

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
PERMIT
FOR CORRECTIVE ACTION;
PURSUANT TO THE RESOURCE CONSERVATION AND RECOVERY ACT
AS AMENDED BY THE HAZARDOUS AND SOLID WASTE
AMENDMENTS OF 1984**

Permittee: U.S. Department of Energy, Naval Reactors Laboratory Field Office

Permit Number: PA0890090004

Facility Location: West Mifflin Borough, Allegheny County, Pennsylvania

The United States Environmental Protection Agency (EPA) is proposing to issue a permit renewal (EPA Permit) under the authority of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C. §§ 6901- 6992k, and regulations promulgated thereunder and set forth at 40 C.F.R. Parts 260-271, to the U.S. Department of Energy, Naval Reactors Laboratory Field Office (Permittee) for its facility located on 227 acres in West Mifflin Borough, Allegheny County, Pennsylvania (Facility).

EPA proposes that the following provisions be included in the EPA Permit for the Facility:

A. CORRECTIVE ACTION FOR CONTINUING RELEASES; PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

Section 3004(u) of RCRA, 42 U.S.C. § 6924(u), and regulations codified at 40 C.F.R. § 264.101, require corrective action for all releases of hazardous waste or constituents from any solid waste management unit (SWMU) for all permitted treatment, storage, or disposal facilities, regardless of the time the waste was placed in the unit.

Under Section 3004(v) of RCRA, 42 U.S.C. § 6924(v), and 40 C.F.R. § 264.101(c), EPA requires that corrective action at a permitted facility be taken beyond the facility boundary where necessary to protect human health and the environment unless the owner or operator of the facility concerned demonstrates to the satisfaction of EPA that, despite the owner or operator's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action.

Section 3005(c)(3) of RCRA, 42 U.S.C. § 6925(c)(3), and 40 C.F.R. § 270.32(b) provide that each permit shall contain such terms and conditions as EPA determines necessary to protect human health and the environment.

While EPA has granted the Commonwealth of Pennsylvania (the Commonwealth) authorization to operate a state hazardous waste program in lieu of

the federal program pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Commonwealth has not received authorization for the Corrective Action Program. EPA is, therefore, issuing this EPA Permit so that the Permittee can satisfy its Corrective Action requirements at the Facility.

B. REMEDY IMPLEMENTATION

On November 10, 2011, EPA issued a Final Decision and Response to Comments (FDRTC), which selected the implementation and maintenance of several remediation measures and institutional and engineering controls as the Final Remedy for the Facility. The FDRTC is set forth as Attachment A hereto and is made a part hereof. The remedial measures and institutional and engineering controls specified in the FDRTC have been implemented, however, several components of the Final Remedy have continual obligations. Commencing on the Effective Date of this EPA Permit, the Permittee shall comply with the following continual obligations:

1. Restrict and control access to, and subsurface work in, the vicinity of two inactive, underground, 40-inch Coke Gas Lines (Inactive Gas Lines) to prevent potential exposure of on-site workers to hazardous wastes and hazardous constituents and to prevent disruptions to the integrity of the Inactive Gas Lines.
2. To the extent consistent with its obligations and authorities under law, the Permittee shall pursue placement of a notice in the deed prohibiting installation of on-site drinking water wells, should the Facility property be transferred from Federal ownership.
3. Maintain cover and warning signs at the Inactive Waste Site, Bettis Landfill, and the Trash Chute Area. Maintain cover at the former Underground Waste Oil Storage Tank (UST/WOT) areas, specifically at the five following UST/WOT locations: Hangar 3, AT Building, F Shop, CY Building and J-Building. Note: The term "cover" includes but is not limited to vegetation, gravel, landscaping materials, concrete and/or asphalt.
4. Notify EPA in writing a minimum of seven days in advance of any changes to the Facility involving soil disturbances (i.e., excavation) for the Inactive Waste Site, Bettis Landfill, the five UST/WOT areas, Trash Chute area, and the Inactive Gas Lines. For emergent situations, it is acceptable to provide written notification within seven working days of any changes to the Facility involving soil disturbances for the previously specified areas. In these emergent situations, it may be necessary to provide additional recovery information beyond seven days. Note: For the purpose of this item, soil disturbances do not include soil sampling, soil boring, and/or minimal soil disturbances of twelve inches or less below the ground surface.
5. Continue to conduct periodic environmental monitoring of the following media to detect changes in concentrations of chlorinated volatile organic compounds:

- a. Material deposited in storm sewer system outfalls;
- b. On-site wells; and
- c. Surface water and sediments in Bull Run Stream.

Sampling locations, analysis parameters, and frequency are specified in Attachment C attached hereto and made a part hereof. The Permittee will annually provide to EPA results of the periodic monitoring and any proposed revisions to specific monitoring locations by the end of the following calendar year.

The components of the Final Remedy listed above are being implemented under the Facility's RCRA Storage Permit, No. PA0890090004 (DEP Permit), issued by the Pennsylvania Department of Environmental Protection (PADEP) to the Permittee. EPA has determined that protection of human health and the environment has been achieved at the Facility and will continue to be achieved at the Facility as long as the Permittee complies with the Facility's DEP Permit and the continual obligations described above.

To satisfy the Permittee's RCRA Section 3004(u) Corrective Action obligations at the Facility, this EPA Permit incorporates and provides for the implementation of all the provisions contained in the DEP Permit and all attachments thereto. The DEP Permit contains all provisions of 40 C.F.R. § 270.30 and are enforceable hereunder. The DEP Permit is hereby incorporated into this EPA Permit by reference and made a part hereof as Attachment B.

Any inaccuracies found in the information submitted by the Permittee in connection with this EPA Permit may be grounds for the termination, modification, or revocation and reissuance of this EPA Permit, and potential enforcement action (see 40 C.F.R. §§ 270.41, 270.42 and 270.43). The Permittee must inform EPA immediately of any deviation from, or changes in, the information which would affect the Permittee's ability to comply with applicable statutes, regulations, and/or permit conditions.

The Permittee shall comply with all terms and conditions set forth in this EPA Permit, including the attachments hereto. Nothing in this EPA Permit shall limit EPA's authority to undertake, or require any person to undertake, response action or corrective action under any law, including, but not limited to, Sections 104 and 106 of the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA), 42 U.S.C. §§ 9604 and 9606, and Section 7003 of RCRA, 42 U.S.C. § 6973. Nor shall any permit condition relieve the Permittee of any obligations under any law, including, but not limited to, Section 103 of CERCLA, 42 U.S.C. § 9603, to report releases of hazardous wastes, constituents, or substances to, at, or from the Facility.

C. PUBLIC COMMENT AND PARTICIPATION

Before EPA issues a Final EPA Permit for the Facility, the public may participate in

the permit decision process by reviewing the Draft EPA Permit and the documents contained in the Administrative Record (AR) supporting the permit. Section 7004(b) of RCRA and 40 C.F.R. § 124.10 require that the public be given 45 days to comment on each draft permit prepared under RCRA. Comments on the draft EPA Permit will be accepted for forty-five days, from January 14, 2026 until February 28, 2026. Any person interested in commenting on this draft permit should do so within the 45-day comment period. Any person interested in viewing a copy of the draft EPA Permit and the documents contained in the Administrative Record (AR) supporting the permit should contact Ms. Kimak at the email address below.

All comments and supporting rationale for such comments must be provided in writing, or electronically, to:

Christine Kimak
U.S. Environmental Protection Agency, Region 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103
E-mail: Kimak.Christine@epa.gov

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Kimak at the address listed above. A meeting will not be scheduled unless one is requested.

If no comments are received during the public comment period, the draft EPA Permit will become final and will become effective upon signature. If EPA receives comments on the draft EPA Permit during the public comment period, EPA will make a final permit decision after it considers information submitted during the public comment period. The final EPA Permit will become effective thirty (30) days after the service of notice of EPA's final permit decision or after the review procedures under 40 C.F.R. §124.19 are exhausted.

D. FACT SHEET FOR DRAFT PERMIT RENEWAL

EPA shall prepare a Fact Sheet for every draft permit under [§ 124.8\(a\)](#). The fact sheet shall include a brief description of the type of facility or activity which is the subject of the draft permit; the type and quantity of wastes, fluids, or pollutants which are proposed to be or are being treated, stored, disposed of, injected, emitted, or discharged; a brief summary of the basis of the draft permit conditions; reasons why any requested variances or alternatives to required standards do or do not appear justified; a description of the procedures for reaching a final decision on the draft permit; the name and telephone number by which the public may participate in the final decision; and justification for waiver of any application requirements under § 122.21(j) or (q).

E. SIGNATURE

Date: _____

David Campbell, Director
Land, Chemicals, and Redevelopment Division
U.S. Environmental Protection Agency, Region 3

Attachment A: Final Decision and Response to Comments
November 10, 2011

Attachment B: Commonwealth of Pennsylvania
Department of Environmental Protection
Permit for Hazardous and Mixed Waste Facility Storage
Bettis Atomic Power Laboratory
PA0890090004
September 13, 2017

Attachment C: Environmental Monitoring Schedule

ATTACHMENT A

FINAL DECISION AND RESPONSE TO COMMENTS

NOVEMBER 10, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

FINAL DECISION AND RESPONSE TO COMMENTS

BETTIS ATOMIC POWER LABORATORY
WEST MIFFLIN, PENNSYLVANIA
EPA ID NO. PA0890090004

I. INTRODUCTION

The United States Environmental Protection Agency (EPA) is issuing this Final Decision and Response to Comments (FDRTC) for the Bettis Atomic Power Laboratory facility located at 814 Pittsburgh-McKeesport Boulevard, West Mifflin, Pennsylvania (Facility). The purpose of the FDRTC is to describe the final remedy selected by EPA to address releases of hazardous waste and/or hazardous constituents at the Facility.

On September 8, 2010, EPA issued a supplemental Statement of Basis (SB) in which it proposed to modify the remedy described in a previous Statement of Basis, issued September 29, 1995, and finalized in a previous Final Decision and Response to Comments, issued August 15, 1997 (the 1997 FDRTC). The supplemental SB is listed as Attachment A to this FDRTC.

II. FINAL REMEDY

The following components of the final remedy remain unchanged from the 1997 FDRTC:

- Restrict and control access to, and work in, the vicinity of two inactive, underground, 40-inch Coke Gas Lines (Inactive Gas Lines) to prevent potential exposure of on-site workers to hazardous constituents and to prevent disruptions to the integrity of the lines
- Follow health and safety procedures contained in 29 CFR Section 1910.120 during any work around the Inactive Gas Lines, the Inactive Waste Site (IWS), the former Underground Waste Oil Storage Tank (UST/WOT) areas and the Trash Chute area
- Follow health and safety procedures contained in 29 CFR Section 1910.120 when handling groundwater during any excavations at the Facility
- Place restrictions on the deed to Facility property to prevent the installation of on-site drinking water wells
- Maintain vegetative cover and warning signs at the Inactive Waste Site; maintain existing covers at the UST/WOT areas and maintain existing cover and warning signs at the Trash Chute Area
- Notify EPA of all designs and/or plans for changes to the Facility involving soil disturbances (i.e. excavation) for the Inactive Waste Site, the UST/WOT areas, the Trash Chute area and the Inactive Gas Lines
- Conduct periodic environmental monitoring of the following media to detect changes in concentration of specific contaminants:

- Material deposited in the two storm sewer system outfalls
 - On-site wells
 - Surface water and sediments in the Bull Run stream
- Conduct periodic inspections of access points in the Inactive Gas Lines to detect changes in volume of deposited materials
- Remediate Volatile Organic Compounds (VOCs) in soils at the Bettis Landfill using an in-situ soil vapor extraction (SVE) system

This FDRTC revises the remedy for groundwater which has been impacted by the IWS by both adding and deleting a remedy component of the 1997 FDRTC. The following component of the final remedy has been added today as proposed in the supplemental SB:

- The Facility shall monitor the use of Valley National Gases property, which is downgradient of the Inactive Waste Site, on an annual basis to confirm the absence or presence of water supply wells and/or plans for installation of such wells. If use (or plans for such use) of groundwater is confirmed, this use will be reported by the Facility to the EPA. This requirement shall continue for 20 years or until EPA determines that it is no longer necessary.

The following components of the final remedy set forth in the 1997 FDRTC are being deleted as of today as proposed in the supplemental SB:

- Construct a system that uses subsurface drainage at the northern portion of the Facility to collect groundwater before it discharges to the surface through seeps and natural springs. Collected groundwater will be treated using Granular Activated Carbon or Air Strippers with air emission controls. Treated water will be disposed of through National Pollution Discharge Elimination System (NPDES) permitted outfalls. Residues from treatment units will be disposed off-site in accordance with applicable regulations.
- Conduct periodic monitoring of water and sediments in runoff from the Facility to the Valley National Gases property

The additional remedy component (monitoring of groundwater use on an off-site property), combined with Allegheny County Health Department Regulations that preclude the use of groundwater as a drinking water supply and West Mifflin zoning ordinances that preclude residential construction in the affected area, will provide assurance that groundwater use on the Valley National Gases property does not occur without notification to EPA. With the implementation of this corrective measure, the construction of a subsurface drainage collection system should no longer be necessary. The remaining portions of the remedy as described in the 1997 FDRTC have been completed.

The final remedy as described in the supplemental SB and this FDRTC is enforceable through the Final Administrative Order on Consent, which became effective April 11, 2001.

III. PUBLIC COMMENT PERIOD

On September 8, 2010, EPA issued the supplemental SB. Consistent with public participation provisions under the Resource Conservation and Recovery Act (RCRA), EPA requested comments from the public on the proposed remedy as described in the SB. The commencement of a thirty (30)-day public comment period was announced in the *Tribune-Review* on September 8, 2010 and on the EPA Region III website. The public comment period ended on October 8, 2010.

IV. RESPONSE TO COMMENTS

EPA received no comments on the proposal. Consequently, the Final Remedy is unchanged from the proposal.

V. AUTHORITY

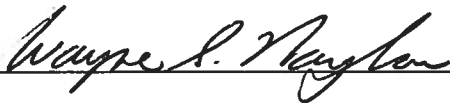
EPA is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

VI. DECLARATION

Based on the Administrative Record compiled for the Corrective Action at the Bettis Atomic Power Laboratory facility, EPA has determined that the Final Remedy selected in this Final Decision and Response to Comments is protective of human health and the environment.

LIST OF ATTACHMENTS

A. September 8, 2010, Statement of Basis.



 Abraham Ferdas, Director
Land & Chemicals Division
U.S EPA Region III



Date

ATTACHMENT B
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PERMIT FOR HAZARDOUS AND MIXED WASTE STORAGE
BETTIS ATOMIC POWER LABORATORY
PA0890090004
SEPTEMBER 13, 2017

Intentionally Left Blank

February 8, 2019

CERTIFIED MAIL NO. 7018 1130 0001 4475 4611

David W. Harper
Project Officer
Naval Reactors Laboratory Field Office
P.O. Box 109
West Mifflin, PA 15122

Re: Bettis Atomic Power Laboratory
West Mifflin Borough
Allegheny County
I.D. No. PA0890090004
APS No. 271519
Authorization No. 1250573

Dear Mr. Harper:

Enclosed is a Class 1 permit modification of Solid Waste Permit No. PA0890090004 for the operation of the Bettis Atomic Power Laboratory, issued in accordance with Article V of the Solid Waste Management Act, 35 P.S. Sections 6018.101, et seq. This Class 1 permit modification approves the new site operator, Fluor Marine Propulsion, LLC. Enclosed are affected pages (page 2) of the permit.

This authorization does not relieve the applicant from applying for and obtaining any additional permits or approvals from local, state or federal agencies required for this project. Please be advised that if any other permits are required for this project, they must be issued prior to undertaking the activities described in the permit application. Issuance of the enclosed permit(s) does not indicate an affirmative action on any other pending or future permit applications. If you are uncertain as to whether or not other permits are needed for this project, please use the Department's "Permit Application Consultation Tool" (PACT) which can be found at <http://www.ahs.dep.pa.gov/PACT/>. The online tool is designed to quickly and easily assist potential applicants in determining which types of environmental permits, authorizations or notifications would be needed for specific projects. Based on the user's responses to a series of simple questions, PACT automatically provides an email response with information on permits and other information an applicant should consider.

Compliance with the terms and conditions set forth in the permit is mandatory. You have the right to file an appeal as to the modified terms and conditions.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board) pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457

Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

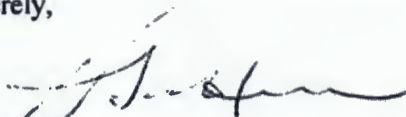
A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://ehb.courtapps.com> or by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions about the enclosed permit or requirements of the Solid Waste Management Act, please contact Oscar Vazquez at 412.442.4157 or by email at ovazquez-m@pa.gov.

Sincerely,



H. Scott Swarm
Environmental Program Manager
Bureau of Waste Management

Enclosures: Revised Page 2 of the Permit

cc: Allegheny County Health Department (w/ enclosures)
CERTIFIED MAIL NO. 7018 1130 0001 4475 4628
West Mifflin Borough (w/ enclosures)
CERTIFIED MAIL NO. 7018 1130 0001 4475 4635
Sara Kinslow - EPA Region III (w/ enclosures)
CERTIFIED MAIL NO. 7018 1130 0001 4475 4642
Regional (w/ enclosures)
Chron (w/ enclosures)
Central - Hazardous Waste Division (w/ enclosures)
Permit Binder File (w/enclosures)
O. Vazquez (w/ enclosures)
M. Cwiklik (w/enclosures)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Permit
For
HAZARDOUS WASTE TREATMENT, STORAGE, AND/OR DISPOSAL FACILITY

Permit No. PA0890090004
Date Issued September 13, 2017
Date Expired September 13, 2027

Under the provisions of the Pennsylvania Solid Waste Management Act of July 7, 1980, Act 97, a permit for hazardous waste treatment, storage, and/or disposal facility in (municipality) WEST MIFFLIN BOROUGH in the County of ALLEGHENY is granted to:

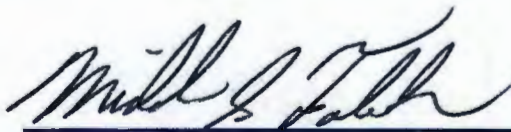
Department of Energy
Naval Reactors Laboratory Field Office
814 Pittsburgh-McKeesport Blvd.
West Mifflin, PA 15122

This permit is applicable to the facility named as BETTIS ATOMIC POWER
LABORATORY and described as:

HAZARDOUS AND MIXED WASTE CONTAINER STORAGE FACILITY.

This permit is subject to modification, amendment and supplement by the Department of Environmental Protection and is further subject to revocation or suspension by the Department of Environmental Protection for any violation of the applicable laws or the rules and regulations adopted thereunder, for failure to comply in whole or in part with the conditions of this permit and the provisions set forth in application no. PA0890090004 which is made a part hereof, or for causing any condition inimical to the public health, safety or welfare.

See attachment for waste limitations and/or
special conditions


FOR THE DEPARTMENT OF
ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

PERMIT FOR HAZARDOUS AND MIXED WASTE FACILITY STORAGE

Permittee: U.S. Department of Energy
Naval Reactors Laboratory Field Office

Permit Number: PA0890090004

Facility: Bettis Atomic Power Laboratory

This permit is issued by the Commonwealth of Pennsylvania, Department of Environmental Protection (DEP), under authority of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. Section 6018.101, et seq. (the Act) and DEP hazardous waste regulations to the U. S. Department of Energy, Naval Reactors Laboratory Field Office, Bettis Atomic Power Laboratory (hereafter called the Permittee), to operate a hazardous waste management facility located in West Mifflin Borough, Allegheny County, Pennsylvania, at latitude 40°21'37" North and longitude 79°53'55" West.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (Parts I - III consisting of pages 1 through 16 and Attachments 1 through 6) and the applicable regulations contained in 25 Pa. Code Chapters 260a-270a as specified in the permit.

This permit is based on the assumption that the information submitted in the Permittee's application for permit renewal dated August 5, 2015 as amended on February 1, 2017, and the Class 1 minor modification applications dated May 30, 2017, as amended September 2017, and October 26, 2018, as amended on November 19, 2018 (hereafter referred to as the Application) is accurate and that the facility will be constructed and/or operated as specified in the Application.

Any inaccuracies found in this information may be grounds for the revocation or modification of this permit and potential enforcement action. The Permittee must inform DEP 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 is conditioned upon full compliance with all applicable provisions of the Act; DEP regulations contained in 25 Pa. Code Chapters 260a-270a; the Clean Streams Law, 35 P.S. § 691.1, et seq.; the Air Pollution Control Act, 35 P.S. § 4001, et seq.; the Dam Safety and Encroachments Act, 32 P.S. § 693.1, et seq.; the Surface Mining Conservation and Reclamation Act, 52 P.S. § 1396.1, et seq.; the Coal Refuse Disposal Control Act, 52 P.S. § 30.51, et seq.; all other Pennsylvania statutes related to the protection of the environment; and all Pennsylvania statutes related to the protection of public health, safety, and welfare. This permit is further conditioned upon full compliance with the EPA Corrective Action Permit issued pursuant to Section 3004(u) of the Resource Conservation and Recovery Act.

This permit is effective as of February 8, 2019, and shall remain in effect until September 13, 2027, unless modified, terminated or revoked in accordance with 25 Pa. Code §§ 270a.41, 270a.42 and 270a.43, or continued.

PART I – STANDARD CONDITIONS

A. EFFECT OF PERMIT

This permit authorizes only the management of hazardous waste and mixed (hazardous and radioactive) waste expressly described in this permit and does not authorize any other management of hazardous or mixed waste. 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 laws or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under the Act or any other law governing protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, terminated or revoked for cause as specified in 25 Pa. Code §§ 270a.41, 270a.42, and 270a.43 or suspended in accordance with the Act. The filing of a request for a permit modification, termination, or revocation or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay or supersede the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions 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 to be invalid, the application of such provision to other circumstances and the remaining provisions of this permit shall not be affected thereby.

D. DEFINITIONS

For the purpose of this permit, terms used herein shall have the same meaning as those in Title 25 of the Pennsylvania Code (25 Pa. Code Chapters 260a-270a), unless this permit specifically states otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. "The Department" is the Department of Environmental Protection of the Commonwealth of Pennsylvania.

E. REPORTS, NOTIFICATIONS AND SUBMISSIONS TO THE DEPARTMENT

All reports, notifications or other submissions which are required by this permit to be sent or given to the Department should be sent certified mail or given to:

Environmental Program Manager, Bureau of Waste Management
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

F. SIGNATORY REQUIREMENTS

All reports or other information requested by the Department shall be signed and certified as required by 40 CFR § 270.11 (incorporated by reference at 25 Pa. Code Chapter 270a).

PART I – STANDARD CONDITIONS

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents as required by 40 CFR Part 264 (incorporated by reference at 25 Pa. Code Chapter 264a) and this permit:

1. Waste analysis plan.
2. Personnel training documents and records.
3. Contingency plan.
4. Closure plan.
5. Annually-adjusted cost estimate for facility closure.
6. Operating record.
7. Inspection schedules and logs.
8. Documents required by Part I, Sections H.9, 13, 15, and Part II, Sections D, E, G, H, and K of this permit.

H. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and the regulations promulgated thereunder and is grounds for enforcement action; for permit revocation, revocation and reissuance, or modification; or for denial of a permit renewal application.
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 submit a complete application for a new permit at least 180 days before this permit expires.
3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application and through no fault of the Permittee, the Department has not issued a new permit.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action to argue that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. In the event of noncompliance with the Act, the regulations, or this permit, the Permittee shall take all necessary steps to prevent and abate any releases to the environment, and shall carry out such measures as are necessary to prevent significant adverse impacts on human health or the environment.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of storage, treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the Act, the regulations, and the conditions of this permit. Proper operation and maintenance shall include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.

PART I – STANDARD CONDITIONS

7. The Permittee shall operate back-up or auxiliary facilities or similar systems if necessary to achieve compliance with the Act, the regulations and the conditions of the permit.
8. Duty to Provide Information. The Permittee shall furnish to the Department within a reasonable time, any relevant information which the Department may request to determine whether cause exists for modifying, terminating or revoking this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by the Permittee pursuant to the Act, the regulations, or any permit condition.
9. Inspection and Entry. The Permittee shall allow the Department, its agents and authorized representatives, upon the presentation of credentials and other documents as may be required by law, or without advance notice or a search warrant to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records concerning the regulated facility or activity are kept;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the Act, the regulations, or this permit;
 - d. Sample or monitor any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by the Act or the regulations;
 - e. Respond to emergencies at the permitted waste storage facility (D-Building) without the need to obtain DOE access authorization under the Atomic Energy Act; and
 - f. Engage in any other activities necessary or appropriate to the documentation of events or conditions at any locations.
10. Monitoring and Records.
 - 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 Appendix I of 40 CFR Part 261 or an equivalent method approved by the Department. Laboratory methods must be those specified in Appendix III of 40 CFR Part 261; Test Methods for Evaluating Solid Waste: Physical/Chemical Methods (U.S. EPA Document SW-846, most recent edition); Standard Methods for Examination of Water and Wastewater; Methods for Chemical Analysis of Water and Wastes (U.S. EPA - 600/4 - 79-020); or an equivalent method approved by the Department and as specified in the attached waste analysis plan (40 CFR Part 261 incorporated by reference at 25 Pa. Code Chapter 261a).

PART I – STANDARD CONDITIONS

- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by the Act, the regulations, or this permit, and all records of all data used to complete the Application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record, or application. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- c. The Permittee shall, at a minimum, keep monitoring records which include the following information:
 - (1) The dates, exact place, and times of sampling or measurements;
 - (2) The individuals who performed the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The individuals who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses, sampling or measurements.
- 11. Reporting Planned Changes. The Permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility. This notice must include a description of all incidents of noncompliance reasonably expected to result from the proposed changes. The Permittee shall not modify the facility without first obtaining a permit from the Department.
- 12. Anticipated Noncompliance. The Permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- 13. Transfer of Permits. This permit shall not be transferred or assigned to any other person or municipality.
- 14. Twenty-Four Hour Reporting. The Permittee shall report to the Department any noncompliance with the Act, the regulations or any condition of this permit or any occurrence or event at the facility which may endanger health or the environment.
 - a. Information shall be provided orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
 - (1) Information concerning release or potential release of any hazardous waste from the facility that may endanger public drinking water supply sources.
 - (2) Any information of a release, potential release, or discharge of hazardous waste from the facility, or information of a potential or actual fire or explosion at the facility, which may threaten the environment or human health.

PART I – STANDARD CONDITIONS

- b. The description of the occurrence and its cause shall include:
- (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazards to the environment and human health at or near the facility; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided to the Department within five (5) days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of non-compliance (including exact dates and times); if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The Permittee need not comply with the five (5) day written notice requirement if the Department extends it to fifteen (15) days.
15. Other Noncompliance. The Permittee shall report to the Department all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition I.H.13.
16. Other Information. Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Department, or whenever the Permittee becomes aware of circumstances which require a modification or clarification of any fact or representation made to the Department in connection with a permit application, it shall promptly submit such facts or information to the Department.

PART II - GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater which could threaten human health or the environment.

B. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the attached Waste Analysis Plan - Attachment 1. The Permittee shall verify its waste analysis as part of its quality assurance program, in accordance with current EPA practices (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, most recent edition) or equivalent methods approved by the Department in accordance with procedures in 40 CFR §260.21 (incorporated by reference at 25 Pa. Code Chapter 260a); and at a minimum maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. The Permittee shall recharacterize its waste at least annually unless it is certified that the waste generation process has not changed. Module 1 applications for treated mixed waste from other Naval Nuclear Propulsion Program facilities shall be submitted to the Department at least 10 days prior to acceptance of such waste for storage by the Permittee.

C. SECURITY

The Permittee shall comply with the security provisions of 40 CFR § 264.14 (incorporated by reference at 25 Pa. Code Chapter 264a).

D. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection plan set out in the Inspection Schedule - Attachment 2. The Permittee shall remedy any deterioration or malfunction discovered by an inspection and maintain records of inspections as required by 40 CFR § 264.15 (incorporated by reference at 25 Pa. Code Chapter 264a).

E. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by 40 CFR § 264.16 (incorporated by reference at 25 Pa. Code Chapter 264a). This training program shall follow the attached outline as described in Attachment 3. The Permittee shall maintain training documents and records.

F. PREPAREDNESS AND PREVENTION

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the PPC Plan - Attachment 4.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition and in Attachment 4, as necessary to assure its proper operation in time of emergency.

PART II - GENERAL FACILITY CONDITIONS

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR § 264.34 (incorporated by reference at 25 Pa. Code Chapter 264a).
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR § 264.35 (incorporated by reference at 25 Pa. Code Chapter 264a) and as shown on the Plans and Specifications - Attachment 5.
5. Arrangements with Local Authorities. The Permittee shall maintain arrangements with State and local authorities as required by 40 CFR § 264.37 (incorporated by reference at 25 Pa. Code Chapter 264a). If State or local officials refuse to enter into or renew existing preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

G. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

1. Implementation of PPC Plan. The Permittee shall immediately carry out the provisions of the PPC Plan - Attachment 4, whenever there is a fire, explosion, emission or discharge of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Off-site response personnel shall be allowed access to the permitted waste storage facility (D-Building) without the need to obtain DOE access authorization under the Atomic Energy Act.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR § 264.53 (incorporated by reference at 25 Pa. Code Chapter 264a).
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the PPC Plan, as required by 40 CFR § 264.54 (incorporated by reference at 25 Pa. Code Chapter 264a).
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR § 264.55 (incorporated by reference at 25 Pa. Code Chapter 264a).
5. Emergency Procedures. The Permittee shall comply with the requirements of 40 CFR § 264.56 (incorporated by reference at 25 Pa. Code Chapter 264a) and 25 Pa. Code § 264a.56.

H. RECORDKEEPING AND REPORTING

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR § 264.73 (incorporated by reference at 25 Pa. Code Chapter 264a).
2. Biennial Report. The Permittee shall comply with all applicable biennial report requirements of 40 CFR § 264.75 (incorporated by reference at 25 Pa. Code Chapter 264a).
3. Required Reports. The Permittee shall comply with all applicable reporting requirements as described in Part I, Sections E, F, H and Part II, Sections G, H, and I of this permit.

PART II - GENERAL FACILITY CONDITIONS

I. CLOSURE

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR § 264.111 (incorporated by reference at 25 Pa. Code Chapter 264a) and in accordance with the Closure Plan - Attachment 6.
2. Amendment to Closure Plan. The Permittee shall amend the Closure Plan in accordance with 40 CFR § 264.112(c) (incorporated by reference at 25 Pa. Code Chapter 264a) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Department in writing at least 45 days prior to the date he expects to begin final closure of the facility.
4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste and shall complete closure activities in accordance with the schedules specified in the Closure Plan - Attachment 6.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the Closure Plan - Attachment 6.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan as required by 40 CFR § 264.115 (incorporated by reference at 25 Pa. Code Chapter 264a) and 25 Pa. Code § 264a.115.

J. M-BUILDING CLOSURE

The Permittee shall implement closure of the M-Building in accordance with the Closure Plan and M-Building Transition Plan as described in Attachment 6 and subject to the following conditions:

1. The Permittee shall notify the Department in writing at least 45 days prior to the date of expected closure initiation in accordance with 40 CFR § 264.112(d) (incorporated by reference at 25 Pa. Code Chapter 264a).
2. The permittee shall notify the Department in writing of the date which the final volume of hazardous waste was received in the M-Building. This date marks the initiation of the M-Building closure process required under this section.
3. Within 90 days after receiving the final volume of hazardous wastes in the M-Building, the Permittee shall remove from the M-Building, all hazardous wastes in accordance with the approved closure plan in accordance with 40 CFR § 264.113(a) (incorporated by reference at 25 Pa. Code Chapter 264a). Hazardous wastes must be shipped off-site to a permitted facility or transferred to the D-Building.
4. The Permittee must complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of hazardous wastes in the M-Building in accordance with 40 CFR § 264.113(b) (incorporated by reference at 25 Pa. Code Chapter 264a).

PART II - GENERAL FACILITY CONDITIONS

5. Within 60 days of completion of closure of the M-Building, the Permittee must submit to the Department, by registered mail, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification must be signed by the owner or operator and by a qualified Professional Engineer.

K. COST ESTIMATE FOR FACILITY CLOSURE

1. Annual Adjustment. The Permittee shall adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first cost estimate was provided to the Department.
2. Adjustment for Changed Conditions. The Permittee shall revise the cost estimate whenever there is a change in the facility's closure plan or in the measures necessary to prevent adverse effects upon the environment.
3. Availability. The Permittee must keep the latest cost estimate at the facility.

L. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of 40 CFR § 264.17 (incorporated by reference at 25 Pa. Code Chapter 264a).

M. CONTRACTORS

1. Independent contractors and agents who are to operate under this permit shall be subject to the applicable provisions of the Solid Waste Management Act and Clean Streams Law. Such independent contractors, agents and the permittee shall be jointly and severably liable without regard to fault for violations of the Solid Waste Management Act and the Clean Streams Law which occurred during the course of facility operations.
2. Any independent contractors or agents retained by the Permittee to construct or operate this site shall be subject to prior compliance history review by the Department as specified in Section 503 of the Solid Waste Management Act.

N. LAND DISPOSAL RESTRICTIONS

The Permittee shall comply with standards under 40 CFR Part 268 (incorporated by reference at 25 Pa. Code Chapter 268a, except where stated at 25 Pa. Code § 268a.1) applicable to hazardous waste storage facilities.

PART III - STORAGE IN CONTAINERS

A. WASTE IDENTIFICATION

The Permittee may store the hazardous and mixed wastes identified in the Waste Analysis Plan - Attachment 1 to this permit, in containers at the facility subject to the terms of this permit.

B. DURATION OF STORAGE

The Permittee shall notify the Department in writing of its intent to store containers of hazardous waste at this facility in excess of one year. The Permittee shall submit the notice on or before the date on which the waste will have been stored for one year. The notice shall describe the containers by identification number, waste type and efforts made to arrange for off site transportation of the waste. The Permittee shall continue to notify the Department in writing of the status of the containers being stored in excess of one year every six months after the initial notification. The Permittee shall notify the Department after the waste has been transported off site.

If the Permittee intends to store mixed wastes in excess of one calendar year from either the date of on-site generation or the date that residues from the off-site treatment mixed wastes are received, a written notification shall be submitted to the Department prior to exceeding the one-year storage limitation for any wastes stored in the permitted waste storage facility (D-Building). The notification shall include the following information:

1. The names and quantity of each type of waste that will exceed the one-year storage limitation;
2. Identification of off-site treatment facilities that are being evaluated that could treat the mixed wastes being stored greater than one calendar year;
3. A schedule of milestones for obtaining off-site treatment capabilities; including, but not limited to:
 - a. Confirmation that the off-site treatment facility can and will treat the targeted mixed wastes,
 - b. Obtaining a contract with the off-site treatment facility, and
 - c. Projected shipment date of targeted mixed wastes to the off-site treatment facility.

The Permittee shall continue to notify the Department in writing of the status of the containers being stored in excess of one year every six months after the initial notification. The Permittee shall notify the Department in writing after the waste has been transported off site.

C. CONDITION OF CONTAINERS

If a container holding hazardous or mixed waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

PART III - STORAGE IN CONTAINERS

D. PLACEMENT REQUIREMENTS

1. Prior to initiating closure of the *M-Building*, the Permittee may continue to store hazardous waste containers in the M-Building in accordance with the following content and location requirements in the M-Building:

- a. Area I

- 1) Maximum Storage Allowed: 935 gallons in containers.
(e.g. 17- Fifty-five gallon drums or equivalent)
- 2) Total volume for containers in Storage Cabinet 6: 45 gallons.
- 3) Total volume for containers in Storage Cabinet 7: 45 gallons.

- b. Area II

Maximum Storage Allowed: 1,320 gallons in containers.
(e.g. 24- Fifty-five gallon drums or equivalent)

- c. Area III

Maximum Storage Allowed: 110 gallons in containers in each Storage Cabinets 1, 2 and 3; and, a total additional volume of 15 gallons for all smaller containers in each storage cabinet.

The total volume of waste stored in each cabinet shall not exceed 125 gallons.

- d. Area IV

- 1) Maximum Storage Allowed: 1,650 gallons in containers.
(e.g. 30- Fifty-five gallon drums or equivalent)
- 2) Total volume for containers in Storage Cabinet 4: 45 gallons.

- e. Area V

- 1) Maximum Storage Allowed: 715 gallons in containers.
(13- Fifty-five gallon drums or equivalent)
- 2) Total volume for containers in Storage Cabinet 5: 45 gallons.

- f. On the date stated in the notification of intent to close the M-Building referenced in Part II, Section J.2 of this permit, the Permittee shall cease acceptance of hazardous wastes into the M-Building. Following completion of closure activities described in Part II, Section J of this permit, the M-Building will no longer be considered a permitted unit under the terms and conditions of this permit. The permittee may store hazardous waste in the M-Building in accordance with the requirements of 40 CFR 262 (incorporated by reference at 25 Pa. Code 262a.).

PART III - STORAGE IN CONTAINERS

2. The Permittee may store hazardous and mixed waste containers (including treated mixed waste from other DOE Naval Nuclear Propulsion Program facilities) in the *D-Building* in accordance with the following specifications:

a. Storage and Loading Area:

- 1) Maximum Storage Allowed: 7,810 gallons in containers.
(e.g. 142- Fifty-five gallon drums or equivalent).
- 2) Total volume for the four (4) small waste storage cabinets: 195 gallons.
- 3) Total volume for the three (3) drum flammable storage cabinets: 360 gallons of flammable and combustible liquids.

b. Waste Storage Area:

- 1) Maximum Storage Allowed: 29,480 gallons in containers
(e.g. 536 - Fifty-five gallon drums or equivalent).

No more than 21,800 gallons of hazardous waste containing PCBs shall be stored unless additional spill containment is provided.

- 2) Total volume for two small container flammable storage cabinets: 150 gallons of flammable and combustible liquids.
- 3) Total volume for the drum flammable storage cabinet: 120 gallons of combustible and flammable liquids.
- 4) Total volume for the small container waste storage cabinet: 60 gallons.

E. COMPATIBILITY OF WASTES WITH CONTAINERS

The Permittee shall ensure that the ability of the container to contain the waste is not impaired as required by 40 CFR § 264.172 (incorporated by reference at 25 Pa. Code Chapter 264a).

F. MANAGEMENT OF CONTAINERS

The Permittee shall manage containers as required by 40 CFR § 264.173 (incorporated by reference at 25 Pa. Code Chapter 264a).

G. CONTAINMENT

The Permittee shall construct and/or maintain the containment system as required by 40 CFR § 264.175 (incorporated by reference at 25 Pa. Code Chapter 264a) and the attached Plans and Specifications - Attachment 5.

H. CONTAINER STACKING HEIGHT, WIDTH, AND DEPTH

The Permittee shall store containers of hazardous waste as required by 25 Pa. Code § 264a.173 and the attached Plans and Specifications - Attachment 5. Containers may be stacked no higher than 9 feet in the D-Building.

PART III - STORAGE IN CONTAINERS

I. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The Permittee shall not locate containers holding ignitable or reactive wastes within 15 meters (50 feet) of the facility's property line. Ignitable and reactive (cyanide) wastes may only be stored as indicated in Attachment 5.
2. The Permittee shall document compliance with Section 1. of this condition as required by 40 CFR § 264.17(c) (incorporated by reference at 25 Pa. Code Chapter 264a) and place this documentation in the operating record (Permit Condition II.H.1).

J. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. Placement of Incompatible Wastes. The placement of incompatible wastes and/or materials in the same container is prohibited. Acids and bases must be placed on separate containment units. Containers with Waste Code D002 labels should be identified as an acid or base (alkaline).
2. Incompatible Wastes in Unwashed Containers. The Permittee shall not place hazardous or mixed waste in an unwashed container that previously held an incompatible waste or material.
3. Storage of Incompatible Wastes. The Permittee shall store containers of incompatible wastes as indicated in the attached plans, Attachment 5, as required by 40 CFR § 264.177 (incorporated by reference at 25 Pa. Code Chapter 264a).
4. Documentation. The Permittee must document compliance with Sections 1. and 2. of this condition as required by 40 CFR § 264.17(c) (incorporated by reference at 25 Pa. Code Chapter 264a) and place this documentation in the operating record (Permit Condition II.H.1.).

K. AIR EMISSION STANDARD

The Permittee shall comply with the applicable provisions of 40 CFR §§ 264.1086(c)(1) through (c)(5) (incorporated by reference at 25 Pa. Code Chapter 264a), relating to controlling volatile organic air emissions from containers, for hazardous waste stored in containers.

L. ON-SITE TREATMENT

Treatment of on-site generated waste to change one or more characteristic of hazardous waste (defined at 40 CFR Part 261, Subpart C which is incorporated by reference at 25 Pa. Code Chapter 261a) is covered by the permit by rule provisions of 25 Pa. Code §§ 270a.60(a) and (b)(2) provided the Permittee complies with those provisions and notifies the Department of any new types of treatment and mixed wastes to be treated.

M. INSPECTIONS

The Permittee shall inspect each storage area subject to this permit as required by 40 CFR § 264.174 (incorporated by reference at 25 Pa. Code Chapter 264a) and Attachment 2.

LIST OF ATTACHMENTS

- | | |
|---------------------|--|
| Attachment 1 | Waste Analysis Plan |
| Attachment 2 | Inspection Schedule
<i>(Revised 12/14/17)</i> |
| Attachment 3 | Personnel Training Outline |
| Attachment 4 | Contingency Plan
<i>(Revised 12/14/17)</i> |
| Attachment 5 | Plans and Specifications of
Container Storage Areas |
| Attachment 6 | Closure Plan |

ATTACHMENT C
ENVIRONMENTAL MONITORING SCHEDULE

Attachment C

Environmental Monitoring Schedule

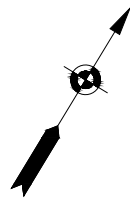
Media	Location (see map)	Analysis Parameters ¹	Frequency
Sediment	NPDES Outfall 001 stilling basin ²	VOCs	Annually
	Bull Run Stream location BR1	VOCs	Annually
	Bull Run Stream location BR5	VOCs	Annually
Groundwater	Sewickley Sandstone Zone: Well 51 and 65.	VOCs	Annually
	Pittsburgh Sandstone Zone: Well 60 and 75.	VOCs	Annually
	Pittsburgh Coal Zone: Well 44a.	VOCs	Annually
Surface Water	Bull Run Stream location BR1	VOCs	Annually
	Bull Run Stream location BR5	VOCs	Annually

¹ Samples will be analyzed by a National Environmental Laboratory Accreditation Conference certified laboratory (or equivalent) for analyses for volatile organic compounds using EPA Method 8260D (or subsequent revision). VOCs are chlorinated volatile organic compounds.

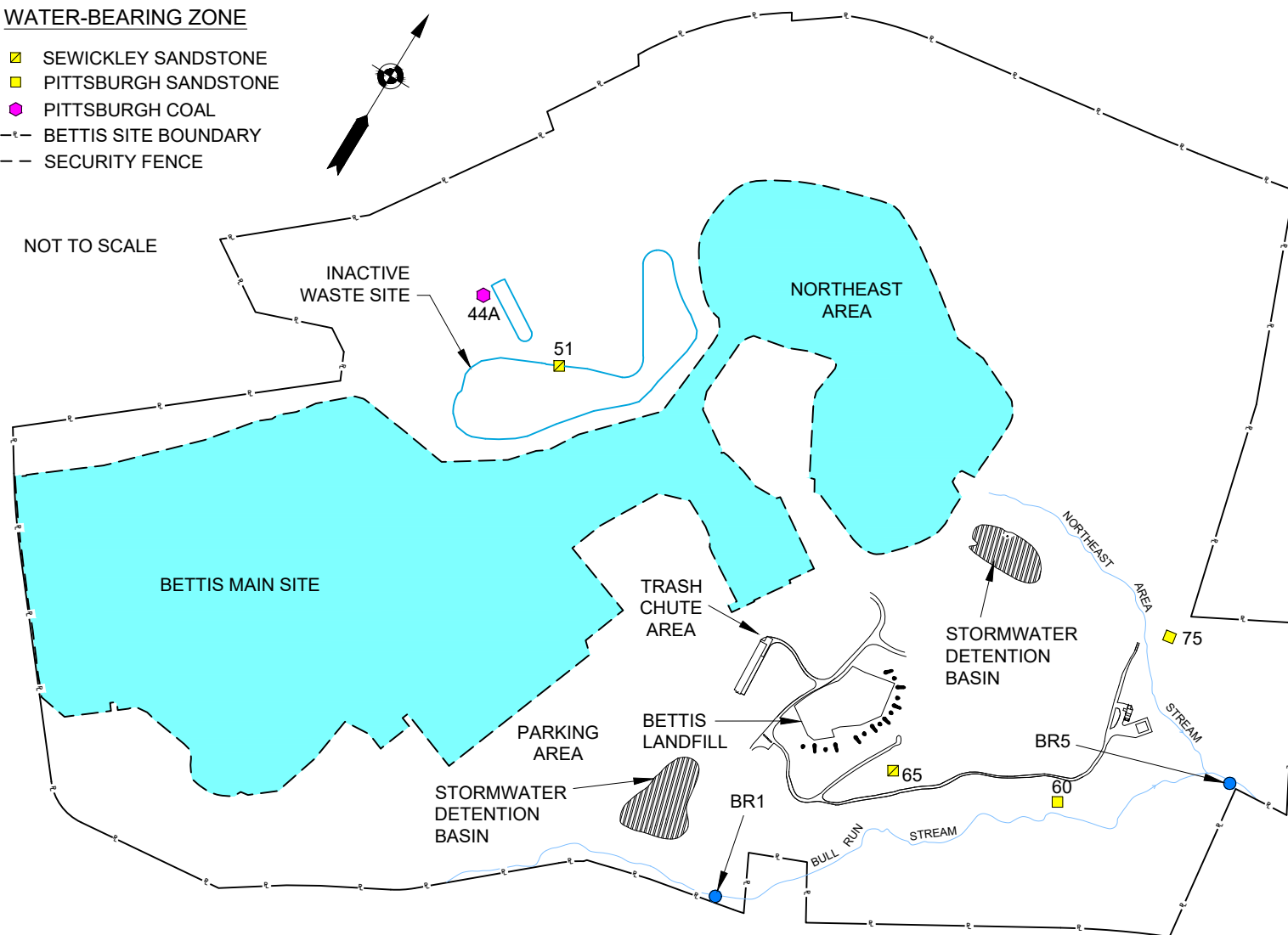
² NPDES Outfall 001 stilling basin is scheduled to be eliminated and NPDES Outfall 001 will be relocated in 2025. No sampling will occur at the stilling basin location or the new Outfall after elimination.

WATER-BEARING ZONE

- SEWICKLEY SANDSTONE
- PITTSBURGH SANDSTONE
- PITTSBURGH COAL
- BETTIS SITE BOUNDARY
- SECURITY FENCE



NOT TO SCALE



ENVIRONMENTAL MONITORING SCHEDULE SAMPLING LOCATIONS