ATTACHMENT 20

IDLING PROCEDURES

Idling Procedures

The following procedures are those that the Permittee must complete in order to be able to demonstrate to the Division, through the submission of analytical data, that a waste management unit at the facility has been cleaned adequately in order to be idled, as defined in Module X of the Permit. These procedures contain only the cleaning and sampling requirements associated with this process. The administrative requirements associated with this process are found in Module X of this Permit.

All waste generated during cleaning operations will be considered RCRA/PCB waste and will be managed accordingly. In addition, stains that are due to rust and do not coincide with chemical spills will not require analysis.

Analytical data will be required to meet the following standards:

a. PCB Wipe Samples - results must be less than or equal to 10 ug/100cm$^{2.}$

b. Rinsate Samples - PCB - results must be less than .5 ppb in rinsate samples

c. Rinsate Samples - RCRA - results must be less than or equal to the values specified in Table I-1.3 found in Attachment 8, the Closure Plan.

Hoses removed from tanker unloading areas or the Special Handling Bay (Unit 538) will either be cleaned and verified that they are clean through sampling and analysis using the wipe samples and the standard identified above or be disposed of as a RCRA and/or PCB waste.

Carbon absorbers removed from the tanker unloading areas and the Special Handling Bay (Unit 538) will be disposed of as a hazardous waste and a PCB waste when applicable.

Unit 053 - Sampling Station

1. Clean the sampling station platform, rails, and structure, to a standard of visible cleanliness.

2. Obtain ten wipe samples from the sampling station platform, structure and rails. The samples shall be taken from areas that are stained. If there are not ten areas that are stained, the remaining samples will be taken randomly from the platform, structure and rails. In addition, replicate and blank samples will also be collected.

3. PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas that do not meet the standard shall be cleaned and tested again until the concentration of less than or equal to 10 ug/100 cm^2 is achieved.

4. Each wipe sample will be given a unique identification number. In addition, the location of each wipe sample will be maintained as part of the operating record. The analytical results generated from each of the wipe samples will be also be incorporated into the operating record.

Unit 101 - Container Management Building

1. Remove all waste from the building.

2. Clean floors, walk ways, sampling stations, and sumps in the containment bays and the working areas at the north and south ends of each of the rooms.

3. Obtain five wipe samples per sumped area with at least one wipe sample from the bottom of each sump. Obtain replicate and blank samples (PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas that do not meet that specification must be cleaned again and tested until the 10 ug/100 cm^2 standard is achieved.). The wipe samples should be taken from areas that are stained. If the stained areas of a sumped area exceed the minimum five samples required, the Permittee is required to additional obtain wipe samples from the other unsampled stained areas. These samples must also meet the above standard.

4. Each wipe sample will be given a unique identification number. In addition, the location of each wipe sample will be maintained as part of the operating record. The analytical results generated from each of the wipe samples will be also be incorporated in the operating record.

Unit 102 - Container Shredding and Repackaging Facility

1. Remove all waste from the building.

2. Clean the shredder as described in Attachment 4 of the permit for monthly inspections.

3. Mechanically clean the shredder elevator and the external surfaces of the shredder port access areas, feed and discharge chambers, and cap the ends of the discharge chutes.

4. Flush, using each decant wand and pump, the decant lines to each Unit 103 tank so that each wand and pump and segment of pipe will have been flushed with three volumes of clean solvent, blow the lines clear with nitrogen and empty the pumps.

5. Remove and dispose of the wands.

6. Cap the pipes where the wands attached.

7. Take PCB wipe samples as follows (priority shall be given to stained areas indicating spills):

   a. one from the elevator platform to the shredder.
   b. one from the exterior of the entrance to the shredder.
   c. four evenly distributed at the ported access areas for the shredder.
   c. four at the exit of the shredder solids discharge chute.
   d. two at the exit of the shredder liquids discharge chute.
   e. one every four feet of conveyor and platform.
   f. In addition, obtain replicate and blank samples.

   Note: PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

8. Clean the containment area floors and sumps.

9. Obtain 25 wipe samples from the floor surfaces inside the containment area including at least one from the bottom of each sump in the building (samples must be less than or equal to 10 ug/100 cm^2). Obtain replicate and blank samples as well.

10. Reclean the Unit 102 floor and sump surfaces and resample according to step 9, until the PCB standards are met.

11. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample

identification number.

Unit 103 - Decant Storage Tanks

1. Empty the tanks as much as possible through normal means either to a tanker or the tank farm.

2. Flush all lines to the tank farm or tanker with clean solvent and then blow the lines with nitrogen to empty the lines. Drain other portions of the system that still may contain liquid. Flush all lines that have carried PCBs per 40CFR§761.79.

3. Open the tanks and remove sludge from the bottom of the tank.

4. Rinse the inside tank surfaces with clean solvent to remove gross contamination and remove this rinse from the tank (no large amount of contamination nor any liquid is to remain in the tank). Flush tanks that have held PCBs per 40CFR§761.79.

5. Replace the manway(s) and flanges of the tank so it can be easily reopened to allow inspection by UDSHW personnel.

6. After authorization by UDSHW personnel, replace the manway(s) and flanges of the tank.

7. Clean the exterior of the tanks, pumps and piping to a visibly clean standard, removing everything that appears waste-like. Sample to assure cleanup of areas that indicate contamination meet the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

8. Clean the containment area. Sample and analyze stains that remain indicating spills. Samples must meet the less than or equal to 10 ug/100 cm^2 to confirm cleanup.

9. Sample the final rinse of water from each sump.

10. Analyze each sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is it is less than .5 ppb.

11. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 10 above are met.

12. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

13. If nitrogen is not going to be provided to the tanks:

    a. remove the activated carbon from the carbon adsorption system and dispose of as a hazardous waste and ,
    b. conduct an initial demonstration and then quarterly thereafter while the tanks are idled, confirming that the atmosphere within the tanks is not explosive.

Unit 104 - Intermodal Transfer Unit

1. Clean the cement pad to a visibly clean standard. Sample stained areas indicating spill to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

2. Obtain five wipe samples with at least one wipe sample from the bottom of the sump. In addition, obtain replicate and blank samples. PCB wipe samples must be less than or equal to less than or equal to 10 ug/100 cm^2 PCB. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

3. Sample the final rinse water from the sump.

4. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

5. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 4 above are met.

6. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 105 - Thaw Unit

1. Remove all waste from the building.

2. Clean floors, walk ways and sumps.

3. Obtain five wipe samples per each sumped area with at least one wipe sample from the bottom of each sump. In addition, replicate and blank samples will be obtained. PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

4. Sample the final rinse of water from each sump. Analyze each sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

5. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 4 above are achieved.

Unit 106 - Bulk Solids Storage

Subunit 1 Building

1. Remove all waste from the building.

2. Clean floors.

3. Obtain nine wipe samples per each sumped area with at least one wipe sample from the bottom of each sump. Obtain replicate and blank samples too. The wipe samples should be taken from areas that are stained. If the stained areas of a sumped area exceed the minimum nine samples required, the Permittee is required to additional obtain wipe samples from the other unsampled stained areas. (PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved).

4. Sample the final rinse of water from each sump. Analyze each sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

5. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 4 above are achieved.

Subunit 1, 2 & 3 Unenclosed Pads

1. Remove all waste from the pads.

2. Clean the containment.

3. Sample the final rinse of water from each sub-unit.

4. Analyze the each sample according to Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8).

5. Reclean and sample as necessary to achieve the levels specified in Table I-1.3 in the Closure Plan.

Unit 531/532 Truck Unloading Area

1. Clean strainers.

2. Flush all lines from Unit 531/532 Truck unloading area with clean solvent or water as appropriate and blow out the lines with nitrogen. Drain other portions of the system that may still contain fluid. Flush lines that have carried PCBs per 40CFR§761.79.

3. Remove all waste from the area.

4. Remove all unloading hoses from the area and manage as specified on page 1 of this attachment.

5. Remove carbon absorbers and cap lines.

6. Clean the exterior of the pumps, piping, and strainers to a visibly clean standard, removing all contamination that appears waste-like. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

7. Clean the containment area. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

8. Sample the final rinse water from the sump.

9. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

10. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 9 above are achieved.

11. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 536 - Waste Fuel Tank Farm Pumpable Sludge Unloading

1. Clean strainers.

2. Flush all lines from Unit 536 to the sludge tanks with clean solvent or water as appropriate, and blow out the lines with nitrogen. Drain other portions of the system that may still contain fluid. Flush lines that have carried PCBs per 40CFR§761.79.

3. Remove all waste from the area.

4. Remove all unloading hoses from the area and manage as specified on page 1 of this attachment.

5. Remove carbon absorber and cap the line.

6. Clean the exterior of the piping, pumps, and strainers to a visibly clean standard (remove everything that appears waste-like). Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

7. Clean the containment. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

8. Sample the final rinse water from the sump.

9. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

10. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 9 above are achieved.

11. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 538 - Special Handling Bay

1. Flush all lines from Unit 538 to the Burner Kiln with clean solvent, water or nitrogen as appropriate, and blow the lines with nitrogen to remove the fluid. Drain other portions of the system where fluid may be accumulated. Flush lines that have carried PCBs per 40CFR§761.79.

2. Remove all waste from the area.

3. Remove all unloading hoses from the area and manage as specified on page 1 of this attachment.

4. Remove carbon absorber and cap the line.

5. Clean the exterior of the pumps and piping to a visibly clean standard (remove everything that appears waste-like). Sample stained areas (indicating spills) to assure

cleanup to the 10 ug/100 cm^2 PCB cleanup standard.

6. Clean the containment area. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

7. Sample the final rinse water from the sump.

8. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

9. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 8 above are achieved.

10. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 601/602 Truck Unloading Area

1. Clean strainers.

2. Flush all lines from the Unit 601/602 Truck unloading area with water and blow the lines with nitrogen to remove the fluid. Drain other portions of the system where fluid may be accumulated. Flush lines that have carried PCBs per 40CFR§761.79.

3. Remove all waste from the area.

4. Remove all unloading hoses from the area and manage as specified on page 1 of this attachment.

5. Remove carbon absorbers and cap lines.

6. Clean the exterior of the piping, pumps, and strainers to a visibly clean standard, removing everything that appears waste-like. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

7. Clean the containment area. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

8. Sample the final rinse water from the sump.

9. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

10. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 9 above are achieved.

11. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Units 251 & 252 - Bulk Solids Tanks/Building

1. Remove gross contamination from the conveyor feed systems.

2. Feed 10 tons of limestone through each of the shredders and feed systems to both kilns to clean the internals of the shredders.

3. Open all conveying systems (apron feeders, flex wall conveyors, and the weigh belts) to the incinerators and remove remaining material accumulated within.

4. Remove all waste from the tanks to the maximum extent possible with the overhead clam shell and/or other equipment.

5. Clean overhead areas, rails, floors, walk ways, external surfaces of the shredders and sumps to visible cleanliness.

6. Decontaminate clamshells.

7. Empty the Unit 251 baghouse hopper and run conveyor dry.

8. Clean the tanks using brooms or shovels.

9. Obtain 29 wipe samples from each unit external to the tanks, including samples from each level and from the external surfaces of the shredders. Sampling preference shall be given to areas that are stained or may have been in contact with waste. Obtain replicate and blank samples as well (PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.).

10. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

11. Cover the inlet to each shredder.

12. Remove activated carbon from the 252 carbon absorber system and dispose of as hazardous waste.

<u>Units 531 through 534 - Waste Fuel Tank Farm</u>

1. Empty the tanks as much as possible through normal means either to a tanker or another tank farm tank.

2. Flush all lines with clean solvent and blow with nitrogen remove the liquid. Rinse all waste feed/recirculation lines to the incinerator with three volumes of clean fuel (Energetic Liquid lines) or clean water (Sludge lines) prior to shutting off waste feed and blow down each line with nitrogen. Flush lines that have carried PCBs per 40CFR§761.79.

3. Remove all flexible hoses from the area and manage as specified on page 1 of this attachment.

4. Open the tanks and remove sludge from the bottom of each of the tanks.

5. Rinse the inside tank surfaces with clean solvent to remove gross contamination and remove the rinsate from the tank (no large amount of contamination nor any liquid is to

remain in the tank). Flush lines that have contained PCBs per 40CFR§761.79.

6. Replace the manway(s) and flanges on the tank so the tank can be easily reopened to allow inspection by UDSHW personnel.

7. After authorization by UDSHW personnel, replace the manway(s) and flanges of the tank.

8. Clean the exterior of the tanks, pumps and piping to a visibly clean standard and remove everything that appears waste-like.

9. Two wipe samples will be obtained from the exterior of each tank that has stored PCB waste. These samples must be taken in the areas where contamination would most likely be present (i.e. areas with stains or where leaks had previously been documented). In addition, replicate and blank samples will be obtained and analyzed. PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

10. Clean the containment area. Obtain wipe samples from stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

11. Sample the final rinse water from each sump.

12. Analyze each sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

13. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

14. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB level specified in item 12 above are achieved.

15. If nitrogen is not going to be provided to the tanks:

a. remove the activated carbon from the carbon adsorption system and dispose of as a hazardous waste and,

b. conduct an initial demonstration and then quarterly thereafter while the tanks are idled, confirming that the atmosphere within the tanks is not explosive.

Units 601-602 - Waste Aqueous Tank Farm

1. Empty the tanks as much as possible through normal means either to a tanker or another tank farm tank.

2. Flush all lines with clean water and blow the lines clear with nitrogen. Rinse all waste feed/recirculation lines to the incinerator with three volumes of clean water prior to shutting off waste feed and blow down each line with nitrogen. Flush lines that have carried PCBs per 40CFR§761.79.

3. Remove all flexible hoses from the area and managed as specified on page 1 of this attachment.

4. Open the tanks and remove sludge from the bottom of the tanks.

5. Rinse the inside tank surfaces with clean water to remove gross contamination and remove this rinse from the tank (no large amount of contamination nor any liquid is to remain in the tank). Flush lines that have contained PCBs per 40CFR§761.79.

6. Replace the manway(s) and flanges on the tank so the tank can be easily reopened to allow inspection by UDSHW personnel.

7. After authorization by UDSHW personnel, replace the manway(s) and flanges of the tank.

8. Clean the exterior of the tanks, pumps and piping to a visibly clean standard, removing everything that appears waste-like. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

9. Clean the containment area. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

10. Sample the final rinse water from each sump and composite into one sample.

11. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

12. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

13. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB level specified in item 11 above are achieved.

14. If nitrogen is not going to be provided to the tanks:

    a. remove the activated carbon from the carbon adsorption system and dispose of as a hazardous waste and
    b. conduct an initial demonstration and then quarterly thereafter while the tanks are idled, confirming that the atmosphere within the tanks is not explosive.

<u>Unit 604 - Truck Wash</u>

1. Empty the tanks as much as possible through normal means to a tanker.

2. Flush all lines with clean water and blow the lines clear with nitrogen.

3. Remove all flexible hoses from the area and manage as specified on page 1 of this attachment.

4. Open the tanks and remove sludge from the bottom of the tanks.

5. Rinse the inside tank surfaces with clean water to remove gross contamination and remove this rinse from the tank (no large amount of contamination nor any liquid is to remain in the tank).

6. Replace the manway(s) and flanges on the tank so the tank can be easily reopened to allow inspection by UDSHW personnel.

7. After authorization by UDSHW personnel, replace the manway(s) and flanges of the tank.

8. Clean the exterior of the tanks, pumps and piping to a visibly clean standard, removing everything that appears waste-like.

9. Clean the containment area.

10. Sample the final rinse water from each sump in the truck wash bay and composite into one sample.

11. Sample the final rinse water from the sump in the East Bay.

12. Analyze the samples to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

13. Reclean and resample each bay, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 12 above are achieved.

Unit 991 - Primary Kiln and Cyclone

1. Operate on propane for at least two hours at operating temperatures after the last waste is fed.

2. Remove build-up from kiln, cyclone and duct work between the kiln and the SCC with refractory left in place. Specifically, no thick layers of ash/slag, large chucks of ash/slag or loose ash/slag shall remain inside the kiln ducts, or cyclone. The duct work should be clean and the cyclone have buildup removed so that no gross contamination remains.

3. After receiving authorization from the UDSHW, the PK and Cyclone will have all manways and openings sealed.

4. Install the blind flange at the outlet of the Primary Kiln.

5. Make sure kiln seals are clean and seated.

6. Clean from top down structure, rails, walkways and surfaces to remove any visible traces of waste. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

7. Clean external surfaces of the piston feeder area and insure all opening are sealed and weather tight.

8. Insure back-spill dump valves and conveyors are empty and clean external surfaces.

9. Clean the containment area.

10. Sample the final rinse water from cleaning the containment area under the PK.

11. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

12. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 11 above are achieved.

13. Obtain three wipe samples from the energetic feed line from the 991 instrument skid and two wipe samples from the exterior of the Primary Kiln burner. These samples must be taken in the areas where contamination would most likely be present (i.e. areas with stains or where leaks had previously been documented). In addition, replicate and blank samples will be taken. PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

14. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

15. Waste lances will be left in place and view ports will be sealed shut.

16. The area around the PK Cyclone and its structure will be cleaned of visible waste.

Unit 992 - Burner Kiln

1. Operate on propane for at least two hours at operating temperatures after the last waste is fed.

2. Remove build-up from kiln and duct work between the kiln and the SCC with refractory left in place. Specifically, no thick layers of ash/slag, large chucks of ash/slag or loose ash/slag shall remain in the kiln.

3. After obtaining authorization from UDSHW, all manways and openings on the kiln will be sealed and made weather tight.

4. Shut the damper out of the Burner Kiln.

5. Make sure kiln seals are clean and seated.

6. Clean from top down structure, rails, walkways and surfaces to remove any visible traces of waste. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

7. Clean external surfaces of the Komar Auger Unit and area and insure it is sealed and weather tight. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

8. Insure back spill system is empty and clean external surfaces.

9. Clean the containment area. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

10. Sample the final rinse water from cleaning the containment area under the BK.

11. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

12. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 11 above are achieved.

13. Obtain three wipe samples from the from the 992 instrument skid, two wipe samples from the exterior of the Burner Kiln burner, two wipe samples from the area adjacent to the sludge lance, and one wipe sample from each of the aqueous waste injection points. These samples must be taken in the areas where contamination would most likely be present (i.e. areas with stains or where leaks had previously been documented). In addition, obtain replicate and blank samples. PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

14. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

15. Waste lances will be left in place and view ports will be sealed shut.

16. Remove water from deslagger to be sent for incineration.

17. Remove sediment from deslagger.

18. Seal the deslagger discharge.

Unit 993 - Secondary Combustion Chamber (SCC)

1. Operate on propane at temperature for at least two hours at operating temperatures after the last waste is fed.

2. Clean out the SCC Residue Collection Chamber and Quench Chamber and duct work between the SCC and the Dry Scrubber. Leave refractory in place.

3. After receiving authorization from UDSHW, seal the SCC collection chamber to make it weather tight.

4. Clean from top down structure, rails, walkways and surfaces to remove any visible

traces of waste. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

5. Clean the SCC containment area. Sample stained areas (indicating spills) to assure cleanup to the less than or equal to 10 ug/100 cm^2 PCB cleanup standard.

6. Sample the final rinse water from the SCC containment area from each sump.

7. Analyze each sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

8. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 7 above are achieved.

9. Obtain three wipe samples from the 993 instrument skid and two wipe samples from the exterior of each of the SCC burners, and one wipe sample from each of the four aqueous lance ports on top of the SCC. These samples must be taken in the areas where contamination would most likely be present (i.e. areas with stains or where leaks had previously been documented). In addition, obtain replicate and blank samples. PCB wipe samples must be less than or equal to 10 ug/100 cm^2. If they are not, the areas not to that specification must be cleaned again and tested until the less than or equal to 10 ug/100 cm^2 standard is achieved.

10. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

11. Waste lances will be left in place and view ports will be sealed shut.

<u>Unit 994 - Waste Heat Boiler</u>

1. Clean area from top down and remove visible traces of contamination.

2. Remove ash accumulation from the boiler tubes and the ducts to and from the Waste Heat Boiler.

3. Empty conveyors from boiler to discharge into APCS residue collection system and then open the conveyors and remove any remaining material accumulated within.

4. Clean external surfaces of ducting, fans and motors and any residue from sump.

5. Clean the containment area.

6. Sample the final rinse water from the sump in the 994 area.

7. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

8. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 7 above are achieved.

9. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 996 - Dry Scrubber

1. Rinse atomizer feed lines with raw or process water during the clean fuel burning activity.

2. Clean duct work between the Dry Scrubber and the Baghouse.

3. Remove ash/slag from the Dry Scrubber.

4. Run live bottom, dump valves and conveyors dry to APCS residue collection system and then open the conveyors and remove remaining material accumulated within.

5. Flush caustic lines with raw water.

6. Clean platforms, stairs and rails of what may look like contamination.

7. Clean containment at same time as clean Unit 997 containment and obtain a sample of the final rinse solution.

8. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

9. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 8 above are achieved.

10. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 997 - Baghouse

1. Open each baghouse compartment and remove residue buildup in that compartment. Leave bags in place if they are clean and in good condition only.

2. Open baghouse hoppers and remove excess buildup in each compartment.

3. Run conveyor systems until they are dry, including the APCS residue collection conveyor that moves APCS residue to Unit 256 and then open the conveyors and remove remaining material accumulated within the enclosures.

4. Seal the baghouse hoppers so they may be easily opened for inspection by UDSHW.

5. After receiving authorization from UDSHW, close the manways to the baghouse hoppers tightly and shut the damper to the ID fan, disconnect the linkage on the thermal vent making sure the vent is down, making sure the baghouse, dry scrubber and boiler sections remain weather tight.

6. Clean walk ways, rails and other equipment from what may look like visible

contamination from all levels.

7. Clean external surfaces of ducting, conveyors, fans and motors and remove any residue from sump.

8. Clean the containment area.

9. Sample the final rinse water from the sump.

10. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

11. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 10 above are achieved.

12. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 998 - Wet Scrubbers

1. Wash the packing of the wet scrubbers.

2. Drain the wet scrubbers, remove sediment buildup, and rinse the internal reservoirs. Leave the packing in place. Obtain authorization from UDSHW to shut scrubbers.

3. Drain the blowdown tank, remove sediment buildup and rinse the tank.

4. Replace the slaked lime in slaked lime tanks with water, rinse and blow down all lines.

5. Drain caustic tank and rinse and blow down all caustic lines.

6. Remove drain plug from the stack to allow precipitation to drain.

7. Clean the containment area.

8. Sample the final rinse water from each of the sumps.

9. Analyze each sample according to Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

10. Steps 6, 7, 8, and 9 will continue until the results are below the levels stated in step 9.

Unit 254 - Ash Accumulation Building

1. Pulse baghouse bags to clean them and then empty baghouse hopper.

2. Run conveyors until no more residue comes out.

3. Seal exit of discharge chutes.

4. Clean residue from building walkways, platforms, conveyor surfaces, rails, etc., from top to bottom.

5. Clean the containment area.

6. Sample the final rinse water from the sump.

7. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

8. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 7 above are achieved.

9. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.

Unit 256 - APCS Ash Accumulation Building

1. Pulse baghouse bags to clean them and then empty baghouse hopper.

2. Run conveyors until no more residue comes out.

3. Seal exit of discharge chutes.

4. Clean residue from building walkways, platforms, conveyor surfaces, rails, etc., from top to bottom.

5. Clean the containment area.

6. Sample the final rinse water from cleaning the containment.

7. Analyze the sample to demonstrate the values are no more than those specified in Table I-1.3: Decontamination Washwater Analysis, in the closure plan (Attachment 8) and that the PCB concentration is less than .5 ppb.

8. Reclean and resample, as necessary, until the levels specified in Table I-1.3 and the PCB standard specified in item 7 above are achieved.

9. Each wipe/rinsate sample will be given a unique identification number. In addition, the location of each sample will be maintained as part of the operating record. The analytical results generated from each of the wipe/rinsate samples will be also be incorporated into the operating record, and will be identifiable by the sample identification number.