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E. GROUNDWATER MONITORING

E.1 Applicability

CS Clean Solutions, Inc. (CS Clean) has conducted a review of groundwater monitoring requirements as it pertains to the management and treatment of spent columns containing waste granulate in containers onsite. The Code of Federal Regulations (CFR), 40 CFR 264.90(a), was reviewed to determine applicability.

Per 40 CFR 264.90(a)(1) CS Clean's operations of managing waste in containers which are located inside the site building: the waste storage area, preparation area, waste material transfer room, shipping and receiving, and the don and doff passthrough area. This would meet the definition of solid waste management units.

As noted in **Section D.1** of this permit, CS Clean does not manage, treat, or dispose of wastes onsite in qualifying "regulated units" as defined by 40 CR 264.90(a)(2) (i.e., surface impoundments, waste piles, land treatment units, or landfills).

All solid waste management units must comply with the requirements in 40 CFR 264.101 as noted in **Section E.3**.

E.2 Exemption

CS Clean solid waste management units are exempt from groundwater monitoring requirements as CS Clean manages all hazardous waste in containers inside of the site building, as described in **Section D.1**. CS Clean does not have "regulated units" onsite which would require groundwater monitoring per 40 CFR 264.90(a)(2).

E.3 Corrective Actions

CS Clean will manage the facility and waste, as described in this permit application, in such a manner to protect human health and the environment from releases of hazardous waste. CS Clean will implement corrective actions, respond to releases, or emergencies per the contingency plan in **Section G** and will develop a compliance schedule to respond to any permit or compliance issues identified. CS Clean maintains financial responsibility and assurances as detailed in **Section I**.

