



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/524-3301

Certified Mail
Return Receipt Requested

OWNER

U.S. Department of the Interior
Fish and Wildlife Service
Attn: Justin Sexton
Refuge Manager
Crab Orchard National Wildlife Refuge
8588 Route 148
Marion, Illinois 62959

OPERATOR

General Dynamics - OTS
Marion Operations
Attn: Diane Summerlin
Manager of Envir. Health and Safety
6658 Route 148
Marion, Illinois 62959

Re: 1998620013 – Williamson County
General Dynamics OTS Area 13
IL8143609487
Log No. B-104R2
RCRA Administrative Record File
Permit Draft

Dear Mr. Sexton and Ms. Summerlin:

Enclosed is a draft renewed Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management permit and fact sheet. The draft permit is based on the administrative record contained in the Illinois Environmental Protection Agency (Illinois EPA)'s files. The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 705.144.

Under the provisions of 35 IAC 705.141(d), the draft permit and administrative record must be publicly noticed and made available for public comment. The Illinois EPA must also provide an opportunity for a public hearing. Copies of the draft decision and fact sheet are available for review at the Marion City Hall, 1102 Tower Square Plaza Marion, Illinois 62959. The Illinois EPA has not scheduled a public hearing at the current time. However, any interested party may request a public hearing. The public comment period will close on February 5, 2024.

During the comment period, the applicant or any interested party may submit comments to the Illinois EPA on the draft renewed permit. At the close of the comment period, the Illinois EPA will prepare a response to significant comments. Comments on the draft permit renewal may be submitted to:

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

Brad Frost, Office of Community Relations (#5)
Illinois Environmental Protection Agency
1021 N. Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

The Illinois EPA will issue a final permit after the close of the public comment period unless the Illinois EPA decides to reverse the tentative decision. The appeal process and limitations are addressed in 35 IAC 705.212.

Any questions related to corrective action issues of this draft permit should be directed to Visal Thalawe Arachchilage at 217/558-4717. All other questions regarding this permit should be referred to Rongjuan Yang at 217/557-8912.

Sincerely,



Jacqueline M. Cooperider, P.E.
Permit Section Manager
Bureau of Land

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TWA TWT

Attachments: Fact Sheet
Draft Renewed RCRA Permit

cc: USEPA Region V - Emily Keener
General Dynamics-OTS - Diane Summerlin
Trinity Consultants - Douglas Abeln R.G.

**FACT SHEET
RCRA HAZARDOUS WASTE PERMIT**

**FEDERAL ILD NO. IL8143609487
STATE ID NO. 1998620013**

This fact sheet has been prepared pursuant to the requirements of Title 35 Illinois Administrative Code (35 IAC) 705.143. The fact sheet is intended to be a brief summary of the principal facts and significant factual, legal, methodological, and policy questions considered in preparing a draft renewed RCRA permit for the U.S. Department of Interior (DOI) Fish and Wildlife Service's (USFWS) Crab Orchard National Wildlife Refuge (CONWR) as owner and General Dynamics Ordnance and Tactical Systems Division (GD-OTS) Marion Operations as operator to manage hazardous waste in Ordill Area 13 (hereafter referred to as Area 13) located at 6000 West Ogden Road in Marion, Illinois. GD-OTS Marion Operations was formerly known as Primex Technologies, Inc. (Primex). Pursuant to 35 IAC 705.143(a), this fact sheet is sent to the applicant and to any other person who requests it.

If issued, this renewed permit will allow GD-OTS to continue storing hazardous waste in eight (8) container areas (a.k.a. magazines) located in Area 13 facility for time period longer than ninety (90) days. It will also allow the site to receive hazardous waste from other GD-OTS facilities.

I. INTRODUCTION

The draft renewed permit for Area 13 contains all of the standard conditions required by 35 IAC Parts 702, 703, and 724; and the applicable conditions of 35 IAC Part 724 for storage of hazardous waste in containers.

Area 13 is an existing facility that has been operating under its RCRA Permit since November 9, 2000, and prior to that date, under interim status since the effective date of RCRA (November 19, 1980).

II. DESCRIPTION OF FACILITY

A. General

GD-OTS Marion Operations manufactures small and medium caliber ammunition, solid propellant jet propulsion systems, and other ordnance devices under: (1) U.S. Government contracts for the purposes of national defense; and (2) under U.S. approved foreign subsidiaries contracts. In addition, GD-OTS Marion Operations operates research, development and testing activities as support activities.

Area 13 consists of earthen covered magazines designed for storage of explosives, eight (8) of which are used for the storage of hazardous waste generated from the facilities identified as I Area (USEPA ID No. IL6140090220, IEPA ID No. 1998620016), P Area (USEPA ID No. IL4140090222, IEPA ID No. 1998620017), and BF Complex (USEPA ID No. IL5140090221, IEPA ID No. 1998620015). The locations of I Area, P Area, BF Complex, and Area 13 are shown on Figure 1 attached to this Fact Sheet while the locations of the permitted magazines within Area 13 are shown on Figure 2 attached to this Fact Sheet.

Hazardous wastes generated at GD-OTS Marion Operations include scrap explosives from production or testing processes, residual explosives, explosives not meeting specifications, residuals from research and development operations or contaminated materials, which are hazardous for the EPA characteristics of ignitability (D001) or reactivity (D003). The aforementioned wastes may also be toxic for barium (D005), cadmium (D006), chromium (D007) and lead (D008).

B. Site Description

GD-OTS Marion Operations leases property and buildings from the U.S. Department of Interior (DOI) Fish and Wildlife Service's (USFWS) Crab Orchard National Wildlife Refuge (CONWR) and occupies operating and storage areas (facilities) in the south-central portion of Williamson County, Illinois. GD-OTS Marion Operations leases approximately 630 acres of CONWR property and occupies 320,000 square feet of operating building in rural Williamson County. The leased property is located approximately six (6) miles southwest of Marion, Illinois, and five (5) miles south of Carterville, Illinois. The mailing addresses and contact for the U.S. DOI and GD-OTS are as follows:

OWNER (since 8/5/47)

U.S. Department of the Interior
Fish and Wildlife Service
Attn: Justin Sexton
Refuge Manager
Crab Orchard National Wildlife Refuge
8588 Route 148
Marion, Illinois 62959

OPERATOR (since 2/26/01)

General Dynamics - OTS
Marion Operations
Attn: Diane Summerlin
Manager of Envir. Health and Safety
6658 Route 148
Marion, Illinois 62959

III. HAZARDOUS WASTE MANAGEMENT ACTIVITIES

A. Containers

GD-OTS Marion Operations stores explosives related hazardous waste within eight (8) storage magazines in Area 13. These magazines are constructed of steel-reinforced concrete in the shape of an igloo and are earth covered. These igloo style magazines were designed and built for the Department of Defense (DOD) during World War II for the storage of explosives and ordnance. The eight (8) magazines designated to store explosive related hazardous waste are identified as 13-1-14, 13-2-10, 13-2-14, 13-3-9, 13-3-10, 13-3-11, 13-3-13, and 13-6-14. The permitted storage capacity is 7,680 gallons per magazine. Hazardous waste containers within these buildings are stored upon wooden pallets, or wooden boards. The aforementioned wastes contain no free liquids.

Container permit conditions deal with properly managing the containers in accordance with the procedures and operating specifications; and constructing, operating, and maintaining the containment system in accordance with the design plans and operating specifications. Permit Conditions within Section II of this permit pertain to containers and implements the regulatory requirements of 35 IAC Parts 703 and 724, Subpart I.

B. Standard Permit Conditions

Permit Section III contains Standard Permit Conditions that are regulatory requirements of 35 IAC, Parts 702, 703 and 724. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to an Illinois EPA RCRA permit. These conditions include the effectiveness of the permit, permit actions, severability, permit expiration, monitoring and retention of records, transfer of permits, and compliance schedules.

IV. CORRECTIVE ACTION

- A. Section 3004 of RCRA and 35 IAC 724.201 requires RCRA permitted facilities to institute such necessary corrective action as to protect human health and the environment from all releases of hazardous wastes and hazardous constituents, as listed in Appendix H of 35 IAC 721, from any solid waste management unit (SWMU) at the facility. The Illinois EPA has determined the only SWMUs present at the facility were the RCRA regulated storage units.
- B. This permit defers completion of corrective action of the eight (8) hazardous waste container storage areas until they undergo RCRA closure. In addition, this

permit contains requirements which must be met if a new SWMU is discovered at this facility in the future.

V. CONSIDERED PERMIT ACTIONS OTHER THAN RCRA

A. Air

The air emissions from a hazardous waste management facility are regulated under RCRA, the Clean Air Act (CAA), the Illinois Environmental Protection Act (Act), and State regulations at Title 35: Environmental Protection, Subtitle B: Air Pollution. Under these regulations, it is required to obtain a permit to install or operate any process which is, or may be, a source of air pollutants.

B. Water

A discharge of any waste waters from a hazardous waste management facility into the waters of the State, is required to have a National Pollutant Discharge Elimination System (NPDES) permit, issued by the Illinois EPA under Section 39(b) of the Act.

VI. PROCEDURES FOR REACHING A FINAL DECISION

Pursuant to 35 IAC 705.162(a)(2), the public is given forty-five (45) days to review the application and comment on the draft renewed permit conditions prior to the Illinois EPA taking any final permitting action on the application for this RCRA Hazardous Waste Management Permit. The comment period will begin on December 22, 2023, the date of publication of the public notice in a major local newspaper of general circulation. The comment period will end on February 5, 2024.

Copies of the permit application, draft permit and fact sheet are available for review on the Illinois EPA website, and at:

Marion City Hall
1102 Tower Square Plaza
Marion, Illinois 62959

The administrative record contains the permit application, draft permit, fact sheet, and other supporting documents and correspondence submitted to the Illinois EPA. The administrative record can be made available for public inspection by appointment only at the Illinois EPA's Springfield headquarters from 9:00 a.m. to 5:00 p.m., Monday through Friday. Inspection of the administrative record must be scheduled in advance by contacting Brad Frost at the address listed below.

In response to requests received during the comment period or at the discretion of the Illinois EPA, a public hearing may be held to clarify one or more issues concerning the permit application. A request for a public hearing must be submitted in writing and shall state the nature of the issues proposed to be raised at the hearing. Public notice of a public hearing will be issued at least forty-five (45) days before the hearing date.

For further information regarding the permit process, to submit written comments on the draft permit, or to request a public hearing, please contact:

Brad Frost, Office of Community Relations (#5)
Illinois Environmental Protection Agency
1021 N. Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217-782-7027

When the Illinois EPA makes its final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The permit will become effective thirty-five (35) days after service of notice of the decision or at a later date if stated in the permit unless the decision is appealed.

ATTACHMENTS

- I. Figure 1
- II. Figure 2

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Exhibit B-2-2 - Facility Map
 General Dynamics - OTS Area 13

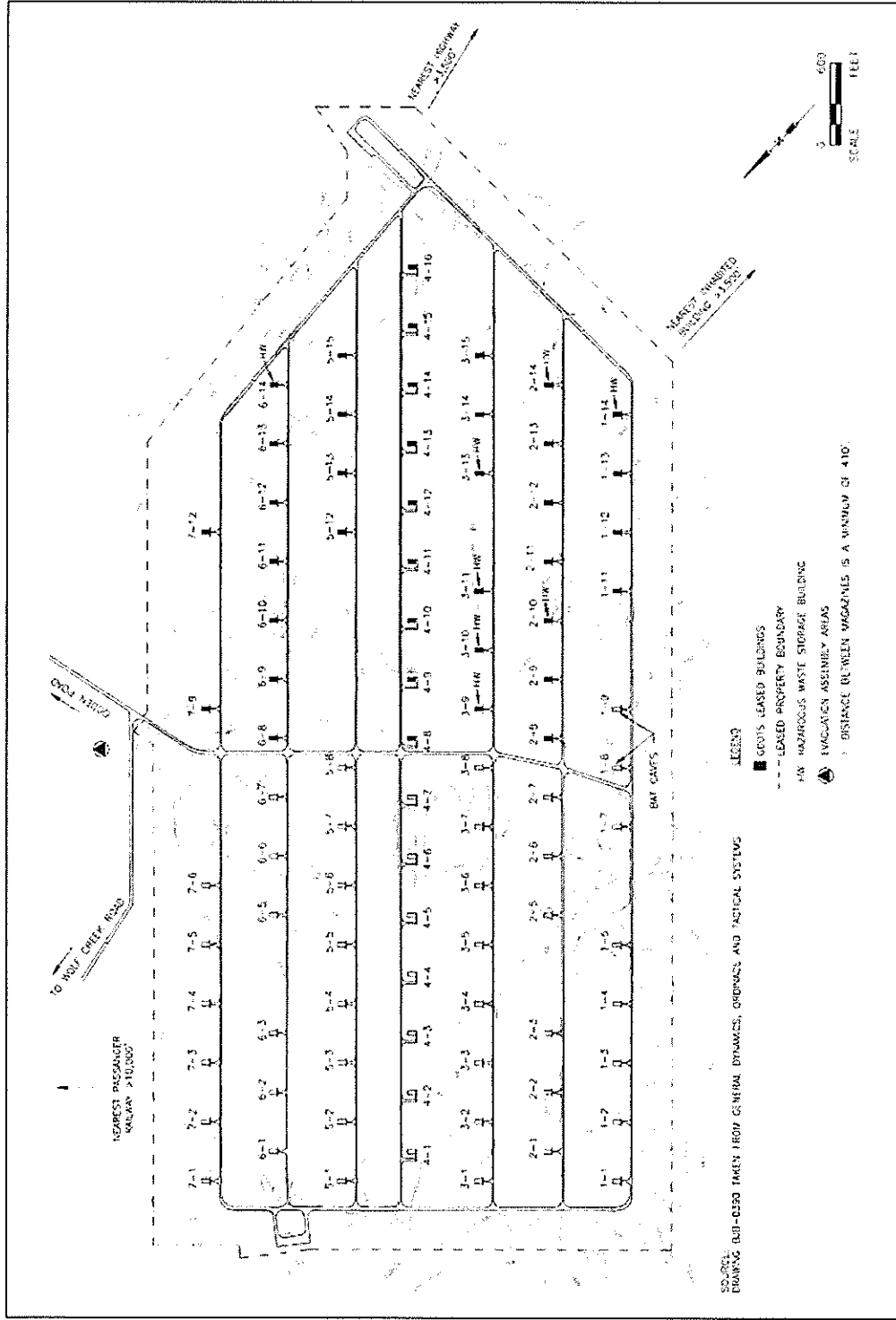


Figure 2

Rev: 10/19/2020



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1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

RCRA HAZARDOUS WASTE PERMIT

1998620013 – Williamson County
IL8143609487
General Dynamics OTS Area 13
Log No. B-104R2
RCRA Administrative Record

Issue Date:
Effective Date:
Expiration Date:

PERMITTEES

OWNER

U.S. Department of the Interior
Fish and Wildlife Service
Attn: Justin Sexton
Refuge Manager
Crab Orchard National Wildlife Refuge
8588 Route 148
Marion, Illinois 62959

OPERATOR

General Dynamics - OTS
Marion Operations
Attn: Diane Summerlin
Manager of Envir. Health and Safety
6658 Route 148
Marion, Illinois 62959

A renewed Resource Conservation and Recovery Act (RCRA) hazardous waste management permit is hereby issued to the U.S. Department of Interior (DOI) Fish and Wildlife Service's (USFWS) Crab Orchard National Wildlife Refuge (CONWR) as owner and the General Dynamics Ordnance and Tactical System (GD-OTS) Marion Operations (hereafter referred to as GD-OTS Marion Operations) as operator (herein known as the Permittees) pursuant to Section 39(d) of the Illinois Environmental Protection Act (Act) and Title 35 Illinois Administrative Code Subtitle G (35 IAC).

PERMITTED HAZARDOUS WASTE ACTIVITY

This permit requires the Permittees to operate a waste management facility involved in the storage of explosive related hazardous waste in accordance with the approved permit application and the conditions in this permit. The facility consists of eight (8) hazardous waste container storage areas located within the Ordill Area 13 (hereafter referred to as Area 13) on the Crab Orchard National Wildlife Refuge. Area 13 is located approximately six (6) miles southwest of Marion, Illinois, and five (5) miles south of Carterville, Illinois.

This permit consists of the conditions contained herein and those in the sections and attachments in this permit. The Permittees must comply with all terms and conditions of this permit and the applicable regulations contained in 35 IAC Parts 702, 703, 705 and 720 through 729

This permit is issued based on the information submitted in the approved permit application identified in Section II of this permit and any subsequent amendments. Any inaccuracies found

2125 S. First Street, Champaign, IL 61820 (217) 278-5800

1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120

9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200

412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022

4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

in the information provided in the permit application may be grounds for the termination or modification of this permit (see 35 IAC 702.187 and 702.186) and potential enforcement action (415 ILCS 5/44(h)).

DRAFT

Jacqueline M. Cooperider, P.E.
Permit Section Manager
Bureau of Land

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RCRA Hazardous Waste Permit

U.S. Department of Interior (Owner)

and

General Dynamics – OTS (Operator)

General Dynamics – OTS Area 13

State ID No. 1998620013

Federal ID No. IL8143609487

HAZARDOUS WASTE RCRA PERMIT

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SECTION I – GENERAL FACILITY DESCRIPTION

A. OWNER AND OPEATOR

The facility is owned by the U.S. Department of Interior (DOI) Fish and Wildlife Service's (USFWS) Crab Orchard National Wildlife Refuge (CONWR) and operated by General Dynamics Ordnance and Tactical Systems Division (GD-OTS) Marion Operations (hereafter referred to as GD-OTS Marion Operations), herein referred to as the "Permittees" defined in 35 IAC 702.121, 702.123 & 703.181.

GD-OTS Marion Operations leases property and buildings from the U.S. DOI/USFWS CONWR and occupies operating and storage areas (facilities) in the south-central portion of Williamson County, Illinois. GD-OTS Marion Operations lease agreement with the DOI/USFWS is for occupying and utilizing certain facilities for the purpose of manufacture of ammunitions and other ordnance devices. The mailing addresses for the U.S. DOI and GD-OTS Marion Operations are as follows:

OWNER

U.S. Department of the Interior
Fish and Wildlife Service
Crab Orchard National Wildlife Refuge
8588 Route 148
Marion, Illinois 62959

OPERATOR

General Dynamics - OTS
Marion Operations
6658 Route 148
Marion, Illinois 62959

B. LOCATION

1. Location of Facility

GD-OTS Area 13 (Area 13) facility is located in Williamson County of Illinois and is approximately six (6) miles southwest of Marion, Illinois and five (5) miles south of Carterville, Illinois. The facility address is 6000 West Ogden Road Marion, Illinois 62959.

2 Facility Layout Maps

Area 13 is situated in approximately 630 acres at this location with approximately 7.346 acres devoted to the management of hazardous waste. It consists of earthen covered magazines designed for storage of explosives, eight (8) of which are used for the storage of hazardous waste generated from the facilities identified as I Area (USEPA ID No. IL6140090220, IEPA ID No. 1998620016), P Area (USEPA ID No. IL4140090222, IEPA ID No. 1998620017), and BF Complex (USEPA ID No. IL5140090221, IEPA ID No. 1998620015). The locations of I Area, P Area, BF Complex, and Area 13 are shown on Figure 1 of Attachment B.

C. DESCRIPTION OF HAZARDOUS WASTE MANAGEMENT ACTIVITIES

GD-OTS Marion Operations manufactures small and medium caliber ammunition, solid propellant jet propulsion systems and other ordnance devices under: (1) U.S. Government contracts for the purposes of national defense; and (2) under U.S. approved foreign subsidiaries contracts. In addition, GD-OTS Marion Operations operates research, development and testing activities as support activities.

Area 13 is an existing facility that has been operating under its RCRA Permit since November 9, 2000, and prior to that date, under interim status since the effective date of RCRA (November 19, 1980). The last renewed permit was issued on June 29, 2011, and effective on August 3, 2011. The hazardous waste management activities consist of storage of hazardous waste in containers in eight (8) Area 13 storage magazines identified as 13-1-14, 13-2-10, 13-2-14, 13-3-9, 13-3-10, 13-3-11, 13-3-13, and 13-6-14. The locations of the aforementioned magazines within Area 13 are shown in Figure 2 of Attachment B.

Hazardous wastes generated at GD-OTS Marion Operations include scrap explosives from production or testing processes, residual explosives, explosives not meeting specifications, residuals from research and development operations or contaminated materials, which are hazardous for the EPA characteristics of ignitability (D001) or reactivity (D003). The aforementioned wastes may also be toxic for barium (D005), cadmium (D006), chromium (D007) and lead (D008).

SECTION II: CONTAINERS

A. SUMMARY

GD-OTS Marion Operations stores explosives related hazardous waste within eight (8) leased storage magazines located in the southern portion of Area 13 of the Crab Orchard National Wildlife Refuge. The storage magazines in the Area 13 facility are earth covered, steel reinforced concrete, igloo style construction. These igloo style magazines were designed and built for the Department of Defense (DOD) during World War II. The eight (8) magazines designated to store explosive related hazardous waste are identified as 13-1-14, 13-2-10, 13-2-14, 13-3-9, 13-3-10, 13-3-11, 13-3-13, and 13-6-14. The locations within Area 13 of the leased magazines permitted for storage are shown on Figure 2 of Attachment B of this permit.

B. DESCRIPTION OF CONTAINER STORAGE AREA(S) AND WASTES

1. The Permittees may store a maximum volume of 7,680 gallons in a single hazardous waste storage magazine for a total of 61,440 gallons in the container storage areas identified in this condition. The Permittees shall construct, operate, and maintain the container storage areas identified in this condition in accordance with the approved permit application and the conditions in this permit.

Storage Magazines at General Dynamics – OTS Area 13	
Identity of the Magazine	Maximum volume of waste (gallons)
13-1-14	7,680
13-2-10	7,680
13-2-14	7,680
13-3-9	7,680
13-3-10	7,680
13-3-11	7,680
13-3-13	7,680
13-6-14	7,680
Total Capacity	61,440

2. Storage of non-hazardous waste in areas specifically identified in Condition II.B.1 is prohibited.
3. The Permittees may only receive and store hazardous waste identified in Attachment B to this permit in the container storage areas identified above. All wastes must be evaluated through the waste analysis plan for compatibility.

C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittees shall transfer the hazardous waste from this container to a container that is in good condition or manage the waste in accordance with the approved permit application.

D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittees shall use a container made of or lined with material which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

E. MANAGEMENT OF CONTAINERS

The Permittees shall comply with the following management practices:

1. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
2. A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

F. INSPECTION

The Permittees shall inspect the container area weekly, in accordance with the inspection schedule in the approved permit application and the conditions in this permit, to detect leaks and deterioration of containers and the containment system caused by corrosion or other factors.

G. CONTAINMENT

The Permittees shall construct, operate, and maintain the containment system according to the design plans and operating specifications contained in the approved permit application.

H. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE

1. The Permittees shall not locate containers which hold ignitable or reactive waste within 50 feet of the facility's property line.
2. The Permittees shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste.

3. Ignitable or reactive wastes must be separated and protected from sources of ignition or reaction including but not limited to:
 - a. Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (e.g., static, electrical, or mechanical), spontaneous ignition (e.g., from heat producing chemical reactions), and radiant heat.
 - b. While ignitable or reactive waste is being handled, the Permittees must confine smoking and open flame to specially designated locations.
 - c. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. The Permittees shall not place incompatible wastes, or incompatible wastes and materials, in the same container, unless the procedures specified in the Approved Permit Application are followed.
2. Incompatible wastes or materials must not be placed in the same container unless precautions are taken to prevent reactions which:
 - a. Generate extreme heat or pressure, fire or explosions, or violent reactions;
 - b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
 - c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
 - d. Damage the structural integrity of the device or facility; or
 - e. Through other like means, threaten human health or the environment.

The basic methods for preventing such reactions are to:

- i. Treat one or both of the incompatible wastes/materials to render them compatible prior to placing them in the container.
- ii. Physically separate the incompatible wastes/materials in the containers so that it is not possible for the incompatible wastes/materials to come in contact with each other.

3. The Permittees shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
4. The Permittees shall not store containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments unless separated from the other material and protected from them by means of a dike, berm, wall, or other devices.

J. SPECIAL REQUIREMENTS FOR IGNITABLE AND COMBUSTIBLE WASTES

The Permittees shall store containers of ignitable and combustible wastes in an area separate from the area where all other wastes are stored. This separation shall be in addition to the separation of incompatibles required by 35 IAC 724.277.

K. CLOSURE

At closure, at a minimum, all hazardous waste and hazardous waste residues and constituents must be removed from the containment system. Remaining wastes, liners, bases, soil and groundwater containing or contaminated with hazardous waste, hazardous waste residue or hazardous constituents must be decontaminated or removed. Closure of the container storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The Permittees shall notify the Illinois EPA Bureau of Land Permit Section in writing of its intent to close the container storage area at least forty-five (45) days prior to the date closure is expected to begin. Along with this notification, the Permittees shall submit a sampling and analysis plan to be used in demonstrating the container storage area has been properly decontaminated. This plan must be approved by the Illinois EPA Bureau of Land Permit Section in writing prior to being implemented. The Illinois EPA review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Act. The response from the Illinois EPA will approve and establish:
 - a. The sampling and decontamination plan;
 - b. What the contaminants must be analyzed for;
 - c. Analytical requirements (SW-846 Methods should be utilized); and
 - d. The level at which decontamination or removal is considered complete.

2. Within sixty (60) days after closure of the container storage area is complete, the Permittees shall submit a certification to the Agency that the unit has been closed in accordance with the approved closure plan.

The closure certification form in Attachment F to this permit must be used. Signatures must meet the requirements of 35 IAC 702.126. The qualified Professional Engineer (registered in the State of Illinois) should be present at all critical, major points (activities) during the closure. These might include decontamination, integrity assessment of the unit and any sampling. The frequency of inspections by the qualified Professional Engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the area(s) until the Illinois EPA approves the closure certification for the unit. The Illinois EPA's review of closure certification for partial or final closure will be conducted in accordance with 35 IAC 724.211.

A Closure Documentation Report is to be submitted with the closure certification which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities.
 - b. A description of the method of waste handling and transport.
 - c. Copies of the waste manifests.
 - d. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
 - e. A chronological summary of closure activities and the cost involved.
 - f. Tests performed, with methods and results.
 - g. Color photographs of closure activities which document conditions before, during and after closure.
 - h. A scale drawing of all excavated or decontaminated areas and sample locations.
3. All sweepings, washwater, and rinsate generated during the closure of the unit shall be managed as a hazardous waste, unless it can be shown to be exempt under 35 IAC Part 721.
 4. To avoid creating another regulated storage unit during closure, it is recommended that any necessary permits for waste disposal are obtained prior to

initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, it should be done only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The 90-day accumulation time exemption (35 IAC 722.117) only applies to containers, tanks, containment buildings and drip pads.

5. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination, and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of forty (40) hours of safety and health training off site plus a minimum of three (3) days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight (8) hours of specialized training on managing hazardous waste operations.
6. If the Illinois EPA determines that implementation of the closure plan fails to satisfy the requirements of 35 IAC 724.211, the Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Act.

L. FINANCIAL ASSURANCE

The Permittees shall maintain financial assurance for closure of the container storage areas of at least \$787,347.93 (in 2022 dollars). A summary of the cost estimate for closure of the container storage areas is provided in Section 1 of Attachment G to this permit. The financial assurance maintained by the facility shall be sufficient to meet the requirements at 35 IAC 724, Subpart H.

SECTION III: STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Illinois Environmental Protection Act (Act) or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (Title 35 Illinois Administrative Code (35 IAC) 702.181)
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittees for a permit modification or reissuance, or a notification of planned changes or anticipated noncompliance on the part of the Permittees does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. **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 invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 705.202)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittees shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittees wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittees must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 IAC 702.142 and 703.125)
7. **PERMIT EXPIRATION.** This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittees has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittees the Illinois EPA has not issued a new permit as set forth in 35 IAC 702.125.
8. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It shall not be a defense for the Permittees 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. (35 IAC 702.143)

9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the Permittees shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittees shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittees 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. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittees shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittees shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittees shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittees' premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - 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 this permit; and
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)
 - 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 must be the appropriate method from Appendix A of 35 IAC Part 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
 - b. The Permittees 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 this permit, and records of all data used to complete the application for this permit for a period of at least three (3) years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The permittees shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
 - c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)
14. REPORTING PLANNED CHANGES. The Permittees shall give written notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.280. (35 IAC 702.152(a))
15. CONSTRUCTION CERTIFICATION. For a new hazardous waste management facility, the permittees shall not commence treatment, storage or disposal of hazardous waste; and

for a facility being modified the permittees shall not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

- a. The Permittees has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the Permittees and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - b.
 - i. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
 - ii. If, within fifteen (15) days of the date of submission of the letter in paragraph (a), the permittees have not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived and the Permittees may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.247)
16. ANTICIPATED NONCOMPLIANCE. The Permittees shall give advanced written notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, regulations, or the Act. (35 IAC 702.152(b))
17. TRANSFER OF PERMITS. This permit may not be transferred by the Permittees to a new owner or operator unless the permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator shall submit a revised permit application no later than ninety (90) days prior to the scheduled change. (35 IAC 703.260)
18. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
19. COMPLIANCE SCHEDULES. 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 specified in 35 IAC 702.162. (35 IAC 702.152(e))
20. TWENTY-FOUR HOUR REPORTING.
- a. The Permittees shall report to the Illinois EPA any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within twenty-four (24) hours from the time the Permittees

becomes aware of the following circumstances. This report shall include the following:

- i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the hazardous waste management (HWM) facility, which could threaten the environment or human health outside the facility.
- b. The description of the occurrence and its cause shall include:
- i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within five (5) days of the time the Permittees becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and 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 recurrence of the noncompliance. The Illinois EPA may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))
21. **OTHER NONCOMPLIANCE.** The Permittees shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 18, 19 and 20, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 20. (35 IAC 702.152(g))

22. OTHER INFORMATION. Where the Permittees 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 Illinois EPA, the Permittees shall promptly submit such facts or information. (35 IAC 702.152(h))
23. REPORTING REQUIREMENTS. The following reports required by 35 IAC 724 shall be submitted in addition to those required by 35 IAC 702.152 (reporting requirements):
- a. Manifest discrepancy report: if a significant discrepancy in a manifest is discovered, the permittees must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within fifteen (15) days after receiving the waste, the permittees must immediately submit to the Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
 - b. Unmanifested waste report: The permittees must submit to the Illinois EPA within fifteen (15) days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
 - c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)
24. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:
- Illinois Environmental Protection Agency
Bureau of Land
Division of Land Pollution Control #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
25. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
26. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC Part 161.
27. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittees shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:

- a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
 - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
 - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
 - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
 - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
 - f. Operating record as required by 35 IAC 724.173 and this permit.
 - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.
28. WASTE MINIMIZATION. The Permittees shall certify at least annually that the Permittees has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittees to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittees which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

GENERAL FACILITY STANDARDS

29. NOTICE OF WASTE FROM A FOREIGN SOURCE. The Permittees who have arranged to receive hazardous waste from a foreign source must notify the Illinois EPA in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))
30. NOTICE OF WASTE FROM OFF-SITE. The Permittees who receive hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the Permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittees must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))
31. GENERAL WASTE ANALYSIS. The Permittees shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
32. SECURITY. The Permittees shall comply with the security provisions of 35 IAC 724.114(b) and (c).
33. GENERAL INSPECTION REQUIREMENTS. The Permittees shall follow the approved inspection schedule. The Permittees shall remedy any deterioration or malfunction

discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).

34. PERSONNEL TRAINING. The Permittees shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).
35. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE. The Permittees shall comply with the requirements of 35 IAC 724.117.
36. CLOSURE REQUIREMENTS FOR ACCUMULATION AREAS. The Permittees shall close containers storage areas, tanks, drip pads, or containment buildings used for the accumulation of on-site generated hazardous waste in accordance with the requirements identified at 35 IAC 722.117(a)(8).

PREPAREDNESS AND PREVENTION

37. DESIGN AND OPERATION OF FACILITY. The Permittees shall maintain and operate the facility 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 which could threaten human health or the environment. (35 IAC 724.131)
38. REQUIRED EQUIPMENT. The Permittees shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
39. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittees shall test and maintain the equipment specified in the contingency plan and this permit as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
40. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittees shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
41. REQUIRED AISLE SPACE. The Permittees shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
42. ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS. The Permittees shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittees, the Permittees must document this refusal in the operating record.

CONTINGENCY PLAN

43. **IMPLEMENTATION OF PLAN.** The provisions of the contingency plan must be carried out by the Permittees immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored or disposed) (35 IAC 703.241). Within fifteen (15) days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Illinois EPA as required by 35 IAC 724.156(j).
44. **COPIES OF PLAN.** A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
45. **AMENDMENTS TO PLAN.** The Permittees shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
46. **EMERGENCY COORDINATOR.** A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

MANIFEST SYSTEM RECORD KEEPING AND REPORTING

47. **MANIFEST SYSTEM.** The Permittees shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176.
48. **OPERATING RECORD.** The Permittees shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
49. **ANNUAL REPORT.** The Permittees shall prepare and submit an annual report to the Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

CLOSURE

50. **PERFORMANCE STANDARD.** The Permittees shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
51. **AMENDMENT TO CLOSURE PLAN.** The Permittees must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).

52. NOTIFICATION OF CLOSURE. The Permittees shall notify the Illinois EPA at least sixty (60) days prior to the date it expects to begin closure. (35 IAC 724.212(d))
53. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittees shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
54. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittees shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure plan. (35 IAC 724.214)
55. CERTIFICATION OF CLOSURE. When closure is completed, the Permittees shall submit certification to the Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
56. COST ESTIMATE FOR FACILITY CLOSURE. The Permittees' original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
 - a. Adjusted for inflation sixty (60) days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 35 IAC 724.243. However, if the owner/operator is using the financial test or corporate guarantee, it must be updated for inflation within 30 days after close of the firm's fiscal year, and before the submission of updated information to the Illinois EPA as specified in 35 IAC 724.243(f).
 - b. Revised no later than thirty (30) days after the Illinois EPA has approved a request to modify the closure plan, if the change in the closure plan increases the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.242)
 - d. Made immediately available to the Illinois EPA personnel upon the Illinois EPA request.
 - e. Maintained at the value approved by the Illinois EPA with annual adjustment for inflation and cannot be decreased unless approved by the Illinois EPA in a permit modification.
57. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittees shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.243.

Financial assurance documents submitted to Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Financial Assurance Program
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

58. **LIABILITY REQUIREMENTS.** The Permittees shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
59. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittees shall comply with 35 IAC 724.248 whenever necessary.

LAND DISPOSAL RESTRICTIONS

60. **DISPOSAL PROHIBITION.** Any waste identified in 35 IAC 728, Subpart C, or any mixture of such a waste with nonrestricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
61. **DILUTION PROHIBITION.** The Permittees shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
62. **WASTE ANALYSIS.**
 - a. The Permittees must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
 - b. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittees must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.

- c. If the treatment residues do not meet the treatment standards, or if the Permittees ships any restricted wastes to a different facility, the Permittees shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).

63. STORAGE RESTRICTIONS

- a. The Permittees shall not store hazardous wastes restricted from land disposal under 35 IAC Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and:
(1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150.
- b. The Permittees must comply with the operating record requirements of 35 IAC 724.173.

64. NEW DETERMINATIONS OF PROHIBITED WASTES

Wastes which are prohibited from land disposal under 35 IAC 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to the conditions number 60 through 63 above.

7. The requirements of 35 IAC Parts 620 and 742 must be met, when applicable, in establishing remediation objectives for corrective action. In addition, all corrective action efforts must meet the requirements of 35 IAC 724.201.
8. All Illinois EPA final decisions regarding RCRA corrective action at this facility are subject to the appeal provisions of the Illinois Environmental Protection Act (Act).

B. REQUIREMENTS FOR ADDRESSING NEWLY- IDENTIFIED SWMU(s) and AREAS of CONCERN AOC(s)

1. The Permittees shall notify the Illinois EPA in writing of any newly-identified SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The notification shall provide the following information, as available:
 - a. The location of the newly-identified SWMU or AOC in relation to other SWMUs or AOCs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit or area (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU or AOC, to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous constituents from the newly identified SWMU, the Illinois EPA may request in writing, that the Permittees prepare a SWMU Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit. This SWMU Assessment plan must also propose investigations, including field investigations, if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient

SECTION IV: CORRECTIVE ACTION

A. INTRODUCTION

1. In accordance with Section 3004 of RCRA and Title 35 Illinois Administrative Code (35 IAC) 724.201, the Permittees shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents from any solid waste management unit (SWMU) at its facility in Marion, Illinois. This section contains the conditions which must be followed to ensure these requirements are met.
2. The permittees must conduct a RCRA Facility Investigation (RFI) as appropriate to: (1) characterize each SWMU of concern at the facility; (2) determine whether releases of hazardous wastes and hazardous constituents have occurred from each SWMU of concern, and if so, the nature and extent of the release(s); and (3) gather other data, as necessary, to be used in determining the need, scope and design of a Corrective Measures Program (CMP).
3. The Permittees must develop and implement a CMP to protect human health and the environment from any of the SWMUs of concern at the facility.
4. From the information obtained through an Illinois EPA file search, facility notifications, and an on-site facility assessment, the Illinois EPA developed a RCRA Facility Assessment (RFA) for this facility in which existing SWMUs were identified. A copy of this RFA report is available in Illinois EPA's Files. It was determined that the only SWMUs at this facility were the hazardous waste container storage areas listed in Condition II.B.1 of this permit (13-1-14, 13-2-10, 13-2-14, 13-3-9, 13-3-10, 13-3-11, 13-3-13, and 13-6-14). Potential releases to the environment from the existing SWMUs at this facility will be investigated through the RCRA closure of these units.
5. No corrective action activity has been carried out in accordance with Section III of the renewed RCRA permit issued on June 29, 2011, (Log No. B-104R) by Illinois EPA and no additional SWMUs have been identified in the second renewal permit application for the facility. However, the Permittees must provide corrective action, as appropriate, for: (1) any newly discovered SWMU or area of concern (AOC); or (2) future releases for existing SWMUs.
6. The Permittees must carry out interim measures in accordance with the terms, conditions and requirements of this permit to address existing or future contamination at the facility until such time as a final corrective measure can be developed and implemented.

to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.

3. Within ninety (90) days after receipt of the Illinois EPA's request for a SWMU Assessment Plan, the Permittees shall submit a SWMU Assessment Plan to the Illinois EPA for review and approval.
4. The Illinois EPA shall either approve, conditionally approve or disapprove the SWMU Assessment Plan in writing. If the plan is approved, the Permittees shall implement the SWMU Assessment Plan within forty-five (45) days of receiving such written notification or in according to the terms and schedule established within the SWMU Assessment Plan and any conditions placed on it. If the SWMU Assessment Plan is disapproved, the Illinois EPA shall notify the Permittees in writing of the Plan's deficiencies and specify a due date for submittal of a revised plan.
5. The Permittees shall submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan.
6. The Permittees must implement a CMP, as necessary, to properly address any contamination encountered during the assessment. Guidance regarding the implementation of this program will be provided at the time Illinois EPA notifies the Permittees of the need for such a program.

C. FUTURE RELEASES FROM SWMUs

There exists a potential that a release may occur in the future from SWMUs identified in the RFI which did not require any corrective action at the time that the RFI was completed. If the Permittees discovers that a release has occurred from such a SWMU in the future, then the Illinois EPA must be notified of this release within thirty (30) days after its discovery following the procedures set forth in Condition IV.B. above. Additional investigation and, as necessary, corrective measures efforts at this SWMU must be carried out in accordance with the procedure set forth in Condition IV.B above. The results of all corrective action efforts required by this condition must meet the requirements of 35 IAC 724.201.

D. CORRECTIVE MEASURES REQUIREMENTS

1. If it is determined that corrective measures must be taken at a SWMU, then the Permittees must implement a CMP for such SWMUs in general accordance with the procedures set forth in Attachment E to this permit. The corrective measures implemented by the Permittees must be sufficient to ensure the appropriate requirements of 35 IAC Parts 302, 620, 724, and 742 are met.
2. The types of corrective measures which may be implemented include, but are not limited to:
 - a. Removal of the contaminants or the contaminated media so that the remaining media meet remediation objectives developed in accordance with 35 IAC Part 742;
 - b. Closing the SWMU as a landfill by establishing a proper final cover over the SWMU and then providing proper long-term monitoring/maintenance/management of: (1) leachate; (2) subsurface gas; (3) final cover system; and (4) groundwater;
 - c. Establishing engineered barriers to restrict exposure to the contaminants remaining at the SWMU (necessary to certain remediation objectives developed in accordance with 35 IAC Part 742); and
 - d. Establishing institutional controls to restrict activities at the facility, as necessary, to support remediation objectives established in accordance with 35 IAC Part 742.
3. The CMP described in Attachment E consists of five phases:
 - a. Phase I--conceptual design of the selected corrective measure.
 - b. Phase II--development of the final design plans for the corrective measure, including installation and operation/maintenance plans.
 - c. Phase III--actual construction/installation/implementation of the corrective measure.
 - d. Phase IV--operation/maintenance/monitoring, as necessary, of the corrective measure to ensure it is being properly implemented and is properly protecting human health and the environment.

- e. Phase V--demonstration/verification that the corrective measure has been completed and that the established remediation objectives have been achieved.
 - f. Phases may be combined or skipped, depending on the actual corrective measure selected. The overall CMP implemented at a given SWMU must: (1) be logical in nature; and (2) allow for Illinois oversight and approval throughout the entire process. As such, it will be necessary for the Permittees to submit workplans and reports regarding all aspects of corrective measures for the Illinois EPA review and approval prior to carrying out any corrective measure activity.
4. A Phase I CMP Plan, or its equivalent, must be submitted to the Illinois EPA within ninety (90) days of the date that the Illinois EPA notifies the Permittees of the need for a CMP.
 5. Subsequent CMP related workplans and reports must be submitted to the Illinois EPA for review and approval in accordance with a schedule approved by the Illinois EPA.
 6. For units closed as landfills:
 - a. The Phase II report must include a plan for the construction of a final cover system as well as a post-closure care plan (the post-closure care plan must include provisions for: (1) inspecting the final cover; (2) monitoring the groundwater and soil gas; and (3) taking corrective action if any problems are observed during the inspection/monitoring effort.
 - b. The Phase III report must document the construction of the approved final cover system and any other systems required for closure of the unit.
 - c. During Phase IV, quarterly reports must be submitted documenting the results of the inspection/monitoring efforts as well as any corrective measures taken in response to problems observed during these efforts. It will be necessary to submit plans to the Illinois EPA for review and approval to address any groundwater quality or gas migration problems.
 - d. The Phase V report will not be submitted until the post-closure care period has been completed. This report must demonstrate that all applicable post-closure requirements have been met and that the groundwater at the site meets the applicable standards.
 7. Once all corrective measures have been completed, a report must be developed documenting all efforts and results associated with the completed measure,

including, as appropriate, information demonstrating the approved remediation objectives for the project have been achieved.

8. The Illinois EPA's action on all CMP submittals shall be subject to the appeal provisions of Sections 39(a) and 40(a) of the Act.

E. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. As indicated in Condition IV.A above, no corrective action is currently required to be completed at this facility. Thus the current cost estimate for completing corrective action at this facility is \$0. However, the financial assurance requirements of 35 IAC 724.201 must also be met for any investigative or corrective action efforts carried out in accordance with Condition IV.A.2. and Subsection IV.D above. Thus, detailed cost estimates must be developed for any activities carried out under requirements of Section IV of this permit and must accompany any workplan/report submitted to Illinois EPA for review and approval.
2. The Permittees shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition IV.E.1 above. The words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. This documentation shall be submitted to the Illinois EPA within sixty (60) days after the Illinois EPA's approval of the initial or revised cost estimates required under Condition IV.E.1. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that acceptable under 35 IAC 724.246 at its discretion.
3. The cost estimate must be supported by a detailed breakdown of the estimated third party cost for completing each required task. The amount of the various resources needed to complete each task must be provided, as well as the unit cost of these resources and an adjustment for contingencies. Justification for all data used in these calculations must also be provided.
4. All cost estimates prepared under the requirements of Conditions IV.E.1 through IV.E.3 must be submitted as a Class 1* permit modification request in accordance with 35 IAC 703.281.
5. Financial assurance for corrective action must be updated, as necessary, to reflect the current status of the RCRA corrective action program at this facility. In addition, financial assurance for corrective action must be adjusted annually, as necessary for inflation.

F. INTERIM MEASURES/STABILIZATION

The Permittees shall carry out interim measures/stabilization activities in order to prevent or mitigate the migration of a current or future release of hazardous substances into the environment, and to provide adequate protection of public health, welfare and the environment.

1. Consistent with the annual reporting requirements of this permit, the Permittees shall submit a report assessing the effectiveness of the interim measures being carried out in accordance with this permit. Based on a review of this report, the Illinois EPA reserves the right to require additional interim measures be carried out if it is determined that the interim measure is unable to protect human health and the environment.

This annual report should at a minimum contain the following information regarding each system which comprises the interim measure:

- a. A discussion of each system's operation during the year. This discussion should address: (1) actual daily, weekly and monthly flow rates through each system; (2) any periods when the systems were not operating; and (3) deviations from the design operating procedures for the system (such as problems with drawing an adequate vacuum, downtime due to equipment failure, etc.);
- b. Results of all monitoring efforts carried out during the year;
- c. A discussion of the effectiveness of the system supported as appropriate with data and calculations;
- d. Recommended changes, if any, which should be made to the system to improve its effectiveness.

The Illinois EPA reserves the right to require the Permittees to remove or treat soil if the Illinois EPA determines that contaminants are present in the soils at levels such that the remediation system is unable to protect human health and the environment. Remediation objectives for corrective measures will be established by the Illinois EPA at a later date.

2. The interim measure required by this permit may not be sufficient to meet the final requirements for corrective action for remediation for this site. The adequacy of the interim measure will be addressed upon Illinois EPA review and approval of the RFI Reports and the Corrective Measures Plan, as required by this permit. As such, the Permittees may be required to expand this interim measure as

necessary to address existing or additional contamination detected through RFI investigations.

3. The Illinois EPA reserves the right to require revision and modification of the interim measures implemented by the facility should it be determined by the Illinois EPA through information obtained through facility monitoring that the interim measures approved by this portion of the permit are ineffective in protecting human health and the environment.
4. At any time during the RFI, the Permittees may initiate additional interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of the RFI investigation prior to implementing an interim measure if the Illinois EPA and the Permittees agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMP.
5. Prior to implementing any interim measures beyond those specified above, the Permittees must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
6. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittees that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the RFI or of any other portion of the permit.
7. If the Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittees will be notified by way of an Illinois EPA initiated permit modification.

SECTION V: SPECIAL PERMIT CONDITIONS

- A. The container storage units identified in Section I of this permit (13-1-14, 13-2-10, 13-2-14, 13-3-9, 13-3-10, 13-3-11, 13-3-13, and 13-6-14) shall only be used for storage of wastes generated by GD-OTS Marion Operations at facilities owned or operated by GD-OTS Marion Operations, including wastes which are transported between sites or facilities owned, and operated by GD-OTS Marion Operations. These wastes shall be limited to those which are identified in Section C of GD-OTS's approved permit application.
- B. Before any the Permittees' personnel, or its duly authorized representatives, enter the fenced enclosure at each hazardous waste storage unit, each person must be equipped with, or have access to, a two-way radio to ensure immediate communication capabilities in the event of an emergency. These radios may be either vehicle-mounted or hand-held. In the event of an emergency, the Permittees must immediately notify plant security personnel by use of the two-way radio or cell phones. These two-way radios must be tested for performance before each issuance in accordance with the Inspection Schedule included as Attachment D to this permit.
- C. The portion of the operating record which describes the volume, type and storage method for the hazardous wastes stored in Area 13 storage units, which is available to the Emergency Coordinator in the event of a fire, release, or explosion, must be updated daily to accurately reflect the hazardous waste storage conditions for each of the storage buildings within Area 13.
- D. Any residual materials from an event which requires implementation of the facility contingency plan must be collected and placed in containers compatible with the materials stored. The residual materials must be analyzed for hazardous characteristics in accordance with SW-846 analytical methods. These materials must be analyzed for TCLP metals, nitrates, ignitability, reactivity, and total cyanides to properly classify these materials as wastes.
- E. The Permittees must maintain a six-foot chain link fence around the entrance to each individual hazardous waste storage unit. Each fence shall have only one gate, and this gate shall be kept locked except when personnel are entering or leaving the storage bunker. Only the Permittees' personnel, their duly authorized representatives, or Department of Interior personnel accompanied by GD-OTS personnel shall have access to the fence enclosures. Additionally, warning signs with the wording meeting the requirements of 35 IAC 724.114(c) shall be posted on the fenced enclosure and each side of the enclosure on bunker wall. Signs shall be in place before wastes are stored in bunker. In addition, a spill kit and water collection drum must be kept near the door of each building only when wastes are stored in bunkers.
- F. The Permittees are allowed to accumulate one drum of bunker condensate water outside of the hazardous waste container storage bunker and within the fenced boundary of the unit.

The Permittees shall take all necessary precautions to prevent the condensate water accumulated in the drum from commingling or coming into contact with the hazardous wastes stored within each unit. The Permittees shall institute the necessary procedures to properly characterize the condensate water in accordance with the applicable provisions of 35 IAC 808.121, and 722.111 (if necessary).

G. **CONTINGENCY PLAN**

1. The Permittees shall implement the facility contingency plan contained in the approved permit application at any time there is: (1) a release of hazardous waste, or (2) a fire or explosion which involves hazardous waste or which occurs in areas where hazardous wastes are treated, stored or disposed in Area 13.
2. Based on air modeling results contained in the approved permit application, the types and volumes of waste permitted for storage at Area 13 will not have an impact off-site if spills, fire or explosions of propellants occur. Therefore, the local response entities are not required to be notified because of spills, fire or explosions unless it is found that the actual release may have an off-site impact. Then the Permittees shall contact the local emergency response entities as soon as possible after implementation of the contingency plan:
 - a. The entities which must be notified include:
 1. Williamson County Sheriff's Department
 2. Williamson County Office of Emergency Management
 3. Lake Egypt, Herrin, Marion and Carterville Fire Departments
 4. Illinois Emergency Management Agency Local Coordinator
 5. Illinois Environmental Protection Agency, Emergency Response Unit
 6. National Response Center
 7. Illinois EPA Field Office (Marion Region)
 8. Illinois State Police Department
 9. U.S. Department of Interior, Fish & Wildlife Service
 - b. The information which must be initially relayed to each entity includes:
 1. The type of emergency (release, fire or explosion);

2. The type of wastes involved in the emergency, and the approximate quantity involved;
 3. An initial assessment of the conditions at the site and whether outside help is needed to properly respond to the situation.
- c. If the Permittees is able to properly respond to the emergency without any aid from the entities identified in Condition V.G.2.a above, the Permittees shall notify each of these entities that the emergency situation no longer exists once all required emergency response and cleanup activities have been completed.
3. The Permittees shall provide applicable local emergency entities with changes/modifications to the contingency plan and offer to meet and review the plan on an annual basis. Copies of the meeting notes and list of attendees shall be placed in the facility's operating record and be available to Illinois EPA for review upon verbal or written request.

H. **REQUIRED FORMS**

1. The Permittees shall provide a completed Illinois EPA permit application form LPC-PA23 with all permit applications, permit modifications, and additional information that are submitted to the Illinois EPA Bureau of Land.
2. The Permittees shall submit current 39(i) certifications and supporting documentation with all applications for a permit.

I. **COMPLIANCE SCHEDULE**

1. The owner and operator shall submit the necessary 39(i) certification form(s) and supporting documentation within 30-day of any of the following events:
 - a. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has been found to have violated federal, State, or local laws, regulations, standards, or ordinances in the operation of waste management facilities or sites; or
 - b. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has been convicted in this or another State of any crime which is a felony under the laws of this State, or conviction of a felony in a federal court; or
 - c. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has committed

an act of gross carelessness or incompetence in handling, storing, processing, transporting, or disposing of waste.

- d. A new person is associated with the owner or operator who can sign the permit application or who has control over operating decisions regarding the facility, such as a corporate officer or a delegated employee.

The 39(i) certification must describe the violation(s), convictions, carelessness, or incompetence as outlined in Conditions V.I.1.a, b, or c above and must include the date that a new person as described in Condition V.I.2.d above began employment with the applicant.

The 39(i) certification form and supporting documentation shall be submitted to the address specified below:

Illinois Environmental Protection Agency
Bureau of Land #33 – 39i Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

[The 39(i) certification forms will be treated as confidential by the Agency. The applicant may also request the information on the 39(i) certification form be maintained confidential in accordance with 2 IAC 1828.]

SECTION VI: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
SECTION II: CONTAINER STORAGE		
K.1	Notify Illinois EPA of intent to close container storage area	At least 45 days prior to commencement of closure.
K.1	Submit decontamination and/or soil sampling and analysis plan for review	At least 45 days prior to commencement of closure.
K.2	Submit certification for closure of container storage area	No later than 60 days after closure of container storage area is complete.
L	Update financial assurance	No later than 60 days after permit modification is effective.
SECTION III: STANDARD CONDITIONS		
6.	Complete application for new permit.	At least 180 days prior to permit expiration.
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.
14	Notify Illinois EPA of planned physical alterations or additions.	As soon as possible.
16	Notify Illinois EPA of planned changes which may result in permit noncompliance.	Advanced written notice.
17	Application for permit modification indicating permit is to be transferred.	At least 90 days prior to transfer.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
19	Submission of any information required in a compliance schedule.	Within 14 days after each schedule date.
20	Report to Illinois EPA any non-compliance which may endanger health or environment.	
	telephone	Within 24 hours after discovery.
	in writing	Within 5 days after discovery.
21	Report all other instances of noncompliance.	March 1 of each year along with Annual Report.
29	Notify Illinois EPA in writing of expected receipt of hazardous waste from foreign source.	At least 4 weeks prior to receipt of waste.
43	Implementation of Contingency Plan.	
	Notify appropriate state and local roles.	As needed.
	Notify appropriate local officials.	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable.
	Notify the Illinois EPA (217/782-3637) or Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility.	Immediately after determination made.
	Notify Illinois EPA and appropriate state and local authorities, in writing that facility is in compliance with 35 IAC 724.156(h).	Prior to resuming operation in affected areas.
	Report to Illinois EPA details regarding incident which required implementation of contingency plan.	Within 15 days after event.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
49	Submit annual report required by 35 IAC 724.175.	March 1 of each year.
51	Application for permit modification amending closure plan.	At least 60 days prior to the proposed change.
52	Notify Illinois EPA that expecting to close.	At least 60 days prior to beginning closure.
55	Submit closure certification.	Within 60 days after completion of closure.
56(a)	Adjust closure cost estimate for inflation.	Within 60 days prior anniversary date.
56(b)	Revision of closure cost estimate.	Within 30 days after approval.
57	Change in financial assurance mechanism for closure.	As needed.
58	Change in coverage for sudden and non-sudden accidental occurrences.	Within 30 days of the occurrences.
59	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings.	Within 10 days after commencement of proceeding.
SECTION IV: CORRECTIVE ACTION		
B.1	Notify newly-identified SWMU/AOC.	Within 30 days after discovery.
B.3	Submit SWMU Assessment Plan.	Within 90 days of Illinois EPA's request.
B.4	Implement SWMU Assessment Plan	Within 45 days of Approval

ATTACHMENT A

Approved Permit Application

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT A

APPROVED PERMIT APPLICATION

A. APPROVED PERMIT APPLICATION

This permit is based on the information in the approved permit application. The approved permit application consists of the following documents:

<u>Document</u>	<u>Date</u>	<u>Date Received</u>
RCRA Permit Application	January, 25 2021	February 2, 2021
Additional Information	April 12, 2021	April 15, 2021
Additional Information	October 27, 2021	November 12, 2021
Extension	March 30, 2023	April 7, 2023
Additional Information	May 3, 2023	June 1, 2023

ATTACHMENT B

Facility Maps

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

Exhibit B-2-2 - Facility Map
 General Dynamics - OTS Area 13

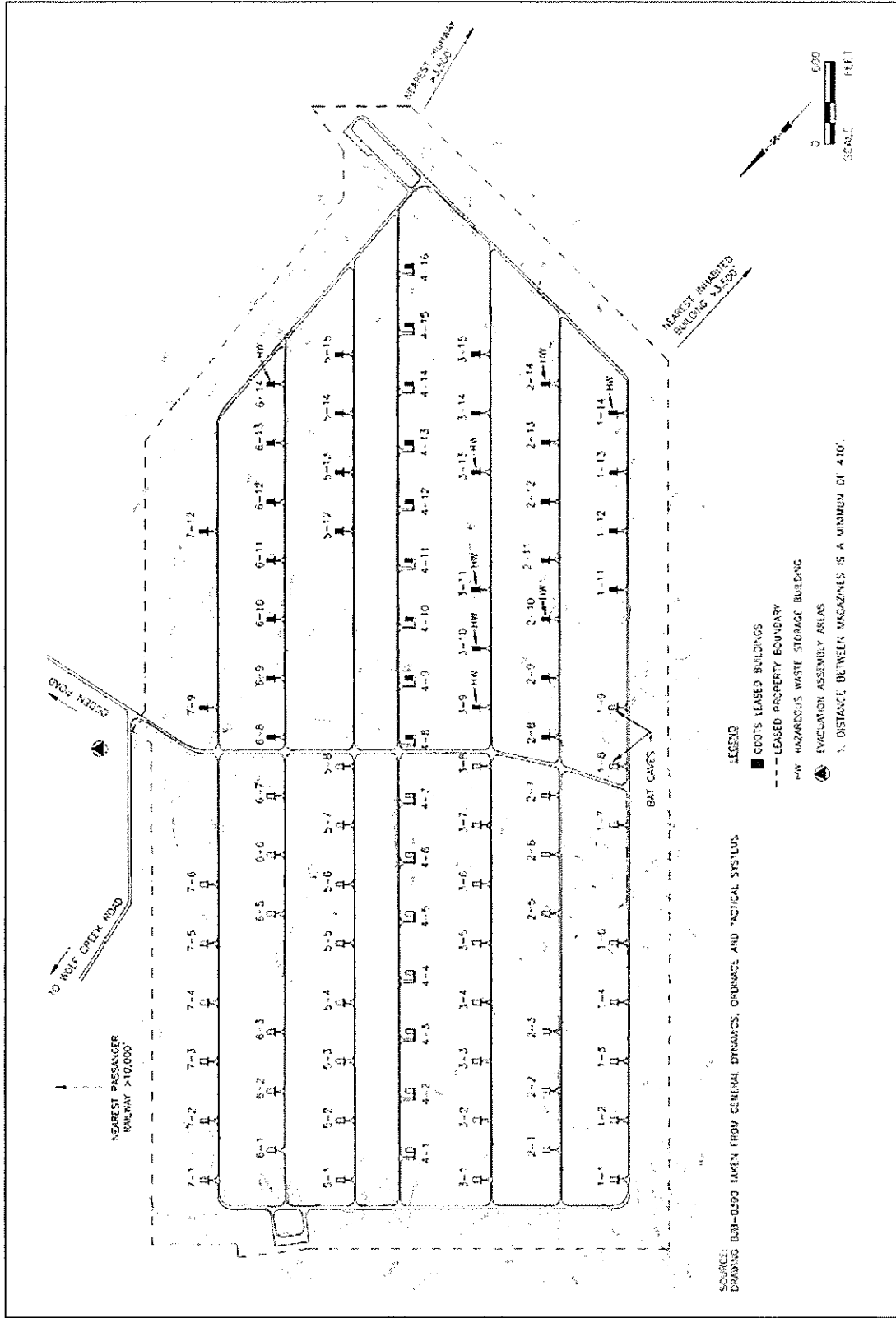


Figure 2

ATTACHMENT C

Waste Lists and Hazardous Waste Identification Numbers

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT C

WASTE LISTS AND HAZARDOUS WASTE IDENTIFICATION NUMBERS

EPA Hazardous Waste Number

Description of Hazardous Waste

D001/D003

Scrap explosives from production or testing processes, residual explosives, explosives not meeting specifications, residuals from research and development operations or contaminated materials

Note -- The above wastes may also be toxic for barium (D005), cadmium (D006), chromium (D007) and lead (D008).

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ATTACHMENT D

Inspection Schedule

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT D

Inspection Schedule for Hazardous Waste
Container Storage Magazines

<u>Inspection Item</u>	<u>Frequency</u>	<u>Procedure</u>
1. SECURITY STRUCTURES/ EQUIPMENT		
Gate	Weekly	Visual
Warning Signs	Weekly	Visual
Two-way radio	Before Each Use	Physical
Personnel Protective Equipment	Weekly	Visual
Primary Roads Within Facility	Weekly	Visual
2. BUILDING		
Door	Weekly	Visual
Warning Signs	Weekly	Visual
Base Imperviousness	Monthly	Visual
Secondary Containment	Weekly	Visual
Spill Kits	Monthly/ after each use	Visual
Floor Sealant	Weekly	Visual
3. CONTAINERS		
Leaking/Deterioration	Weekly	Visual
Aisle Spacing	Weekly	Visual
Collection Drum	Monthly	Visual

Note: These inspections need only be conducted if containers are being stored in the magazine.

ATTACHMENT E

RCRA Corrective Measures Program Requirements

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT E

CORRECTIVE MEASURES PROGRAM REQUIREMENTS

1.0 INTRODUCTION/PURPOSE

RCRA Corrective Action projects typically consist of two phases: (1) A RCRA Facility Investigation (RFI) where an investigation is conducted at the solid waste management units (SWMU's) of concern at a facility; and (2) implementation of corrective measures needed to properly address any contaminant encountered during the RFI. This document has been developed to outline the procedures to be carried out to implement a corrective measure program.

2.0 BRIEF OVERVIEW OF A RCRA CORRECTIVE MEASURES PROGRAM

Typically, at the end of an RFI, the concentration of contaminants present in the soil/sediments/groundwater/surface waters at a SWMU or other area of concern (AOC) is compared to remediation objectives developed in accordance with Title 35 Illinois Administrative Code (35 IAC) Part 742. If the contaminant levels are above these objectives, then some type of corrective measure must be completed to achieve these objectives. In addition, certain corrective measures may need to be carried out to support the established remediation objectives (i.e., the establishment of engineered barriers and/or institutional controls). However, at a unit where waste or high levels of contamination remains, a decision may be made to close the unit as a landfill and then provide post-closure rather than removing the material and/or achieving remediation objectives developed in accordance with 35 IAC Part 742.

To allow for a logical and orderly progression in developing and implementing necessary corrective measures, the Corrective Measures Program (CMP) being carried out in accordance with this RCRA permit should be carried out in five phases which build on each other. It is not necessary for a CMP at a given SWMU or other AOCs to follow these five phases step-by-step; rather, phases can be combined and/or skipped, depending on the actual remedial measure selected. The overall CMP implemented must set forth a logical path for its implementation and allow for Illinois EPA oversight and approval throughout the entire process.

A brief discussion of the five phases of a CMP is as follows:

1. Phase I is the conceptual design of the selected corrective measure(s).
2. Phase II is the development of final design plans for the corrective measure, including installation and operation/maintenance plans.
3. Phase III is the actual construction/installation of the selected corrective measure.

4. Phase IV is the operation, maintenance, and monitoring of the selected corrective measure to ensure it is properly protecting human health and the environment.
5. Phase V is the final demonstration/verification that the implemented corrective measure achieved the approved remedial objectives.

Sections 3.0 through 7.0 which follow provide a more detailed discussion of each of these five phases. Section 8.0 has been developed to describe the CMP which may be used in lieu of the afore-mentioned five phase procedure when soil removal is the selected remedy. It must be noted that work plans, reports, etc. must be developed to document how the Permittees carries out the required CMP at each SWMU or other AOCs. All such documents must be reviewed and approved by Illinois EPA prior to their implementation.

3.0 PHASE I OF THE CMP

Phase I of the CMP includes selection of the corrective measure to be taken and developing a basis for completing the final design of the measure. This effort should be documented in a Conceptual Design Report which describes the proposed corrective measure for each SWMU and other AOC and provides a conceptual design for these measures. The main criteria for Illinois EPA review is whether the proposed corrective measures are able to achieve the final cleanup objectives previously established by the Permittees and the Illinois EPA and/or provide the necessary institutional controls to prevent the migration of contaminants from the SWMU of concern. Based upon a review of the Conceptual Design Report, the Illinois EPA may approve the corrective measures, require revisions to the proposed corrective measures, or require that a totally new corrective measures proposal be submitted to the Illinois EPA.

The Conceptual Design Report should contain the following sections:

1. Introduction/Purpose. This section should contain: (1) general background information regarding the project; (2) the purpose and goals of the submittal; and (3) the scope of the project.
2. Existing Site Conditions. This section should contain a summary of the investigative activities conducted for each of the units of concern. Investigation analytical results should be provided in tabular form, and maps depicting both the horizontal and vertical extent of contamination at the site should be provided.
3. Evaluation for Potential Future Migration. Based on the existing site conditions, a conceptual model of the site should be developed and presented in this section. The potential for additional future migration of contamination for each of the units of concern must then be evaluated, especially those units which have been determined to have released hazardous waste/hazardous constituents to the groundwater. It may be helpful to develop conceptual models for contaminant migration. Of special concern in this evaluation are (1) the physical properties of the contaminants (solubility, volatility,

mobility, etc.); and (2) existing site conditions (types of soil present, location of contamination, hydrology, geology, etc.).

4. **Corrective Measures Objectives.** This section should discuss the general objectives of the proposed corrective measure to be constructed/installed, and the ability of the proposed corrective measure to achieve the established remediation objectives (unless the selected corrective measure is closure as a landfill which will require proper establishment of a final cover and proper post-closure care of the closed unit).
5. **Identification of Options Available.** This section should contain a brief discussion of the various options available to achieve the corrective measures objectives for each unit. This discussion should identify: (1) a general overview of each option available, including how the option will achieve the stated objective; (2) the advantages associated with each option; (3) the disadvantages associated with each option and (4) an estimate of the cost associated with choosing each remedial option.
6. **Description of Selected Corrective Measure.** This section should contain a qualitative discussion of the corrective measure chosen, along with the rationale which was used to select this measure from all those identified initially. This discussion should include documentation that the selected corrective measure will be effective.
7. **Identification of Design Criteria.** This section should identify what information must be available to design the selected corrective measure.
8. **Review of Available Information.** This section should contain an evaluation of the existing information to ensure that it is sufficient to complete the design of the selected corrective measure. If insufficient information is available, then the report should contain procedures for collecting the required additional information.
9. **Procedures for Completing the Design.** This section should contain a description of the procedures which will be followed to complete the design of the corrective measure. This should include as appropriate:
 - a. Identification of the references and established guidance which will be used in designing the selected corrective measure. Justification for the selection of this procedure should also be provided.
 - b. A description of the procedures which will be used to complete the design of the corrective measure.
 - c. Identification of assumptions to be used in the design, and the impact these assumptions have on the overall corrective measure;
 - d. Significant data to be used in the design effort;

- e. Identification and discussion of the major equations to be used in the design effort (including a reference to the source of the equations);
- f. Sample calculations to be used in the design effort;
- g. Conceptual process/schematic diagrams;
- h. A site plan showing a preliminary layout of the selected corrective measure;
- i. Tables giving preliminary mass balances;
- j. Site safety and security provisions.

This information will form the technical basis for the detailed design of the remedial measure and the preparation of construction plans/specifications.

- 10. Identification of Required Permits. This section should identify and describe any necessary permits associated with the selected corrective measure, as well as the procedures which will be used to obtain these permits.
- 11. Long lead Procurement Considerations. This section should identify any elements/components of the selected corrective measure which will require a large amount of time to obtain/install. The following issues should also be discussed: (1) the reason why it will take a large amount of time to obtain/install the item; (2) the length of time necessary for procurement and (3) recognized sources of such items.
- 12. Project Management. This section should contain information regarding the procedures and personnel which will be involved in completing the design of the selected corrective measure. A schedule for completing the design should also be provided.

4.0 PHASE II OF THE CMP

Once the Illinois EPA approves the Conceptual Design Report, the facility should complete the design of the approved corrective action (Phase II of the CMP). Upon final completion of the design, a Final Design Report, consisting of final plans, specifications, construction work plan, etc., must be submitted to the Illinois EPA for review and approval.

Several documents must be submitted to the Illinois EPA as part of Phase II of the CMP. The following text describes the expected contents of the various documents which should be developed and submitted to the Illinois EPA as part of Phase II of the CMP.

- 1. Final Design Report and Construction Work Plan. The Final Design Report and Construction Work Plan must contain the detailed plans, specifications and drawings

needed to construct the corrective measure. In addition, this document must contain (1) calculations, data etc., in support of the final design; and (2) a detailed description of the overall management strategy, construction quality assurance procedures and schedule for constructing the corrective measure. It must be noted that the approved Conceptual Design Report forms the basis for this final report. The information which should be provided in this document includes:

- a. Introduction/Purpose. This portion of the document should: (1) provide background information regarding the project, (2) describe the purpose and goals of the project, and (3) describe the scope of the project.
- b. Detailed Plans of the Design System, including the following:
 - 1) Plan views;
 - 2) Section and supplementary views which, together with the specifications and general layouts, facilitate construction of the designed system;
 - 3) Dimensions and relative elevations of structures;
 - 4) Location and outline form of the equipment;
 - 5) Ground elevations; and
 - 6) Descriptive notations, as necessary, for clarity.
- c. Technical Specifications. Complete technical specifications for the construction of the system, including, but are not limited to, the following:
 - 1) All construction information, not shown in the drawings, which is necessary to inform the contractor in detail as to the required quality of materials, workmanship, and fabrication of the project;
 - 2) The type, size, strength, and operating characteristics of the equipment;
 - 3) The complete requirements for all mechanical and electrical equipment, including machinery, valves, piping and jointing of pipe;
 - 4) Electrical apparatus, wiring and meters;
 - 5) Construction materials;
 - 6) Chemicals, when used;

- 7) Miscellaneous appurtenances;
 - 8) Instruction for testing materials and equipment as necessary; and
 - 9) Availability of soil boring information.
- d. **Project Management.** A description of the construction management approach, including the levels of authority and responsibility, lines of communication and qualifications of key personnel who will direct corrective measures construction/installation must be provided in the work plan.
 - e. **Construction Quality Assurance/Quality Control.** A construction quality assurance/quality control plan describing the procedures which will be followed to ensure the corrective measure is constructed/installed in accordance with the approved plans and specifications.
 - f. **Schedule.** The work plan must contain a schedule for completion of all major activities associated with construction/installation of the selected corrective measures. All major points of the construction/installation should be highlighted.
 - g. **Waste Management Practices.** This portion of the document should identify the wastes anticipated to be generated during the construction/installation of the corrective measures and provide a description of the procedures for appropriate characterization and management of these wastes.
 - h. **Required Permits.** Copies of permit applications submitted to other Bureaus of the Illinois EPA for the selected corrective measure must be provided in the report. If it is determined that no permit is required for construction/installation and implementation of the corrective measures, rationale and justification must be provided to support this contention.
 - i. **Cleanup Verification.** The report must contain the procedures which will be followed that the approved remediation objectives have been achieved when operation of the system is completed.
2. **Operation and Maintenance Plan.** An Operation and Maintenance Plan must be developed and submitted as part of Phase II of the CMP. This plan should outline the procedures for performing operations, long term maintenance, and monitoring of the corrective measure.
 - a. **Introduction and Purpose.** This portion of the document should provide a brief description of the facility operations, scope of the corrective measures project, and summary of the project objectives.

- b. **System Description.** This portion of the document should provide a description of the corrective measure and significant equipment, including manufacturer's specifications. This portion of the permit should also include a narrative of how the selected system equipment is capable of complying with the final engineered design of the corrective measure.
- c. **Operation and Maintenance Procedures.** This portion of the document should provide a description of the normal operation and maintenance procedures for the corrective measures system, including:
 - 1) Description of tasks for operation;
 - 2) Description of tasks for maintenance;
 - 3) Description of prescribed treatment or operation conditions; and
 - 4) Schedule showing the frequency of each operation and maintenance task.
- d. **Inspection Schedule.** This portion of the document should provide a description of the procedures for inspection of the corrective measures system, including problems to look for during the inspection procedure, specific inspection items, and frequency of the inspections.
- e. **Waste Management Practices.** This portion of the document should provide a description of the wastes generated by the corrective measure, and the appropriate procedures for proper characterization/management of these wastes.
- f. **Contingency Procedures.** This portion of the document should provide a description of the procedures which will address the following items:
 - 1) System breakdowns and operational problems including a list of redundant and emergency backup equipment and procedures;
 - 2) Alternative procedures (i.e., stabilization) which are to be implemented in the event that the corrective measure fails. The alternative procedures must be able to prevent release or threatened releases of hazardous wastes/hazardous constituents which may endanger human health and the environment, or exceed cleanup standards.
 - 3) Notification of facility and regulatory personnel in the event of a breakdown in the corrective measures, including written notification identifying what occurred, what response action is being taken and any potential impacts on human health and the environment.

5.0 PHASE III OF THE CMP

Once the final design report is approved by the Illinois EPA, construction/installation of the approved corrective measure must commence. During this period, quarterly reports should be submitted which contain the following information:

1. Summary of activities completed during the reporting period;
2. An estimate of the percentage of the work completed;
3. Summaries of all actual or proposed changes to the approved plans and specifications or its implementation;
4. Summaries of all actual or potential problems encountered during the reporting period;
5. Proposal for correcting any problems; and
6. Projected work for the next reporting period.

Upon completion of construction/installation of the approved corrective measure, a Construction Completion Report must be submitted to the Illinois EPA documenting that these efforts were carried out in accordance with the Illinois EPA approved plans and specifications. This report should contain a thorough description of the efforts that went into constructing/installing the corrective measure and demonstrate that the procedures in the Illinois EPA approved Final Design Report were followed during this effort. Such a report should be formatted in a logical and orderly manner and contain the following information:

1. An introduction discussing the background of the project and the purpose and scope of the corrective measure described in the report.
2. Identification of the plans, technical specifications and drawings which were used in constructing/installing the corrective measure. These specifications and drawings should have been approved by the Illinois EPA during Phase II.
3. Identification of any variations from the Illinois EPA approved plans, technical specifications and drawings used in construction/installing the corrective measure. Justification regarding the need to vary from the approved plans and specifications must also be provided.
4. A description of the procedures used to construct/install the corrective measure, including the procedures used for quality assurance and quality control.
5. As built drawings, including identification of any variations from the approved plans, technical specifications and drawings.

6. A summary of all test results from the construction/installation effort, including quality assurance/quality control testing.
7. Actual test results, including quality assurance/quality control test results. These results should be located in an attachment/appendix and be well organized.
8. Identification of any test results which did not meet the specified value and a description of the action taken in response to this failure, including re testing efforts.
9. Photographs documenting the various phases of construction.
10. A detailed discussion of how the construction/installation effort met the requirements of the approved Final Design Report.
11. A certification meeting the requirements of 35 IAC 702.126 by an independent qualified, licensed professional engineer and by an authorized representative of the owner/operator.

6.0 PHASE IV OF THE CMP

Once the corrective measure has been constructed/installed, it must be operated, maintained and monitored in accordance with the approved plans and specifications (this is Phase IV of the CMP). During this period, quarterly reports must be submitted to the Illinois EPA documenting the results of these efforts. These reports include the following:

1. Introduction. -- A brief description of the facility operations, scope of the corrective measures project, and summary of the project objectives.
2. System Description. -- A description of the corrective measures constructed/installed at the site, and identify significant equipment. Describe the corrective measure and identify significant equipment.
3. Monitoring Results. -- A description of the monitoring and inspection procedures to be performed on the corrective measures. A summary of the monitoring results for the corrective measures, including copies of any laboratory analyses which document system effectiveness, provide a description of the monitoring procedures and inspections performed, and include a summary of the monitoring results for the corrective measure. Copies of all laboratory analytical results which document system monitoring must be provided.
4. Effectiveness Determination. -- Calculations and other relevant documentation which demonstrates the effectiveness of the selected corrective measure in remediating/stabilizing contamination to the extent anticipated by the corrective measures

final design. Copies of relevant analytical data should be provided to substantiate this determination.

5. System Effectiveness Recommendation. -- Based upon the results of the effectiveness determination required under Item 4 above, recommendations on continued operation of the corrective measure must be provided. If the corrective measure is not performing in accordance with the final design, a recommendation on revisions or expansion of the system should be provided.

7.0 PHASE V OF THE CMP

Once all corrective measures have been completed, a report must be developed documenting all the efforts which were carried out as part of implementing the corrective measure and demonstrating, as appropriate, that the approved remediation objectives have been achieved. This report should contain a compilation of all previous reports and also contain sufficient information to demonstrate that the approved remediation objectives have been achieved. It must be noted that such a report will not be developed for a unit closed as a landfill until the post-closure care period has been completed.

8.0 PROCEDURES WHICH SHOULD BE FOLLOWED WHEN SOIL REMOVAL IS THE SELECTED CORRECTIVE MEASURE

Sections 3.0 through 6.0 above describe the procedures which should be followed when it is necessary to design a physical corrective measure (e.g., a final cover system, some type of treatment system, etc.). However, such detail is not necessary if excavation/removal is selected as the remedial action for the contaminated soil encountered at the site. In general, a work plan should be developed for this effort (for Illinois EPA review and approval) which fully describes each step to be used in removing the contaminated soil from the property. This includes a description of (1) the equipment utilized in the removal effort, (2) the pattern followed in removing the soil; (3) the depth to which the soil will be removed; (4) management of the soil on-site after it is removed from the ground; (5) loading areas; (6) the ultimate destination of the soil; and (7) any other steps critical to the removal effort.

One way to conduct a soil removal effort is to collect and analyze a sufficient number of soil samples to clearly determine the horizontal and vertical extent of soil contamination prior to conducting the soil removal effort. The boundaries of soil which must be removed are defined by the Illinois EPA established cleanup objectives for the project. Soil excavation must extend to sample locations where soil test results indicate that the remediation objectives are met. Closure verification sampling is not necessary in such cases, if a registered professional engineer oversees the soil removal effort and certifies that the remediation limits extend to these boundaries.

Another way to conduct a soil removal effort is to collect and analyze a limited number of soil

samples prior to the soil removal effort and to rely mainly on field observation to determine the extent of the soil removal. In such cases closure verification sampling is necessary. Soil samples must be collected for analysis from the bottom and sidewalls of the final excavation. The following sampling/analysis effort is necessary to demonstrate that the remaining soil meets the established cleanup objectives:

1. A grid system should be established over the excavation.
2. Samples should be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.
3. Samples should be collected at 6"-12" below the ground surface (bgs) along the excavation sidewalls at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.
4. Collection/analysis of all required samples must be in accordance with the procedures set forth in the approved plan.
5. Soil samples which must be analyzed for volatile organic compounds (VOCs) must be collected in accordance with the procedures set forth in Method 5035 of SW-846. In addition, such samples must be collected 6"-12" beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.
6. No random sampling may be conducted to verify achievement of cleanup objectives have been met.
7. Additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the AOC meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with the procedures described above from areas where additional soil has been removed.

ATTACHMENT F

Closure Certification Forms

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT F

CERTIFICATION OF COMPLETION OF RCRA CLOSURE

General Dynamics OTS Area 13 – Williamson County

USEPA ID: IL8143609487

RCRA Closure Log No. C-XXX

To meet the requirements of 35 Illinois Administrative Code (35 IAC) 725.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 IAC 702.126) and by a qualified professional engineer upon completion of closure of the UNIT NAME. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste management unit, known as the UNIT NAME, at FACILITY NAME has been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved closure plan is attached.

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 fine and imprisonment for knowing violations.

A person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS5/44(h))

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Facility Name		Printed Name of Responsible Officer	
<hr/>		<hr/>	
Signature of Owner/Operator	Date	Printed Title of Responsible Officer	
Responsible Officer			
<hr/>		<hr/>	
Signature of Licensed P.E.	Date	Printed Name of Licensed P.E. and Illinois License Number	
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Mailing Address of P.E.:		Licensed P.E.'s Seal:	
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ATTACHMENT G

Financial Assurance/Liability Requirements

General Dynamics – OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT G**FINANCIAL ASSURANCE/LIABILITY REQUIREMENTS****1. CLOSURE**

The Permittees shall maintain financial assurance under the requirements of 35 Illinois Administrative Code (35 IAC) Part 724, Subpart H, for closure for the amounts indicated below (the estimates set forth herein must be adjusted for inflation when demonstrating adequate financial assurance in 2022 and every year thereafter).

Closure of Container Storage Areas	\$787,347.93
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*Basis – Year 2022

2. LIABILITY REQUIREMENTS

The Permittees shall maintain liability coverage during the active life (including the closure period) of the hazardous waste management units at this facility in the following amounts:

- a. Liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

3. CORRECTIVE ACTION

The Permittees shall maintain financial assurance under the requirements of 35 IAC 724.201 and 35 IAC Part 724, Subpart H for corrective action. The current amount of financial assurance which must be provided for corrective action is \$0.

ATTACHMENT H

List of Plans and Documents Contained in
the Approved Permit Application

General Dynamics - OTS Area 13

State ID No. 1998620013

IL8143609487

Log No.: B-104R2

ATTACHMENT H**LIST OF PLANS AND DOCUMENTS CONTAINED IN THE
APPROVED PERMIT APPLICATION**

Pursuant to Illinois hazardous waste management requirements, General Dynamics Ordnance and Tactical Systems Division Marion Operations has prepared the following formal plans and documents covering the various facets of the design, operation and monitoring its hazardous waste management unit. The issuance of this permit on (date of issuance) approves the plans and documents identified below unless otherwise indicated in the permit.

<u>Plan or Document</u>	<u>Location in the Approved Permit Application</u>	<u>Received Date</u>
1. Waste Analysis Plan	Section C and Exhibit C-2-1	2/2/2021
2. Design and Operating Plans, Specifications and Procedures for Container Storage	Section D	2/2/2021
3. Inspection Plan	Section F.2 and Exhibit F-2-1	2/2/2021
4. Contingency Plan Log No. B-104R-M-1	Section G.2 and Exhibit G-2-2	6/1/2023
5. Training Program	Section H.1	2/2/2021
6. Closure Plan	Section I.1 and Exhibit I-1-1	6/1/2023