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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

**DIVISION OF ENVIRONMENTAL PROTECTION**

333 W. Nye Lane, Room 138
Carson City, Nevada 89706

March 20, 2002

Mr. Jim Hancock
Facility Manager
US Ecology
PO Box 578
Beatty, Nevada 89003

Subject: Request for Clarification relating to design criteria for final design of Trench 12

Reference(s): Trench 12 Final Design and Construction, US Ecology, Beatty, NV (ltr. Petko/Wampler to Denison 2/14/2002.

Additional references: Cell 12 Design Report date 3/1996
Response to Notice of Deficiency for the Cell 12 Design Report 12/1996
Draft Responses 1/17/1997
Correspondence from NDEP of 12/7/95, 6/4/96, 9/13/96, 11/4/96
Letter from US Ecology 7/9/96

Dear Mr. Hancock:

The Division has reviewed the information relating to your request and the proposed design of Trench 12 documentation as noted above. Please find enclosed the Divisions' response.

The proposal put forth in the documents submitted by US Ecology in the previous permit renewal included an alternative design proposal pursuant to 40 CFR 264.301(d). As stated, these criteria provide for the inclusion of "...location characteristics..." In the design, US Ecology submitted a "Supplemental to MTR Equivalency Calculations, Cell 12 Design Report, Exhibit D, US Ecology, Inc, Beatty Nevada." Within this evaluation, US Ecology was to specifically evaluate the effect of 12 inches of leachate head over all areas of the cell bottom (outside of the leachate collection system) and 39 inches within the area of the leachate sumps. Both of the calculations provide equivalency with respect to the prescriptive requirements of 40 CFR §264.301(c)(1)(i)(B).

The Division concurs on the concept of equivalency and the shortcomings of a Compacted Clay Liner (CCL) in an arid environment. Accordingly, the Division concurs that US Ecology's understanding is correct in the following:

1. The "prepared subgrade" must meet the $1 \times 10^{-5}$ cm/sec criteria for the entire cell bottom
2. The "prepared subgrade" for the entire Trench 12 cell in is to be at least 9 inches thick in all areas other than the leachate collection and removal system
3. In the areas of the leachate collection and removal system the "prepared subgrade" is to be at least 36 inches thick.

However the entire design for this system, specifically the leachate collection and removal system has not been submitted to the Division for review and cannot be considered approved. US Ecology must provide an updated design inclusive of calculations for review by the Division.

Please direct inquiries to the undersigned at (775) 687-4670 or jtaylor@govmail.state.nv.us, ext. 3005.

Sincerely,

Jon Taylor
Staff Engineer, CEM
RCRA Facilities Branch
Bureau of Waste Management

JT/rc

cc: Charles A. White, Director of Regulatory Affairs, 915 L Street, Suite 1430, Sacramento, CA 95814
Mike Elges NDEP/BAQ
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