


**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**

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**Subject:** Division of Land Protection and Revitalization Guidance No. LPR-SW-SI-29  
**Submission Instruction No. 29: Additional Permit Application Requirements for Coal Combustion Residuals Units**

**To:** Regional Land Protection and Revitalization Program Managers

**From:** Justin Williams   
Director, Land Protection and Revitalization Division

**Date:** December 5, 2016

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**Summary:**

This guidance provides owners and operators of coal combustion residuals units (CCR) instructions regarding elements of permitting submissions to address CCR units particularly for new and existing CCR surface impoundments and landfills.

**Electronic Copy:**

An electronic copy of this guidance is available on the Virginia Regulatory Town Hall website at: <http://townhall.virginia.gov/L/GDocs.cfm?boardid=119>

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**Disclaimer:**

*This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any alternative method for the analysis of data, unless specifically required by the VSWMR. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.*

**SOLID WASTE PERMITTING  
SUBMISSION INSTRUCTION NO. 29**

**ADDITIONAL PERMIT APPLICATION REQUIREMENTS FOR  
COAL COMBUSTION RESIDUALS UNITS**

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Developed by:

**Virginia Department of Environmental Quality  
Office of Waste Permitting and Compliance  
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**V. 12/2016**

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## **I. APPLICABILITY**

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New and Existing coal combustion residual (CCR) landfills and New, Existing, and Inactive CCR surface impoundments have permitting requirements established pursuant to the incorporation of the EPA 2015 Final Rule on the “Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments” (EPA Final Rule) into the Virginia Solid Waste Management Regulations (VSWMR).

Aside from other permitting and standard elements that already existed for these units, new sections or requirements were added to the VSWMR including additional permitting elements for these facilities in [9 VAC 20-81-460](#), [475](#), and [810](#).

New CCR Landfills and Lateral Expansions will be required to comply with all applicable permitting requirements outlined for new landfills and lateral expansions in this Submission Instruction. Additional permit application requirements are outlined in [Submission Instruction 1](#). Applicants should submit the required permit application and obtain a permit for an industrial landfill prior to construction of the landfill area. The applicant is not authorized to place CCR in a constructed unit until the Department has issued a certificate to operate in accordance with the procedures outlined under [9 VAC 20-81-490](#).

Existing CCR Landfills that are continuing to operate by receiving CCR are required to submit permit applications to modify their permit by October 17, 2017. These applications will be to update permit conditions and permit documents and to demonstrate overall compliance with the EPA Final Rule. If the facility is not otherwise expanding at the time of application thus requiring a Part A application, the facility will only update those applicable requirements of the Part B permit, including, the groundwater monitoring plan, the closure plan, and the post-closure plan, and will address the requirements of 9 VAC 20-81-810.A. outlined in this Submission Instruction. These facilities already have permits meeting applicable VSWMR Part III standards. The permit modification issued will include additional permit conditions to ensure compliance with the EPA Final Rule. Permit modification requirements are outlined in [Submission Instruction 1](#).

New CCR Surface Impoundments and lateral expansions of Existing CCR Surface Impoundments will be subject to a Part A, consistent with “[Scenarios Under Which a Part A Amendment is or is Not Required](#)” to be addressed as new solid waste management facilities. This permitting action will include submission of a Part A application which will address the addition of 9 VAC 20-81-460.L. and a Part B application to address 9 VAC 20-81-475. In addition, these facilities should address those applicable requirements in [Submission Instruction 1](#) for Part A and Part B applications. This permit application will be due prior to initial receipt of CCR into the surface impoundment and permit approval is required prior to issuance of a certificate to operate for the impoundment.

Existing CCR Surface Impoundments are operating under the requirements of the EPA Final Rule, as incorporated in the VSWMR, in addition to requirements of their VPDES permit. Existing CCR Surface Impoundments are required to submit permit applications to address their operation, by October 17, 2017, and/or closure under the VSWMR. Permit applications for Existing CCR surface impoundments will include applicable Part B submittal requirements to address closure and post-closure care as outlined in [Submission Instruction 6](#) as well as documentation to address 9 VAC 20-81-475 and 9 VAC 20-81-810.B. to demonstrate compliance with the EPA Final Rule.

Inactive CCR Surface Impoundments should provide a Part B application to address closure and post-closure care as outlined in [Submission Instruction 6](#).

## **II. SUBMISSION REQUIREMENTS {9 VAC 20-81-460}**

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The Part A application for a New CCR surface impoundment or lateral expansion should include a “Hydrogeologic and Geotechnical Report” that will corroborate and support the location restriction demonstrations required by 40 CFR 257.60-64 and 40 CFR 257.3-1 through 3. Section IV.F. of [Submission Instruction I](#) provides the format and details regarding this report and should be followed.

## **III. SUBMISSION REQUIREMENTS {9 VAC 20-81-475}**

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In accordance with [9 VAC 20-81-475](#), Part B permit applications for New and Existing CCR surface impoundments should include the following:

### **A. Detailed Site Design Plan**

#### **1. {New CCR Surface Impoundments/Lateral Expansions}**

The Site Design Plan should consist of the following plans and assessments as applicable.

**{CCR Surface Impoundments that are either (1) at least five feet tall and have a storage volume of at least 20 acre-feet or (2) at least 20 feet tall}**

Provide a “Design and Construction Plan” addressing the requirements of 40 CFR 257.74(c)(1)(i) through (xi). This plan should be formatted following Section II of [Submission Instruction 2](#), except the Landfill Unit Design section (Section II.D.) should be replaced with a section documenting the proposed surface impoundment liner design and its compliance with 40 CFR 257.72. All other required information outlined under 257.74(c)(1) should also be inserted in the Plan where appropriate. Note that 40 CFR 257.74(c)(1)(vii) requires submittal of design plans which can be formatted following Section I of Submission Instruction 2 and 40 CFR 257.74(c)(1)(xi) requires submittal of construction specifications which can be formatted following Sections III and IV of Submission Instruction 2.

The “Structural Stability Assessment” required by 40 CFR 257.74(d) and “Safety Factor Assessment” required by 40 CFR 257.74(e) for the proposed impoundment/lateral expansion should be provided as separate attachments to the Design and Construction Plan. For Non-incised Units, the “Periodic Hazard Potential Classification Assessment” required by 40 CFR 257.74(a)(2) should also be provided as an attachment.

**{All other New CCR Surface Impoundments/Lateral Expansions}**

Provide a Design Report, Design Plans, Construction Quality Assurance Plan, and Technical Specifications following the format of [Submission Instruction 2](#) as applicable, except the Landfill Unit Design section (Section II.D.) should be replaced with a section documenting the proposed surface impoundment liner design and its compliance with 40 CFR 257.72. For Non-incised Units, the “Periodic Hazard Potential Classification Assessment” required by 40 CFR 257.74(a)(2) should also be provided as an attachment to the Design Report.

2. **{Existing CCR Surface Impoundments}**

Provide the liner demonstration documentation required by 40 CFR 257.71.

**{All Non-incised Units}**

Include the initial or current “Periodic Hazard Potential Classification Assessment” required by 40 CFR 257.73(a)(2).

**{CCR Surface Impoundments that are either (1) at least five feet tall and have a storage volume of at least 20 acre-feet or (2) at least twenty feet tall}**

- Include the initial or current “History of Design and Construction” required by 40 CFR 257.73(c).
- Include the initial or current “Structural Stability Assessment” required by 40 CFR 257.73(d).
- Include the initial or current “Safety Factor Assessment” required by 40 CFR 257.73(e).

**B. Operating Plan**

The Operating Plan should consist of the following plans.

1. *Air Criteria*

Include a current copy of the “Fugitive Dust Control Plan” required by 40 CFR 257.80.

2. *Hydrologic and Hydraulic Capacity Requirements*

Include a current copy of the “Inflow Design Flood Control System Plan” required by 40 CFR 257.82.

3. *Inspections*

Include an outline of inspection requirements implemented or to be implemented at the facility as required by 40 CFR 257.83. This outline should include:

- i. Identified Qualified Person or securing of qualified person.
- ii. Schedule of inspections including initial date for establishing the intervals of inspections.
- iii. Identification of outlets to be inspected.
- iv. Identification of CCR unit instrumentation to be inspected.
- v. Availability of inspection records in the facility operating record.
- vi. Statement whether the unit is subject to the Annual Inspection requirement under 257.83(b).
- vii. Statement that a qualified professional engineer will conduct the Annual inspections.
- viii. Statement that all available information will be provided to the qualified professional engineer.
- ix. Statement that qualified professional engineer will visually inspect all required elements of the unit.
- x. Example of a blank weekly inspection record and Annual Inspection Report if developed.

#### C. Groundwater Monitoring Plan

Include a Groundwater Monitoring Plan as an attachment to the Permit Application that includes the requirements of the EPA Final Rule.

#### D. Closure and Post-Closure Plan

Include a Closure, and as applicable to the CCR Surface Impoundment, a Post-Closure Plan in accordance with [Submission Instruction 6](#).

### IV. SUBMISSION REQUIREMENTS {9 VAC 20-81-810}

[9 VAC 20-81-810](#) ensures that the facility is demonstrating compliance with the EPA Final Rule throughout the permitting action as the final permit will require compliance with all applicable provisions. The required descriptions and explanations are outlined in the following subsections to ensure key applicable elements of the EPA Final Rule are met.

**Format:** Facilities should include the requirements addressing 9 VAC 20-81-810 in a Part B Permit Attachment titled “Documentation/Reports specific to CCR Facilities to satisfy 9 VAC 20-81-810.” Example language addressing these requirements is provided below and should be revised as necessary. In the Attachment, facilities should identify each section for clarity of reference.

#### A. New CRR Landfills/Existing Landfills/Lateral Expansions

##### 1. Location Restrictions

{New CCR Landfills/Lateral Expansions}

Submit the location restriction demonstrations required by 40 CFR 257.60-64 at the time of submission of the Part A for the facility or include in the permit application a statement that the location restriction demonstrations will be made prior to construction of any new cell or phase of new cell construction. [9 VAC 20-81-810.A.1]. Location Restriction demonstrations submitted with the Part A application should be provided in a stand-alone PTA Attachment. Those applicants of new landfills which include a statement will have a permit condition added to their permit reflecting this requirement for all new cells and any lateral expansions.

Examples:

**Location Restrictions**

Option 1: Location Restriction Demonstrations required by 40 CFR 257.60-64 have been completed, submitted to the Director and are available on the publicly accessible internet site and are included within this application or were addressed with the Part A permit application. The impoundment meets all of the location restriction requirements.

Option 2: The Location Restriction Demonstrations will be made prior to construction of any new cell or phase of new cell construction.

{Existing CCR Landfills}

Location Restriction demonstrations are not required for Existing CCR Landfills by the time of the required deadline for submission of a permit application unless the facility is expanding separately in a permitting action. Those facilities may include the demonstrations if completed. Alternatively, those facilities may include a statement that compliance will be achieved in accordance with the required deadlines. Those facilities which include a statement will have a permit condition added to their permit reflecting this requirement.

Examples:

**Location Restrictions**

Option 1: Location Restriction Demonstrations will be completed and placed in the facility's operating record by October 17, 2018 as required by 40 CFR 257.60-64. Notification to the Director and posting to the publicly accessible internet site will occur within 30 days of placing the demonstrations in the operating record.

Option 2: The Location Restriction Demonstrations have been completed are included within this application (and/or) available on the facility's publicly accessible internet website.

**2. Description of Design Criteria**

{New CCR Landfills and Lateral Expansions only}



Include a narrative description of the design criteria. [9 VAC 20-81-810.A.2.]. For the liner design criteria, this can be addressed through a reference to the description provided in the Landfill Design Report. See Section II.D. of [Submission Instruction 2](#).

*Example:*

**Design Criteria**

A Liner Design Certification pursuant to 40 CFR 257.71(e) has been completed and is included within the design plans of the facility and this application. The proposed landfill/lateral expansion will be lined with (describe liner system and reference other permit application plans as necessary).

**3. Operating Criteria**

A general statement of measures to address airborne emissions, flow into and from the CCR Unit, and structural stability may be included as an overview. Overall, operating criteria required by 40 CFR 257.80, 81, and 84 are met through implementation of required plans and inspections.

**{New CCR Landfills, Existing CCR Landfills, and Lateral Expansions}**

- a. Include a description of how the required “Fugitive Dust Control Plan” required by 40 CFR 257.80 will be developed and included with the facility’s operations manual or a description of reference to an existing “Fugitive Dust Control Plan” that has been developed and is available in the facility’s operating record and the facility’s publicly accessible internet website.

*Example:*

**Fugitive Dust Control**

A fugitive dust control plan pursuant to 40 CFR 257.80 was developed and the current plan is included in the facility’s operating record and is available on the publicly accessible internet site. This plan includes procedures to emplace CCR as conditioned CCR.

- b. Include a description of the designed or constructed run-on and run-off controls required by 40 CFR 257.81. For this requirement, a reference to the “Run-on and Run-Off Control Systems Plan” found in the Design Report previously provided to the Department would be sufficient (See Section II.E. of [Submission Instruction 2](#)), a statement regarding general control measures used, or a reference to an existing “Run-on and Run-Off Control System Plan.”

*Example:*

**Run-on and Run-off Controls**

Run-on and run-off controls are addressed in Section (insert alphanumeric designation) of the Design Report, in a stand-alone Run-on and Run-off Control System Plan provided in this application, or available on the facility’s public accessible internet website.

- c. Include a description of how the “Inspection Requirements” required by 40 CFR 257.84 will be developed and included or are already included with the facility’s inspection plan as part of the facility’s operations manual.

Examples:

**Inspection Requirements**

**{New CCR Landfills}** The facility will begin weekly inspections of the landfill upon initial receipt of CCR and a qualified person will be retained and trained pursuant to 40 CFR 257.84. The facility will complete the initial annual inspection by a professional engineer no later than 14 months following the date of initial receipt of CCR in the CCR unit. Weekly and Annual Inspection Reports will be developed.

**{Existing CCR Landfills and Lateral Expansions}** The facility has (insert number) available qualified persons to conduct weekly inspections pursuant to 40 CFR 257.84(a). Inspections began on (insert date) and occur at intervals not exceeding seven days. These inspections include (list items inspected to meet the 257.84(a)(1)(i) requirement). Inspection records will be maintained in the facility’s operating record for five years.

This landfill is also subject to Annual Inspections and a professional engineer will conduct this inspection or conducted the first inspection which is available on the publicly accessible internet site. The professional engineer is provided all necessary documentation and is able to visually inspect the unit and record the changes in geometry, structural weakness and other changes.

#### 4. **Groundwater Monitoring and Corrective Action**

**{New CCR Landfills, Existing CCR Landfills, and Lateral Expansions}**

Include an explanation of how the groundwater monitoring and corrective action criteria are met. The permit application may include a reference to the included groundwater monitoring plan and highlight those elements which demonstrate compliance or may include a statement indicating compliance with items addressing elements not included in the groundwater monitoring plan such as corrective action requirements outlined in the EPA Final Rule.

Examples:

**Groundwater Monitoring/Corrective Action**

**{New/Existing CCR Landfills (first submission)}** A groundwater monitoring plan is included within this application. (Highlight items that were included, e.g. [t]he plan includes monitoring for both Appendix III and Appendix IV constituents, the required process for establishing groundwater protection standards according to background or MCLs, and the required action in event of a groundwater exceedance.)

**{Existing CCR Landfills/Lateral Expansions (subsequent submission)}** A groundwater monitoring plan was previously developed for this facility and is included as an attachment to the existing permit. (Highlight items that were included, e.g. The plan has been updated to include monitoring for both Appendix III and Appendix IV constituents, the required process for establishing groundwater protection standards according to background or MCLs, and the required action in event of a groundwater exceedance.)

## 5. Closure and Post-Closure

**{New CCR Landfills, Existing CCR Landfills, and Lateral Expansions}**

The permit application may include a reference to the included closure and post-closure plan and highlight those elements which demonstrate compliance. If a closure or post-closure plan is not included, an explanation of revisions made to the plans to meet these requirements should be included. Requirements for Closure and Post-Closure Care Plans are identified in [Submission Instruction 6](#).

*Examples:*

### **Closure/Post-Closure**

**{New/Existing CCR Landfills (first submission)}** A closure plan and post-closure plan is included within this application. (Highlight items that were included, e.g. These plans include proper cap design, maintenance and a required 30 year post-closure care period.)

**{Existing CCR Landfills/Lateral Expansions (subsequent submission)}** A closure plan and post-closure plan were previously developed for this facility and included as an attachment to the existing permit. (Highlight items that were included, e.g. These plans have been updated to include proper cap design, maintenance and a required 30 year post-closure care period).

## 6. Website Address

**{New CCR Landfills, Existing CCR Landfills, and Lateral Expansions}**

The Permit Attachment should include the website address for the “Publicly Accessible Internet” site.

*Example:*

### **Website**

The facility maintains a publicly accessible Internet site (insert web address) where required documents are posted including documents that have been placed in the operating record and submitted to the Director.

## B. New CCR Surface Impoundments/Existing CCR Surface Impoundments/Lateral Expansions

### 1. Location Restrictions

#### {New CCR Surface Impoundments/Lateral Expansions}

Submit the location restriction demonstrations required by 40 CFR 257.60-64 at the time of submission of the Part A application for the facility or include in the permit application a statement that the location restriction demonstrations will be made prior to receipt of CCR into the Surface Impoundment. Location Restrictions demonstrations submitted with the Part A application should be identified in a stand-alone PTA Attachment. Those applicants of new CCR Surface Impoundments/Lateral Expansions which include a statement will have a permit condition added to their permit reflecting this requirement for all new cells and any lateral expansions.

#### Examples:

##### **Location Restrictions**

Option 1: Location Restriction Demonstrations required by 40 CFR 257.60-64 have been completed, submitted to the Director and are available on the publicly accessible internet site and are included within this application or were addressed with the Part A permit application. The impoundment meets all of the location restriction requirements.

Option 2: The Location Restriction Demonstrations will be made prior to construction of any new surface impoundment or lateral expansion construction.

#### {Existing CCR Surface Impoundments}

Location Restriction demonstrations are not required for Existing CCR Surface Impoundments by the time of the required deadline for submission of a permit application. Those facilities may include a reference to those demonstrations if completed. Alternatively, those facilities may include a statement that compliance will be achieved in accordance with the required deadlines. Those facilities which include a statement will have a permit condition added to their permit reflecting completion of this requirement.

#### Examples:

##### **Location Restrictions**

Option 1: Location Restriction Demonstrations will be completed and placed in the facility's operating record by October 17, 2018 as required by 40 CFR 257.60-64. Notification to the Director and posting to the publicly accessible internet site will occur as well within 30 days of placing the demonstrations in the operating record.

Option 2: The Location Restriction Demonstrations have been completed and are included in this application (and/or) available on the facility's publicly available internet website.

## 2. Description of Design Criteria

A general statement outlining the design elements and requirements may be included.

### {New CCR Surface Impoundments and Lateral Expansions}

Include a narrative description of the design criteria. For the liner design criteria, this can be addressed through a reference to or restatement of the description provided in the Detailed Site Design Plan.

### {Existing CCR Surface Impoundments}

Include a statement that the liner demonstration has been completed. This may also indicate whether the liner design criteria are met for the Existing CCR Surface Impoundment, and provide a description of any in-place liner if lined. This may be addressed through a reference to an available liner demonstration included in the application or on the facility's publicly accessible internet website.

### {All CCR Surface Impoundments}

Include a description of the "Periodic Hazard Potential Classification Assessment" or statement of reference to an available "Periodic Hazard Potential Classification Assessment" and installation of marker for the surface impoundment. This may also include a statement regarding the hazard classification.

### {For High hazard/Significant Hazard CCR Surface Impoundments}

Include a description of the "Emergency Action Plan" or statement of reference to an available "Emergency Action Plan," on the facility's publicly accessible internet website or if not yet required, a statement that compliance with this item will be achieved.

### {All CCR Surface Impoundments that are either (1) at least five feet tall and have a storage volume of at least 20 acre-feet or (2) at least twenty feet tall}

Include a description of or a statement of reference to the available "Design and Construction Plans" (new/lateral expansion) or "History of Construction" (existing), "Periodic Structural Stability Assessment," and "Periodic Safety Factor Assessment" included in the application or on the facility's publicly accessible internet website. This may include statements regarding the included elements or results of these requirements.

### Examples:

#### **Design Criteria**

{New CCR Surface Impoundment/Lateral Expansion} A Liner Design Certification pursuant to 40 CFR 257.72(c) has been completed and is included within the design plans of the facility and this application. The proposed surface impoundment/lateral expansion will be lined with (describe liner system and reference other permit application plans as necessary).

**{Existing CCR Surface Impoundment}** A Liner Demonstration has been completed and is included within this application (and/or) available on the facility's publicly accessible internet website. The impoundment (does/does not) meet the liner requirements of 40 CFR 257.71(a). **{If met}** The impoundment is lined with (describe liner system and reference other permit application plans as applicable).

**{New/Lateral Expansion/Existing}** A "Periodic Hazard Potential Classification Assessment" has been completed and is included within this application (and/or) available on the facility's publicly accessible website. The impoundment is a (high, significant, or low) hazard potential surface impoundment. A sign has been installed at the surface impoundment. **{If deemed a High hazard/Significant Hazard CCR Surface Impoundments}** An Emergency Action Plan has been developed and is available on the facility's publicly accessible website. **{Alternative for Existing}** An Emergency Action Plan will be developed and will be completed and placed in the facility's operating record by April 17, 2017 as required by 40 CFR 257.73.

**{New/Lateral Expansion}** A "Design and Construction Plan" has been included with this application.

**{Existing}** A "History of Construction" has been completed and is included within this application (and/or) available on the facility's publicly accessible website. This document outlines available information regarding the design and construction of the impoundment including available descriptions of (identify elements of information e.g. engineering properties).

**{New/Lateral Expansion/Existing}** A "Periodic Structural Stability Assessment" has been completed and is included within this application (and/or) available on the facility's publicly accessible internet website. **{For Existing/Lateral Expansion}** No deficiency or release was identified or corrective measures are being undertaken and documented.

A "Periodic Safety Factor Assessment" has been completed and is included within this application (and/or) available on the facility's publicly accessible website. All factors of safety (have/have not) been met.

### 3. Description of Operating Criteria

**{New CCR Surface Impoundments, Existing CCR Surface Impoundments, and Lateral Expansions}**

- a. Include a description of how the "Fugitive Dust Control Plan" required by 40 CFR 257.80 will be developed or a statement of reference to an available "Fugitive Dust Control Plan."

Example:

***Fugitive Dust***

A fugitive dust control plan pursuant to 40 CFR 257.80 was developed and the current plan is included within this application (and/or) available on the facility's publicly available internet website.

- b. Include a description of how the required "Inflow Design Flood Control System Plan" required by 40 CFR 257.82 will be developed or a statement of reference to an available "Inflow Design Control System Plan."

Example:

***Inflow Design Flood Control***

An Inflow design flood control system plan pursuant to 40 CFR .82 was developed and is included within this application (and/or) available on the facility's publicly accessible internet website.

- c. Include a description of how the "Inspection Requirements" required by 40 CFR 257.83 will be developed or are already implemented at the facility. This description should include any completed "Annual Inspection Report" or a statement of reference to an available "Annual Inspection Report."

Examples:

***Inspection Requirements***

{New} The facility will begin weekly inspections of the impoundment and qualified person will be retained and trained pursuant to 40 CFR 257.83. The facility will complete the initial annual inspection by a professional engineer no later than 14 months following the date of initial receipt of CCR in the CCR unit. Weekly and Annual Inspection Reports will be developed.

{Lateral Expansions/Existing} The facility has (insert number) available qualified person to conduct weekly inspections pursuant to 40 CFR 257.83. Inspections began (insert date). Inspection records are maintained in the facility's operating record for five years.

This impoundment is also subject to Annual Inspections and a professional engineer (will conduct this inspection or conducted the first inspection on (insert date) and the report is available on the publicly accessible internet site). The professional engineer is provided all necessary documentation and is able to visually inspect the unit and record the changes in geometry, instruments, and depths of the impoundment.

**4. Explanation of Groundwater Monitoring and Corrective Action**

***{New CCR Surface Impoundments, Existing CCR Surface Impoundments, and Lateral Expansions}***

Include an explanation of how the groundwater monitoring and corrective action criteria are met. The permit application may include a reference to the included groundwater monitoring plan and may highlight those elements which

demonstrate compliance with these requirement e.g. inclusion of required constituents or may include a statement indicating compliance with elements not yet required included in the groundwater monitoring plan such as corrective action requirements outlined in the EPA Final Rule.

*Examples:*

Option 1:

{New/Existing} A groundwater monitoring plan is included within this application. (Highlight items that were included, e.g. [t]he plan includes monitoring for both Appendix III and Appendix IV constituents, the required process for establishing groundwater protection standards according to background or MCLs, and the required action in event of a groundwater exceedance.)

Option 2:

{Lateral Expansions if updated GMP already provided} A groundwater monitoring plan has previously been developed for this facility in the existing permit. (Highlight items that were included, e.g. [t]he plan was updated to include monitoring for both Appendix III and Appendix IV constituents, the required process for establishing groundwater protection standards according to background or MCLs, and the required action in event of a groundwater exceedance.)

## 5. Explanation of Closure and Post-Closure

{New CCR Surface Impoundments, Existing CCR Surface Impoundments, and Lateral Expansions}

The permit application may include a reference to the included closure and post-closure plan and may highlight those elements which demonstrate compliance with these requirements (e.g. 30 years of Post-Closure Care). If a closure or post-closure plan is not included, an explanation of revisions made or to be made to the plans to meet these requirements should be included. Requirements for Closure and Post-Closure Care Plans are identified in [Submission Instruction 6](#).

*Examples:*

Option 1: A closure plan and post-closure plan is included within this application. (Highlight items that were included, e.g. [t]hese plans include proper cap design, maintenance and a required 30 year post-closure care period.)

Option 2: A closure plan and post-closure has previously been developed for this facility in the existing permit. (Highlight items that were included, e.g. [t]hese plans include proper cap design, maintenance and a required 30 year post-closure care period.)

## 6. Website Address

{New CCR Surface Impoundments, Existing CCR Surface Impoundments, and Lateral Expansions}



The Permit Attachment should include the website address for the “Publicly Accessible Internet” site.

*Example:*

The facility maintains a publicly accessible Internet site (insert web address) where required documents are posted including documents that have been placed in the operating record and submitted to the Director.