Action
7	Chemical Agent Burial Site	NFA'D ² : 28029510 ¹ 7/08/2003
8	Former Burning Ground	To be NFA ²
19	Chaffee Road Landfarm and Run-off Pond	Closure Certification received 12/05/2008, groundwater and soils meet RECAP MO-I non-industrial standards. Formerly SW permit P-0070; closure verification to be conducted
20	Bayou Zourie Landfill	To be NFA ²
24	2700 Block Vehicle Maintenance Units	To be NFA ²
25	2800 Block Vehicle Maintenance Units	NFA'D ² : 47183618 ¹ 04/29/2010
26	2900 Block Vehicle Maintenance Units	To be NFA ²
28	3100 Block Vehicle Maintenance Units	NFA'D ² : 44930716 ¹ 1/04/2010
29	3200 Block Vehicle Maintenance Units	NFA'D ² : 27956129 ¹ 8/08/2003
32	DEH Paint Booth and Paint Waste SAPs	To be NFA ²
33	3500 Block Vehicle Maintenance Units	To be NFA ²
34	3600 Block Vehicle Maintenance Units	To be NFA ²
35	3800 Block Vehicle Maintenance Units	NFA'D ² : 33593373 ¹ 11/01/2005
37	4300 Block Vehicle Maintenance Units	NFA ² in progress
38	Former Firefighter Training Area	To be NFA ²
40	Southeastern 4500 Block Directorate of Logistics vehicle Maintenance Units	To be NFA ²
41	Northwestern 4500 Block Directorate of Logistics Vehicle Maintenance Units	To be NFA ²
42	Original Firefighter Training Area	To be NFA ²

TABLE 2 (continued): Historical SWMUS/AOIs that have received a No Further Action designation, or for which No Further Action designation is in progress:

AOC or SWMU Number	AOC/SWMU Description	Status of Corrective Action
44	DOL Paint Booth and Paint SAP	NFA ¹ D ² : 32544596 ¹ 10/27/2004
45	DOL Battery Reclamation Unit	NFA ¹ D ² : 33106026 ¹ 7/13/2005
46	4600 Block Vehicle Maintenance Unit	NFA ² in progress
47	4700 Block Vehicle Maintenance Units	NFA ¹ D ² : 45954953 ¹ 02/23/2010
48	South Fort Polk Heavy Vehicle Prewash Facility Wash Rack and Lagoons	To be NFA ²
50	South Fort Polk Wastewater Lagoon	NFA ¹ D ² : 43768447 ¹ 10/19/2009
53	Aviation Maintenance Area Units	To be NFA ²
56	North Fort Polk Heavy Vehicle Pre-wash Facility Wash Rack and Lagoons	To be NFA ²
AOC 2	Avenue K Mogas Site	To be NFA ²
AOC 3	4600 Block Fuel Pump Island	NFA ¹ D ² : 33900920 ¹ 1/26/2006

¹ Electronic Data Management System (EDMS) document number.

² NFA: No Further Action required at this time; AOC/SWMU does not require additional field work or environmental monitoring.

ATTACHMENT
1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
LA0 214 022 725-OP-RN-1
AI # 8994

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID¹	COMMENTS
Contingency Plan	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix C
Waste Analysis Plan	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix A
Personnel Training Plan	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix D
Facility Inspection Plan	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix B
Closure Plan	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix E
Groundwater Monitoring Program	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix F
45 th EOD Range Groundwater Monitoring Program	01/01/1997	6995228	Groundwater monitoring program for the RCRA permitted OB/OD Unit, dated 01/01/1997, approved 10/10/2001
2010 EOD Range Groundwater Sampling Workplan	05/10/2010	47336217	Groundwater sampling plan for the RCRA permitted OB/OD Unit, incorporating the "45 th EOD Range Groundwater Monitoring Program."
Contingent Post-closure Plan	12/05/2008	38914326	Renewal Application; Attachment 6, Appendix G

¹ Electronic Database Management System (EDMS) location