ATTACHMENT 1C.4.6

Solid Waste Units, Notice of Registration
Plant Site Assessment Areas

ARCADIS

Solid Waste Units, Notice of Registration
Plant Site Assessment Areas

Introduction

As described on page 6 in Worksheet 1.0 of the Response Action Plan (RAP), the Response Actions for the site include closure of the active waste codes and waste management units listed on the ASARCO Notice of Registration (NOR). Thirty-five active or inactive waste units are present in the NOR with 21 units having hazardous waste codes associated with them as illustrated on Figure 14 of the RAP (Arcadis 2016e). Waste units will be closed as part of the response action for the Site.

Notice of Registration Units Closure Report, Former ASARCO Smelter Site, Solid Waste Registration No. 31235 Notice of Registration Unit Nos. 1 through 35 TCEQ Region 6 (Malcolm Pirnie 2015, included as RAP Appendix 3.5 (Arcadis 2016e) provides a summary of closure activities regarding the NOR units. Although text in the RAP (Arcadis 2016e) noted that all but eight of the NOR waste units are within the footprint of the cover system for the plant site and text in the NOR Closure Report (Malcolm Pirnie 2015, included as RAP Appendix 3.5 (Arcadis 2016e)) indicated that all but five NOR units are within the footprint of the cover system, comparison of Figure 2-1 of the NOR Closure Report and Figure 1A-4 and Figure 1A-5 in Attachment 1A of this 2016 Soil RACR shows that a total of seven units (012, 019, 021, 022, 024, 028, and 032) will not be beneath the cover system and require characterization.

The NOR waste units are described in the following sections of the RAP:

- RAP Worksheet 1.0, page 6 – describes response action objectives to close WMUs
- RAP Worksheet 1.0, page 15 – describes closing of NOR units
- RAP Worksheet 1.0, page 38 – notes Waste Accumulation Areas
- RAP Worksheet 2.0, page 7 – notes soil potentially affected by four former waste units
- RAP Appendix 3.5 – Notice of Registration Units Closure Report

Completion of closure of waste units will coincide with completion of the response action. The final closure documentation for the NOR units will be submitted following closure of units 19 and 24 in the 2017 Soil RACR. Once the approval letter for closure of the NOR units is received from the TCEQ, the NOR will be updated to show all the units as closed and the waste streams as inactive.

Response Actions

The following seven waste units require characterization: 012, 019, 021, 022, 024, 028, and 032 (**Figure 1 of this attachment**). The characterization and closure of unit 012 is described in the NOR Closure Report (Malcolm Pirnie 2015 included as RAP Appendix 3.5 (Arcadis 2016e)). In addition, Unit 12 was located within the Storage Yard where soil was excavated and confirmation sampling performed (see Section 1C.5).

In late 2016 TCT collected concrete chip confirmation samples from the other six NOR units, 019, 021, 022, 024, 028, and 032. Locations are shown on Figure 2-1 of the NOR Closure Report (Malcolm Pirnie 2015 included as RAP Appendix 3.5 (Arcadis 2016e)). Analytical results are shown in **Table 1** in this attachment.

At Unit 021, a concrete chip sample was collected from the former laboratory building slab and analyzed for metals, VOCs, and SVOCs. All metals and two VOC/SVOC compounds were detected at concentrations below the critical C/I PCLs. Because the analytical results are less than the C/I PCL, no action is required to close NOR Unit 021.

At Unit 022, a concrete chip sample was collected from the former container storage area/satellite accumulation area slab and analyzed for metals per Table 2-1 of the NOR Closure Report (Malcolm Pirnie 2015). All metals were detected at concentrations below C/I PCLs. Because the analytical results are less than the C/I PCL, no action is required to close NOR Unit 022.

At Unit 028, described as a drum with an aerosol can crusher, a concrete chip sample was collected from the former building slab and analyzed for VOCs per Table 2-1 of the NOR Closure Report. No VOCs were detected at concentrations above the detection limits. Because the analytical results are less than the C/I PCL, no action is required to close NOR Unit 028.

At Unit 032, described as a 5-gallon plastic pail at the instrument shop, a concrete chip sample was collected from the former building slab and analyzed for VOCs and SVOCs per Table 2-1 of the NOR Closure Report. Although 18 compounds were detected, all detections were below the C/I PCL. Because the analytical results are less than the C/I PCL, no action is required to close NOR Unit 032.

At Units 019 (Container Storage Area Security Bunker Building) and Unit 024 (Container Storage Area/Satellite Accumulation Area Units, laboratory analytical results for concrete samples include C/I PCL exceedances for antimony, arsenic, and/or cadmium. In 2017 TCT will conduct additional cleaning and/or concrete removal at these units, along with confirmation sampling to verify waste removal has been performed to the C/I standards to meet the performance objective requirement. Confirmation sampling results will be presented in an Addendum to the NOR Closure Report. Activities performed in 2017 will be documented in the 2017 Soil RACR.

Supporting Documentation Included in This Attachment

- Table 1 Analytical Results for NOR Units
- Figure 1 NOR Unit Locations (adapted from Figure 4-1 in the NOR Closure Report (Malcolm Pirnie 2015, included as RAP Appendix 3.5 (Arcadis 2016e))