

## ATTACHMENT 1

### RESPONSE TO LIQUID IN THE LEACHATE COLLECTION SYSTEM

If liquid is discovered in any LCDRS standpipes, the operator detecting the presence of liquid, along with the operating foreman, and appropriate plant management, will evaluate the Surface Impoundment/Leachate Collection Inspection Log and the operator's assessment of the situation. After comparing the actual volume detected in the standpipe with the Decision Matrix for the Response Action Plan (included below), the appropriate response, as described below, will be performed.

All notifications to the agencies will be made by the environmental staff or as delegated by the Production Superintendent. Similarly, sampling and analysis of liquids in the LCDRS will be directed by the environmental staff or the Production Superintendent to determine the source of the liquid.

<b>Decision Matrix for Response Action Plan</b>		<b>PRIMARY LCDRS</b>		
		<b>&lt; 0.25 gpd</b>	<b>&gt; 0.25 gpd and &lt; 10 gpd</b>	<b>&gt; 10 gpd</b>
<b>SECONDARY LCDRS</b>	<b>&lt; 0.25 gpd</b>	<b>NORMAL OPERATIONS</b>	<b>1</b>	<b>2</b>
	<b>&gt; 0.25 gpd and &lt; 10 gpd</b>	<b>2</b>	<b>2</b>	<b>3</b>
	<b>&gt; 10 gpd</b>	<b>3</b>	<b>3</b>	<b>3</b>

### RESPONSE LEVEL 1

- A. If a boiler chemical cleaning is in progress, continue the cleaning operation and discharge the solutions into the pond.
- B. Increase the inspection frequency (and pumping frequency) to once per 8-hour shift until three consecutive 8-hour shifts are recorded at  $\leq 0.25$  gallons/shift.
- C. Follow the normal treatment procedures.
- D. If the liquid in the primary standpipe persists, contact DTSC and CCRWQCB and establish an appropriate course of action.
- E. Transfer contents of leaking pond to a non-leaking pond (if possible). If pond contents cannot be transferred to a non-leaking pond, immediately arrange for additional storage capacity.
- F. Inspect primary liner and repair as needed.

### RESPONSE LEVEL 2

- A. Contact DTSC and the CCRWQCB and establish an appropriate course of action.
- B. Increase the inspection frequency (and pumping frequency) to once per 8-hour shift until three consecutive 8-hour shifts are recorded at  $\leq 0.25$  gallons/shift.
- C. If a boiler chemical cleaning operation is in progress, continue the cleaning operation and discharge the solutions into the pond.
- D. Follow the normal treatment procedures before emptying the leaking pond.
- E. Inspect primary liner in applicable pond and repair as needed.

### RESPONSE LEVEL 3

- A. Notify DTSC and the CCRWQCB immediately and provide in writing an evaluation of the potential for unauthorized discharge from the pond per the Hazardous Waste Contingency Plan.
- B. Increase the inspection frequency (and pumping frequency) to once per 8-hour shift until three consecutive 8-hour shifts are recorded at  $\leq 0.25$  gallons/shift.
- C. Discontinue all discharges to the pond. If a boiler chemical cleaning is in progress, route all discharges to a non-leaking pond.
- D. Transfer contents of leaking pond to a non-leaking pond (if possible). If pond contents cannot be transferred to a non-leaking pond, immediately arrange for additional storage capacity.
- E. Take necessary precautionary measures to ensure no additional wastes are discharged to the pond.
- F. Inspect primary liner in applicable pond and repair as needed. Take action to determine integrity of secondary and tertiary liners, as necessary.