# ATTACHMENT G - CLOSURE PLAN

# CLOSURE PLAN

## HERITAGE ENVIRONMENTAL SERVICES, LLC
## 284 EAST STOREY ROAD
## COOLIDGE, ARIZONA 85128

## AZD 081 705 402

## TABLE OF CONTENTS

## LIST OF APPENDICES



## LIST OF TABLES



## LIST OF FIGURES

## 1. INTRODUCTION

Heritage Environmental Services, LLC ("Heritage") operates a commercial hazardous waste management facility at 284 East Storey Road, Coolidge, Arizona. Heritage has prepared this Closure Plan, including closure cost estimate, in accordance with 40 CFR Part 264, Subpart G.

This Closure Plan will be implemented in the event that final closure of the entire facility becomes necessary. In the event that closure of individual units or areas of the facility becomes necessary, Heritage will implement those provisions of this Closure Plan that are applicable to the unit(s) being closed. Such partial closures may be necessary due to decommissioning of unused equipment, changes in regulatory requirements, modifications of operations, or replacement of permitted units or portions of permitted units during the operating life of the facility. Partial closure of a portion of a hazardous waste management unit would proceed in the same manner described herein for final closure of the entire facility, with respect to removal of inventory and residues, decontamination of equipment and structures, and verification sampling and analysis. The closure activities discussed herein are intended to achieve clean closure of the facility or the unit(s) being closed.

This Closure Plan describes the following aspects of closure:

1. Partial closures;
2. Notification of final closure;
3. Closure schedule;
4. Estimate of maximum inventory at closure;
5. Description of closure activities;
6. Verification sampling and analysis; and,
7. Closure cost estimate.

The following sections of this Closure Plan describe each of these points in detail.

## 2. FACILITY DESCRIPTION

The Heritage facility in Coolidge, Arizona is a commercial hazardous waste management facility (Standard Industrial Classification 4953/NAICS 562211). The Coolidge facility is located 60 miles south of Phoenix in Pinal County on approximately 80 acres. More specifically, it is located about 1.5 miles south of unincorporated Randolph and 4.5 miles south of the City of Coolidge. A site location map is presented as Figure G-1.

Heritage is permitted to manage RCRA hazardous waste from a wide variety of off-site sources, including but not limited to manufacturing facilities, remediation sites, off-site waste treatment and storage facilities, spill response contractors, and transporters. In general, hazardous wastes managed at the Heritage-Coolidge facility include: solids, liquids, and sludges; contaminated soils and debris; organic wastestreams such as inks, paints, solvents, and other hydrocarbons; contaminated waters and leachate; lab packs; and treatment residues from off-site waste treatment and storage facilities. The specific hazard codes Heritage is permitted to manage are listed in the Coolidge facility's RCRA permit. Heritage is permitted to store 84,601 gallons of hazardous waste and 100 cubic yards of hazardous waste without free liquids in designated areas of the facility.

### 2.1. Container Storage Areas

The permitted waste activities currently conducted at the Coolidge facility are storage in containers, fuel blending, and consolidation of wastes into larger containers, including solids (filter cake) blending. Heritage stores hazardous waste in a variety of container types at the Coolidge facility. Wastes are stored in several different container storage areas. The container storage areas are located throughout the facility. A facility site plan is included as Figure G-2.

### 2.2. Facility Staging Activities

Heritage manages containers in certain areas of the facility that are not located in permitted storage units. These areas include a ten day transfer area and a loading/unloading area for containerized wastes. These areas are not permitted for storage of hazardous waste and are not designated on the Part A Application. They are identified as staging and loading/unloading areas that were designated by the ADEQ as SWMU's for the purpose of this closure plan. They are included in the closure plan for the purpose of complying with any future corrective action requirements for the facility. Implementation of the closure requirements for these areas will satisfy any future requirements for corrective action under RCRA for the facility.

### 2.3. Onsite Septic System

Heritage operates an onsite septic system at the facility. Closure activities associated with the septic system, including sampling and analysis, are included in this Closure Plan, as directed by the ADEQ.

## 2.4 Wastes Accumulated at the Facility

Detailed lists of hazardous wastes managed in the permitted units at the Heritage facility, including chemical descriptions and US EPA hazardous waste codes, are included in the facility's RCRA Part B permit.

**FIGURE G-1**

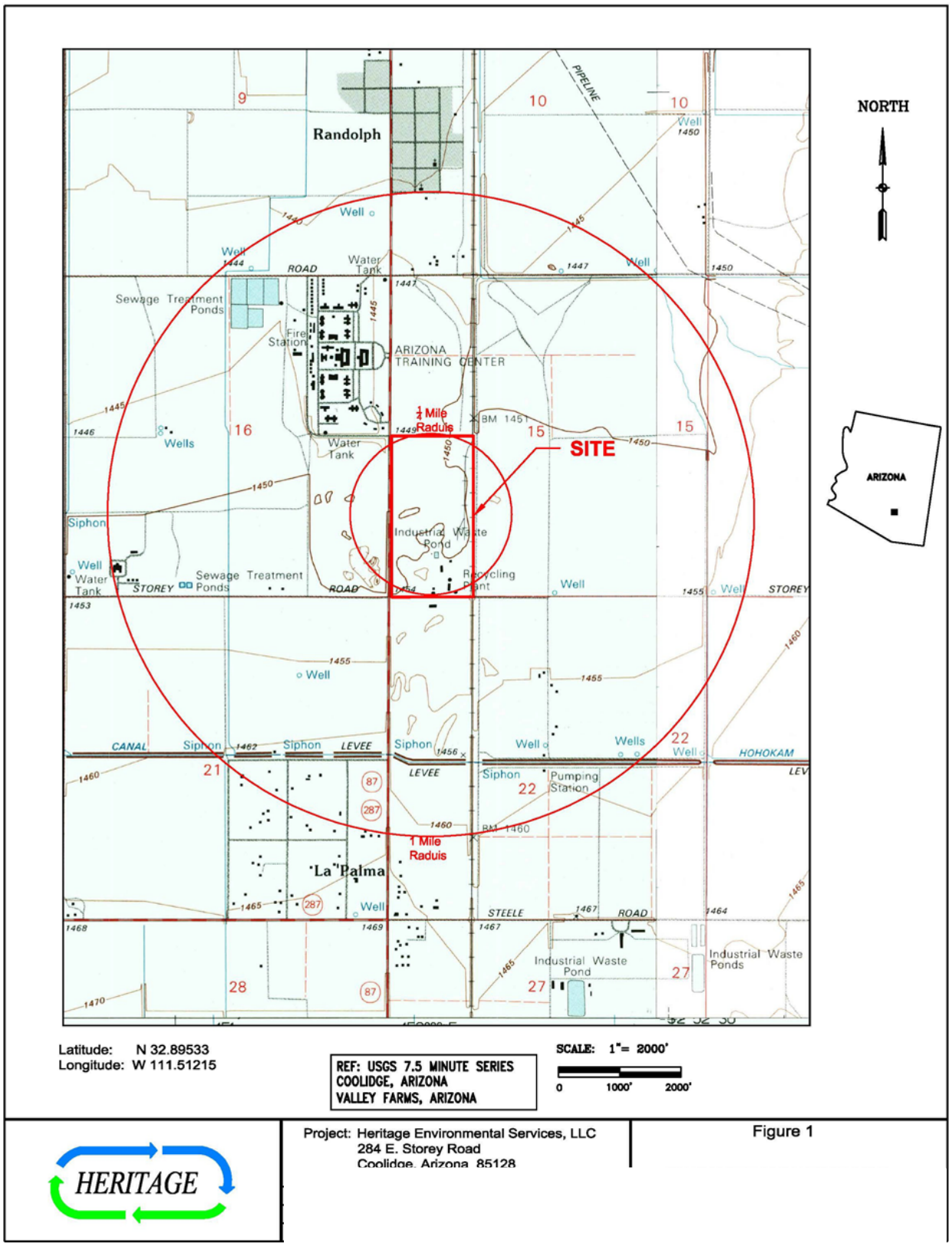
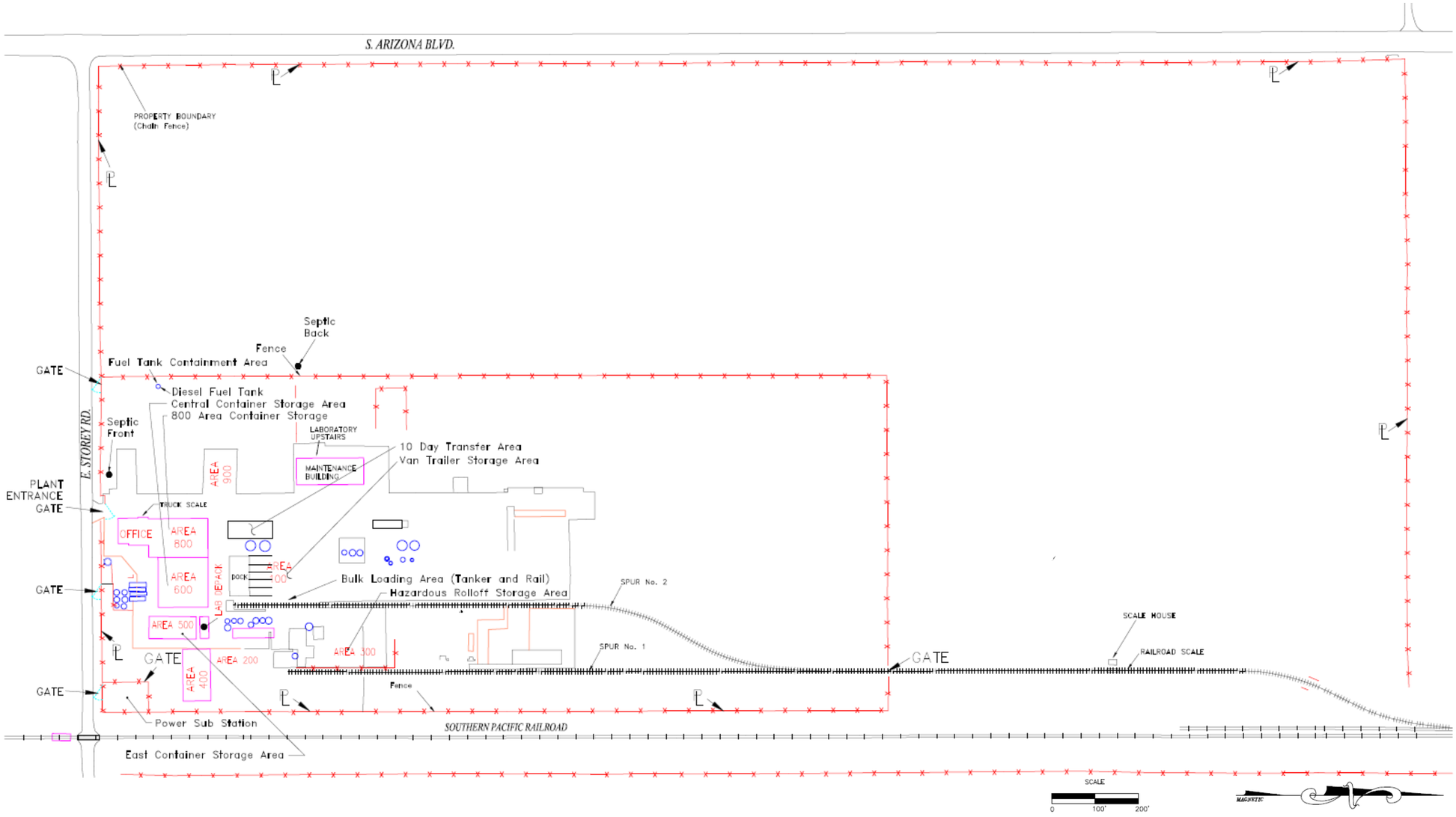

NORTH
ARIZONA
SITE
½ Mile Raduis
1 Mile Raduis
Randolph
La Palma
ARIZONA TRAINING CENTER
Sewage Treatment Ponds
Industrial Waste Pond
Recycling Plant
Pumping Station
Industrial Waste Ponds
Water Tank
Fire Station
Wells
Siphon
CANAL
LEVEE
HOHOKAM
STOREY
STEELE
ROAD
PIPELINE
BM 1451
BM 1460
Latitude: N 32.89533
Longitude: W 111.51215
REF: USGS 7.5 MINUTE SERIES
COOLIDGE, ARIZONA
VALLEY FARMS, ARIZONA
SCALE: 1"= 2000'
0
1000'
2000'
HERITAGE
Project: Heritage Environmental Services, LLC
284 E. Storey Road
Coolidge, Arizona 85128
Figure 1

**FIGURE G-2**




| Line No. | Process Code | Container Storage Area | | Dimensions |
|---|---|---|---|---|
| 1 | S01 | Area 600 | Central Container Storage Area | (100 ft. x 100 ft.) |
| 2 | S01 | Area 300 | Rolloff Container Storage Area | (80 ft. x 80 ft.) |
| 3 | S01 | Area 500 | East Container Storage Area | (35 ft. x 44 ft.) |
| 4 | S01 | | Lab Depack Area | (27 ft. x 31 ft.) |
| 5 | S01 | Area 100 | Dock and Van Container Storage Area | (100 ft. x 60 ft.) |
| 6 | S01 | Area 800 | 800 Area Container Storage | (120 ft. x 76 ft.) |
| 7 | S01 | | Bulk Loading Area (Tanker and Rail) | (31 ft. x 113 ft.) |
| 10 | T04 | Area 300 | Rolloff Container Storage Area | (80 ft. x 80 ft.) |

HERITAGE ENVIRONMENTAL SERVICES

| | | |
|---|---|---|
| DRAWN BY: RSC | DATE: 07-15-2023 | |
| APP. BY: MEW | SCALE: 1" = 200' | DWG. NO. AZC1301C0050 |

HERITAGE ENVIRONMENTAL SERVICES, LLC
INDIANAPOLIS, INDIANA

HERITAGE ENVIRONMENTAL SERVICES, LLC
COOLIDGE, ARIZONA

Site Plan

24MW2019

## 3. CLOSURE PLAN AND CLOSURE PERFORMANCE STANDARD

The purpose of this Closure Plan is to identify the steps necessary to perform partial and/or final closure of the Heritage facility located in Coolidge, Arizona. This Closure Plan was prepared in accordance with the requirements contained at 40 CFR Parts 264 and 270. Until closure is completed and certified, a copy of the approved Closure Plan and all approved revisions will be maintained at the facility.

### 3.1. Summary of Closure

Heritage intends to "clean-close" the entire permitted facility during final closure. The final volume of hazardous waste at each waste management unit undergoing closure will be shipped off-site to appropriate management facilities. Units undergoing closure will be decontaminated by removing the remaining inventory of hazardous wastes from the permitted unit(s) and ancillary equipment, if any. Hazardous wastes contained in the permitted waste management units at the commencement of closure will be removed and transported to an authorized facility in accordance with the applicable requirements of 40 CFR Part 268 (Land Disposal Restrictions). After the remaining waste inventory has been removed from the permitted units, Heritage will decontaminate the units by cleaning with a high-pressure, low-volume water and cleaning reagents (detergents or solvents, as appropriate). After decontamination, concrete and soil samples will be collected from each of the units and analyzed to confirm that the units meet the closure performance standard and are suitable for other uses.

### 3.2. Closure Plan Modification

A written request to the Arizona Department of Environmental Quality for a modification to the approved Closure Plan could become necessary. Such written requests will be made whenever the following occurs:

- Changes in operating plans or facility design that materially affect the Closure Plan;
- There is a change in the expected time frame of closure; or,
- In conducting closure activities, unexpected events require a modification of the approved Plan.

Written requests for modifications will include a copy of the amended Closure Plan and will be submitted for approval at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the Closure Plan. If an unexpected event occurs during the closure period, the request for modification will be made no later than 30 days after the unexpected event.

This Closure Plan minimizes the need for post closure maintenance and minimizes any waste releases. The main aspects of the Closure Plan are highlighted below:

- All waste is removed.
- All structures and equipment are decontaminated in accordance with the Closure Plan.
- Concrete and soil sampling is conducted to demonstrate that hazardous waste is no longer present at concentrations that are considered detrimental to human health or the environment.

## 3.3. Closure Performance Standard

Heritage, as owner/operator, will, through the actions described in this Closure Plan, close the permitted container storage areas in a manner that:

- Minimizes the need for further maintenance;
- Controls, minimizes, or eliminates to the extent necessary to be protective of human health and the environment, the escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, surface water, or atmosphere;
- Complies with the closure requirements specified in 40 CFR Part 264, Subpart G for container storage areas.

The following sections describe the procedures to meet the closure performance standard for the permitted units at the Heritage facility.

## 4. NOTIFICATION OF PARTIAL OR FINAL CLOSURE

In accordance with 40 CFR 264.112(d), Heritage will notify the Arizona Department of Environmental Quality in writing at least 45 days prior to the date on which partial or final closure activities are expected to begin. The 45-day notice period is appropriate because no surface impoundment, waste pile, land treatment, or landfill units requiring an earlier notification are present at the Heritage facility. Heritage has not predicted any date upon which the facility would cease operation and undergo final closure. As final closure is not expected prior to expiration of the permits, the expected year of final closure is not required (40 CFR 264.112 (b)(7)). Heritage may require partial closure involving specific units or portions of units as described herein. The estimated closure time frame is discussed in Section 7.

## 5. ESTIMATE OF MAXIMUM INVENTORY AT CLOSURE

The maximum potential inventory of wastes on-site at the Heritage facility at the time of closure is the sum of the permitted maximum capacities for the container storage areas. Therefore, the estimated maximum waste inventory at closure for the permitted units is 1,538 - 55-gallon equivalents (84,601 gallons) and 100 cubic yards of wastes with no free liquids.

Table G-1 designates the areas that will be subject to decontamination and sampling efforts associated with the closure activities specified in the plan. Table G-1 identifies both permitted units, areas utilized for loading and unloading purposes at the facility, and the facility septic system.

# TABLE G-1
# IDENTIFICATION OF AREAS SUBJECT TO CLOSURE ACTIVITIES
# HERITAGE ENVIRONMENTAL SERVICES, LLC
# COOLIDGE, ARIZONA

| Designated Area | Unit Type | Nominal Square Footage |
|---|---|---|
| Central Container Storage Area | Permitted Storage | 10,000 |
| East Container Storage Area | Permitted Storage | 1,452 |
| Lab Depack Area | Permitted Storage | 840 |
| Rolloff Container Storage Area | Permitted Storage | 6,400 |
| Dock and Van Container Storage Area | Permitted Storage | 6,000 |
| 800 Area Container Storage | Permitted Storage | 9,120 |
| Bulk Loading Area (Tanker and Rail) | Loading/Unloading | 3,720 |
| Dock and Van Container Storage Area (1) | Loading Unloading | 5,520 |
| 10 Day Transfer Area (1) | Loading/Unloading | 750 |
| Septic System | Septic Tank and Piping | 750 |

(1) These areas are not permitted for storage of hazardous waste and are not designated on the Part A Application. They are identified as staging and loading/unloading areas that were designated by the ADEQ as SWMU's for the purpose of this Closure Plan. They are included in the Closure Plan for the purposes of complying with the corrective action requirements for the facility. Implementation of the closure requirements for these areas will satisfy any requirements for corrective action under RCRA for the facility.

## 6. DESCRIPTION OF CLOSURE ACTIVITIES

This Closure Plan is filed at the Heritage facility and is part of the facility operating record until final closure of the facility. The following activities are addressed with respect to the container storage areas at the Heritage facility:

- Descriptions of how closure will be performed;
- Methods for removing, transporting, treating, and storing or disposing of any waste residues;
- Type(s) of off-site treatment and disposal that may be necessary;
- Description of decontamination and/or removal activities necessary for any residues or contaminated containment system components upon closure of the facility, if necessary;
- Sampling procedures, analytical methods, and criteria for determining whether decontamination activities satisfy the closure performance standard.

The areas that are to be closed in accordance with the procedures specified in this Closure Plan are identified in Table G-1 and are grouped together for purposes of specifying decontamination procedures for similar structures (i.e., open areas comprised of concrete and/or other impervious, flat surfaces). Applicable OSHA regulations regarding the proper use of personal protective equipment, safe work practices, and confined space entry, as applicable, will be followed to protect personnel performing closure activities.

Closure activities involving the container storage areas are summarized below:

1. Waste materials in inventory will be shipped off-site to appropriate management facilities.
2. Any residues present on the surfaces of the pads, sumps, or trench drains associated with the container storage areas will be removed mechanically or manually and appropriately containerized and managed. The actual means of residue removal will depend on the physical properties of the residues present, if any. Removal may be performed using mechanized equipment, or by manual methods such as scraping, sweeping, or shoveling. Residues collected in this phase of closure will be shipped off-site to appropriate management facilities.
3. The interior surfaces of transfer piping, hoses, valves, pumps, and other appurtenances in contact with and associated with the transfer of hazardous waste (“transfer equipment”) will be cleaned by flushing or pressure washing using water and/or solvent or detergent to facilitate cleaning, then rinsed/flushed with water. Wash waters from pressure washing of hazardous waste transfer equipment will be transferred to appropriate containers for shipment to an off-site treatment/storage facility. Metal transfer equipment may be recycled as scrap metal in accordance with 40 CFR Part 261.6(a)(3)(iii). Alternatively, the transfer equipment could be dismantled, containerized for disposal, and disposed as hazardous waste.
4. Following removal of waste materials and any residues, a visual inspection will be performed. Any cracks, gaps, unsealed seams, or damaged areas identified by a visual inspection will be repaired and/or caulked, as appropriate. A Professional Engineer will conduct an inspection prior to repair or caulking to identify possible soil sample locations in accordance with Section 7.1 of this Plan.
5. Floors, trench drains (if any), and sumps (if any) will be pressure-washed using water and/or solvent or detergent to facilitate cleaning, and then will be rinsed with water. An industrial floor cleaner may be used to supplement cleaning of floors. The vacuum mechanism in the industrial floor cleaner may be used to remove the liquids generated

during decontamination of these areas. Wash waters from areas with trench drains and sumps will be removed by vacuum equipment or by pumping. Wash waters will be containerized and shipped off-site.

6. Floors, trench drains, and sumps will be visually inspected to verify that visible hazardous waste residues have been removed. If visually detectable residues remain, then Step 5 (above) will be repeated.
7. Wash waters will be managed as hazardous wastes unless testing indicates otherwise. All wash waters will be containerized and managed on-site or transferred to an appropriate off-site treatment/disposal facility.
8. Flooring surfaces will be inspected for significant visible discoloration, cracks, or deteriorated areas. For the purposes of the visual inspection after decontamination efforts, significant visible discoloration is discoloration that in the best professional judgment of the inspector is the result of the accumulation of hazardous waste that has penetrated into the concrete substrate and is not discoloration associated with fading, coating patches, surficial staining (e.g., rust, moisture, or similar types of discoloration). These areas may be identified for sampling by the inspector as judgmental samples at the time of closure.
9. During final facility closure, sampling and analysis of the concrete floor and soil underlying closed units will be performed in accordance with the sampling and analysis procedures described in Section 7.

Closure activities involving the septic system are summarized below:

1. All sewage will be removed and disposed of in an appropriate manner.
2. All electrical and mechanical components will be removed from the units.
3. The tops of each tank will be removed or collapsed.
4. A hole will be punched into the bottom of each tank.
5. Each emptied tank and/or the cavity produced from its excavation will be filled with earth, sand, gravel, concrete, or other approved material.
6. The surface will be regraded to provide drainage away from the closed area.
7. The ends of the abandoned drain pipes between the buildings and the septic tanks will be cut and plugged as close to the building as possible or a maximum of 5 feet outside the building foundation.

A qualified Professional Engineer registered in the state of Arizona will perform a visual inspection of the permitted container storage area and will review analytical results to determine whether the unit has been decontaminated in accordance with the Plan. The visual inspection during closure activities and procedures as described in Section 9 will be used to verify that clean closure has been achieved. The qualified Professional Engineer and an authorized representative of Heritage will certify that closure was completed in accordance with the specifications of the approved Closure Plan.

After decontamination and certification of closure are complete, the affected permitted units and associated equipment, or the facility, will be considered closed and no longer regulated as waste management units. Post-closure activities will not be required because all wastes will be removed and the waste management units will be clean-closed in accordance with the closure performance standard.

## 7. SAMPLING AND ANALYSIS

This section describes procedures and rationale for concrete and soil sampling and analysis to verify that the closure performance standard has been achieved for the facility. Detailed discussions of quality assurance/quality control procedures are specified in the Quality Assurance Project Plan (QAPP) provided as Appendix G-D. Sample collection and handling activities will be performed by trained personnel in accordance with the procedures specified in this section and in the QAPP. Analytical work will be conducted by Arizona Department of Health Services (ADHS) licensed laboratories in accordance with their established quality assurance/quality control protocols and standard operating procedures for the analytical methods specified in the QAPP.

### 7.1. Concrete and Soil Sampling Locations

Analysis of concrete and soil samples for the appropriate parameters from multiple locations in the areas undergoing closure will indicate whether constituents remain at levels of regulatory concern. Sampling locations will be selected initially by visual inspection of the concrete surfaces within the container storage areas by the Professional Engineer certifying closure. Based on visual inspection, concrete and soil sampling will be conducted at the bottom of trenches, sumps, and in areas selected by the Professional Engineer that are deteriorated, cracked, or stained, as these would be considered the most likely location for migration of constituents into the soil. These locations will be considered “directed” or “judgmental” sampling locations. Directed sampling locations will take preference over the selection of random sampling locations.

After selecting the locations based on visual inspection, additional sampling locations will be selected using a simple random sampling scheme. Simple random sampling is the method recommended in EPA Publication No. SW-846. This method was chosen as the most efficient and practical manner to accurately determine whether constituents are present in the concrete or soil at regulatory levels of concern.

Random sampling location selection will begin by superimposing a sampling grid that slightly overlaps the boundaries of each waste management unit (e.g., container storage area) to be sampled. The grid will be limited to the boundaries of the unit when obstructed from extending beyond the unit's boundaries by a building or other barrier. A grid interval length of ten feet will be used. The grid interval may be modified if site-specific conditions warrant.

Each grid intersection will represent a potential sampling location and will be assigned a number (1,2,3...n). The locations on each grid for collecting samples will be randomly selected using a statistically acceptable method of generating random numbers, such as a random number generator or random number table. Samples will be collected from each selected grid intersection. Sample locations may be offset slightly if obstructions are encountered.

In areas to be closed that contain sumps or trenches, samples of concrete and soil will be judgmentally collected. Under the assumption that the Professional Engineer certifying closure does not select specific sampling locations based on visual inspection of the concrete floors, the proposed sampling locations for each area undergoing closure (including hypothetical judgmental sampling locations in sumps

and trenches) are provided on Figures 1-1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-7, and 1-8 of the Quality Assurance Project Plan in Appendix G-D.

The anticipated number of sample locations for the container storage and staging areas and the septic system are shown in Table G-3. There is one sampling location per 800 square-feet of surface area of the unit undergoing closure, with a minimum of three locations per area (even if the area is less than 800 square-feet). In addition, there is one sampling location for each sump and two sampling locations (evenly spaced) for each trench associated with the areas undergoing closure. The number of sample locations may be modified if site-specific conditions warrant.

## 7.2. Concrete Sampling and Analysis

The following procedures will be used to verify that the concrete floors in the container storage and staging areas undergoing closure have met the closure performance standard. Following decontamination and visual inspection, concrete samples will be collected and analyzed (ran "as is") for the parameters specified in Table G-2 and in the QAPP (Appendix G-D) to verify that no hazardous wastes and their breakdown products detected by the analytical methods and specified in this Closure Plan remain in the concrete floors at levels of regulatory concern following closure.

### *7.2.1. Concrete Sampling Procedures*

At the designated sampling locations, conventional concrete coring procedures will be utilized to obtain one concrete sample per location. The coring device will be decontaminated in accordance with the procedures specified in Section 7.4 or Section 4.5 of the QAPP to ensure that the bit is clean.

The coring device will be operated following the manufacturer's procedures: When conducting the coring process, use clean water to cool the coring tool while minimizing the amount of water accumulating on the concrete floor by vacuuming, wiping, or other similar process. Prior to beginning the coring process, grind, scrape, abrade, or mechanically remove the surface coating of the concrete. Core the concrete approximately six inches or until the coring tool enters into the underlying subgrade. Once drilling is completed, remove the concrete core from the borehole and dry the core with paper towels or other suitable absorbent. After drying the core, use a mechanical device (e.g., hammer/chisel) to break the core into pieces to allow for placement into containers for laboratory analysis. If additional concrete is needed, offset from the original location and obtain additional sample.

Alternatively, the concrete could be jack hammered to a minimum depth of six inches using suitable equipment, and concrete pieces devoid of floor coating could be removed and sized to allow for placement in the sample container.

### *7.2.2. Concrete Analysis*

Concrete samples from the areas undergoing closure will be analyzed for the Target Analyte List (TAL) metals, hexavalent chromium, cyanide, volatile organic compounds, semi-volatile organic compounds, pesticides, and herbicides listed in Table G-2 in accordance with the methods specified Tables 7-1, 7-2, 7-3 and 7-4 of the QAPP (Appendix G-D) or other comparable SW-846 methods. The list of parameters in Table G-2 is based on the types of waste managed at the facility.

### *7.2.3. Concrete Clean-up Standards*

Clean closure will be determined by comparing the analytical results with the Soil Remediation Levels specified for residential land use at A.A.C. R 18-7-205, Appendix A. Alternatively, background samples of concrete could be selected at the facility using data from other units that meet the specified closure levels, or concrete areas that have not been used by the facility for hazardous waste management could be used for a comparison to background.

The constituents and method numbers for analysis of the concrete samples are specified in Tables 7-1, 7-2, 7-3, and 7-4 of the QAPP. Sample collection, handling, storage, and chain-of-custody procedures will be performed in accordance with the procedures specified in the QAPP (Appendix G-D).

## 7.3. Soil Sampling and Analysis

The following procedures will be used to sample soil underlying hazardous waste management units (e.g., container storage areas) during final facility closure. Samples collected from these areas will be analyzed (ran “as is”) for appropriate indicator parameters to verify that no hazardous wastes and their breakdown products detected by the analytical method and specified in this Closure Plan remain in underlying soils at levels of regulatory concern following closure. Sampling will be implemented in accordance with standard procedures for collection of environmental samples and may include compositing of samples in accordance with ADEQ- or U.S. EPA-approved protocols.

Analytical results will be compared to Soil Remediation Levels specified in this Closure Plan (see Tables 7-1, 7-2, 7-3, and 7-4 in Appendix G-D). Clean closure will be determined by comparing the analytical results with the Soil Remediation Levels specified for residential land use at A.A.C. R 18-7-205, Appendix A. If the results of the sampling are below the specified concentration, then the closure performance standard has been met. If sampling results exceed an established Soil Remediation Level, then background samples may be used to demonstrate clean closure in the area being closed. Appropriate remedial measures may be implemented as discussed in Section 7.3.5.

### *7.3.1. Sample Collection Procedure*

At each sampling location, a hand-operated sampling device, such as a hand auger, or mechanized drilling equipment, such as a geoprobe, will be used to bore into the soil subsurface. These activities will be consistent with industry practices. At each sampling location, discrete samples of soil will be collected at a 0- to 1-foot depth interval below natural grade. Soil samples will also be collected at a depth from 1 to 2 feet below natural grade. The samples collected at a depth of 1 to 2 feet below natural grade will be retained for possible later analysis. If analysis at the 0 to 1 foot below natural grade interval indicates that hazardous constituents exceed the Soil Remediation Levels or background concentrations, then samples from 1 to 2 feet below natural grade at the sampling location will be analyzed for those hazardous constituents exceeding the Soil Remediation Levels or background concentration. Alternatively, Heritage may elect to perform additional soil sampling as contemplated by Section 7.3.5.

Each soil sample will be placed in an appropriate container and labeled as specified in the QAPP (Appendix G-D). Before each sample location, the sampling equipment will be decontaminated as specified in Section 7.4 and in the QAPP. This procedure will be followed to prevent cross-contamination between sample locations. Sample handling, storage, and chain-of-custody procedures will be followed as outlined in the QAPP.

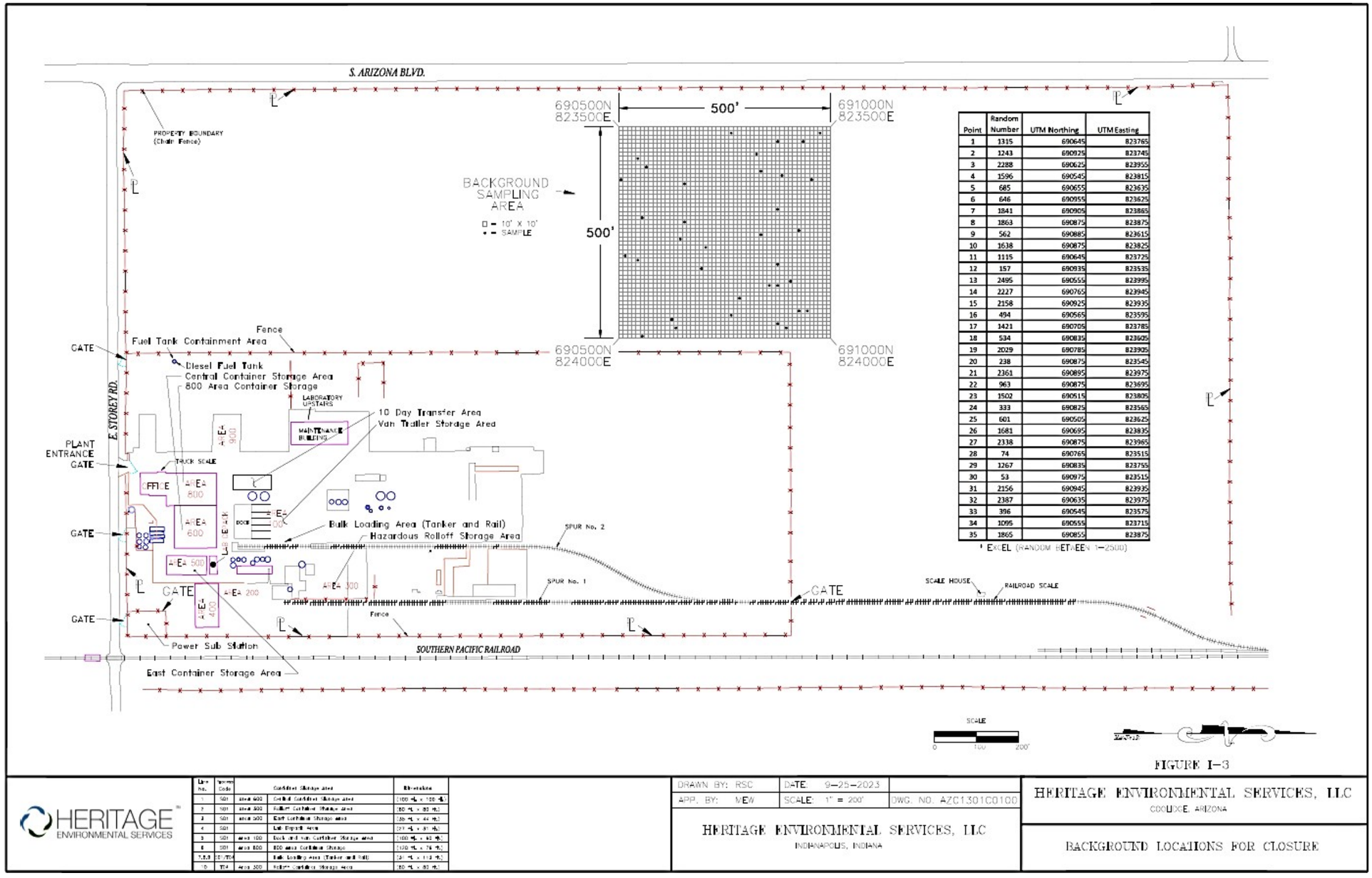
### *7.3.2. Background Samples*

Approximately 30 soil background samples will be collected in areas of the property not used for past or present waste management operations. This should provide an accurate indication of site-specific background conditions of the soil. The proposed area for collection of background soil samples would be beyond the facility fence within an area specified on Figure G-3. The specified area has not been utilized for industrial operations. The number of background sample locations may be modified if site- specific conditions warrant.

Background soil boring locations were selected by superimposing a sampling grid over the area to be sampled. A grid interval length of ten feet was used over a 500 by 500 foot square defined by the UTM Coordinates 690500N,823500E; 691000N, 823500E; 690500N,824000E; 691000N, 824000E. The grid interval may be modified if site-specific conditions warrant. Each grid intersection will represent a potential sample location and will be assigned a number (1,2,3...n). Thirty sample locations were randomly selected using a statistically acceptable method of generating random numbers. Samples will be collected from each selected grid intersection. Sample locations may be offset slightly if obstructions are encountered.

Background soil sample borings will be advanced to a total depth of approximately 1 to 2 feet below grade to approximately match the soil depths of the initial investigative soil samples collected from the facility. At each background sample location, a hand-operated sampling device, such as a hand auger, or mechanized drilling equipment, such as a geoprobe, will be used to bore into the soil subsurface. Each background sample will be placed into appropriate sample containers. Each container will be sealed and labeled as specified in the QAPP. Before each sample location, the sampling equipment will be decontaminated as specified in Section 7.4 and in the QAPP. This procedure will be followed to prevent cross-contamination between sample locations. Sample handling, storage, and chain-of-custody procedures will be followed as outlined in the QAPP.

**FIGURE G-3**




| Point | Random Number | UTM Northing | UTM Easting |
|---|---|---|---|
| 1 | 1315 | 690645 | 823765 |
| 2 | 1243 | 690925 | 823745 |
| 3 | 2288 | 690625 | 823955 |
| 4 | 1596 | 690545 | 823815 |
| 5 | 685 | 690655 | 823635 |
| 6 | 646 | 690955 | 823625 |
| 7 | 1841 | 690905 | 823865 |
| 8 | 1863 | 690875 | 823875 |
| 9 | 562 | 690885 | 823615 |
| 10 | 1638 | 690875 | 823825 |
| 11 | 1115 | 690645 | 823725 |
| 12 | 157 | 690935 | 823535 |
| 13 | 2495 | 690555 | 823995 |
| 14 | 2227 | 690765 | 823945 |
| 15 | 2158 | 690925 | 823935 |
| 16 | 494 | 690565 | 823595 |
| 17 | 1421 | 690705 | 823785 |
| 18 | 534 | 690835 | 823605 |
| 19 | 2029 | 690785 | 823905 |
| 20 | 238 | 690875 | 823545 |
| 21 | 2361 | 690895 | 823975 |
| 22 | 963 | 690875 | 823695 |
| 23 | 1502 | 690515 | 823805 |
| 24 | 333 | 690825 | 823565 |
| 25 | 601 | 690505 | 823625 |
| 26 | 1681 | 690695 | 823835 |
| 27 | 2338 | 690875 | 823965 |
| 28 | 74 | 690765 | 823515 |
| 29 | 1267 | 690835 | 823755 |
| 30 | 53 | 690975 | 823515 |
| 31 | 2156 | 690945 | 823935 |
| 32 | 2387 | 690635 | 823975 |
| 33 | 396 | 690545 | 823575 |
| 34 | 1095 | 690555 | 823715 |
| 35 | 1865 | 690855 | 823875 |

EXCEL (RANDOM BETAEEN 1–2500)

| Unit No. | Storage Code | Containment Storage Area | Dimensions |
|---|---|---|---|
| 1 | S01 | Area 600 | Central Containment Storage Area (100 ft. x 100 ft.) |
| 2 | S01 | Area 800 | Rolloff Containment Storage Area (80 ft. x 80 ft.) |
| 3 | S01 | Area 500 | East Containment Storage Area (36 ft. x 44 ft.) |
| 4 | S01 | | Lab Drywell Area (21 ft. x 31 ft.) |
| 5 | S01 | Area 100 | Dock and Van Containment Storage Area (100 ft. x 45 ft.) |
| 6 | S01 | Area 800 | 800 Area Containment Storage (120 ft. x 76 ft.) |
| 7,8,9 | T01/T04 | | Bulk Loading Area (Tanker and Rail) (24 ft. x 112 ft.) |
| 10 | T04 | Area 300 | Rolloff Containment Storage Area (80 ft. x 80 ft.) |

HERITAGE ENVIRONMENTAL SERVICES

FIGURE I-3

| | | |
|---|---|---|
| DRAWN BY: RSC | DATE: 9-25-2023 | |
| APP. BY: MEW | SCALE: 1" = 200' | DWG. NO. AZC1301C0100 |

HERITAGE ENVIRONMENTAL SERVICES, LLC
INDIANAPOLIS, INDIANA

HERITAGE ENVIRONMENTAL SERVICES, LLC
COOLIDGE, ARIZONA

BACKGROUND LOCATIONS FOR CLOSURE

### *7.3.3. Soil Analysis*

Soil samples will be analyzed for the Target Analyte List (TAL) metals, hexavalent chromium, cyanide, volatile organic compounds, semi-volatile organic compounds, pesticides, and herbicides listed in Table G-2. The analytical methods are detailed in Tables 7-1, 7-2, 7-3, and 7-4 of the QAPP. The results will be recorded and compared to clean closure levels as described in Section 7.3 of this Closure Plan and in the QAPP. The list of parameters in Table G-2 is based on the types of waste managed at the facility.

All 1- to 2- foot sample depths from background sample locations will be analyzed for the TAL metals listed in Table G-2. Inorganic parameters will be analyzed using the methods specified in Table 7-1 of the QAPP (Appendix G-D). Three randomly selected background locations will also be analyzed for the volatile organic compounds, semi- volatile organic compounds, pesticides, and herbicides specified in Table G-2 in accordance with the methods specified in Tables 7-2, 7-3 and 7-4 of the QAPP. Results of these background sample analyses will be used, in part, to establish clean closure levels for each parameter, as discussed in Section 7.2.3 of this Closure Plan and in the QAPP.

### *7.3.4. Concrete and Soil Quality Assurance/Quality Control Samples*

Duplicate samples of concrete and soil also will be submitted for analysis. Field blanks, lab blanks, field duplicates, spike/surrogates, and reference samples will be analyzed in accordance with the procedures specified in the QAPP. The constituents and method numbers for analysis of the QA/QC samples are the same as specified in the QAPP for both the concrete and soil samples. Before each sample location, the sampling equipment will be decontaminated as specified in Section 7.4 and in the QAPP. This procedure will be followed to prevent cross contamination between sample locations. Sample collection, handling, storage, and chain-of-custody procedures for the field blanks, lab blanks, field duplicates, spike/surrogates, and/or reference samples will be performed in accordance with the procedures specified in the QAPP.

### *7.3.5. Concrete and Soil Remediation Activities and Clean-up Verification*

Based on a review of the laboratory data and comparison with the clean closure standard specified in the Closure Plan, Heritage will identify any area(s) requiring further action. Should a concentration of one or more indicator parameters exceed specified clean-closure levels, as validated by QA/QC, appropriate remedial measures would be implemented. The most likely remedial measure to be employed would involve physical removal of concrete and/or contaminated soils to the depth indicated by screening analyses and any additional soil analyses.

After excavation, verification soil samples will be collected and analyzed for the parameters that initially exceeded action levels. Verification sample locations will be randomly selected as discussed in Section 7.1.

Any contaminated soils or residues generated from remedial activities will be characterized and properly treated and/or disposed of at a permitted waste management facility. Appropriate hazardous waste listings will be determined based on the listed hazardous wastes managed in the hazardous waste management unit (e.g., container storage area) being closed. Materials determined to be hazardous

wastes will be characterized in accordance with the appropriate best demonstrated available technology (BDAT) treatment standards under the Land Disposal Restrictions found at 40 CFR Part 268. Results of these analyses will be used to determine whether treatment is necessary to meet the BDAT treatment standards for that waste.

7.4. Decontamination of Sampling Equipment

To mitigate the potential for cross contamination and the introduction of contaminants from external sources, all non-disposable sampling equipment will be decontaminated. Decontamination will be performed prior to sample collection at each sample location. Sampling equipment will be decontaminated in the following manner:

- Equipment will be washed with potable “tap” water or distilled water and phosphate-free soap solution, followed by a thorough rinse with distilled or deionized water.
- Equipment will be allowed to air dry prior to sample collection.
- All disposable sampling equipment will be discarded following the collection of each sample so as to minimize cross-contamination. In addition, sampling personnel will wear clean latex gloves during the collection of each sample. Gloves will be changed prior to collection of each sample.

**TABLE G-2**
**Constituents for Concrete and Soil Analysis**
**Container Storage and Staging Areas**
**Heritage Environmental Services, LLC**
**Coolidge, Arizona**

| Volatile Organic Compounds[1] | | Semi-Volatile Organic Compounds[1] | | Inorganic Parameters |
|---|---|---|---|---|
| Benzene | trans-1,2-Dichloroethene | Acenaphthene | Hexachlorocyclopentadiene | Arsenic |
| Bromobenzene | 1,2-Dichloropropane | Acenaphthylene | Hexachloroethane | Barium |
| Bromochloromethane | 1,3-Dichloropropene | Anthracene | Indeno(1,2,3-cd)pyrene | Cadmium |
| Bromodichloromethane | 2,2-Dichloropropane | Benzo(a)anthracene | Isophorone | Chromium |
| Bromoform | 1,1-Dichloropropene | Benzo(b)fluoranthene | 2-Methylnaphthalene | Lead |
| Bromomethane | Ethylbenzene | Benzo(g,h,I)perylene | Naphthalene | Mercury |
| n-Butylbenzene | Hexachlorobutadiene | Benzo(k)fluoranthene | 2-nitroaniline | Selenium |
| sec-Butylbenzene | Isopropyltoluene | Benzyl alcohol | 3-nitroaniline | Silver |
| tert-Butylbenzene | 4-Isopropyltoluene | Butylbenzylphthalate | 4-nitroaniline | Cyanide |
| Carbon Tetrachloride | Dichlormethane | Bis (2-chloroethoxy) methane | Nitrobenzene | **Herbicides/Pesticides** |
| Chlorobenzene | Naphthalene | bis(2-chloroethyl)ether | n-Nitrosodiphenylamine | Aldrin |
| Dibromochlorobenzene | n-Propylbenezene | bis(2-chloroisopropyl)ether | n-Nitroso-di-n-propylamine | Alpha-BHC |
| Chloroethane | Styrene | bis(2-ethylhexyl)phthalate | Phenanthrene | Alpha-Chlordane |
| Chloroform | 1,1,1,2-Tetrachloroethane | 4-Bromophenylphenylether | 2-Picoline | Beta-BHC |
| Chloromethane | 1,1,2,2-Tetrachloroethane | Carbazole | Pyrene | Delta-BHC |
| 2-Chlorotoluene | Tetrachloroethene | 4-Chloroaniline | Pyridene | 4,4'-DDD |
| 4-Chlorotoluene | Toluene | 2-Chloronaphthalene | Tetrachlorobenzenes | 4,4'-DDE |
| 1,2-Dibromo-3-chloropropane | 1,2,3-Trichlorobenzene | 4-Chlorophenylphenylether | Toluenediamine | 4,4'-DDT |
| 1,2-Dibromoethane | 1,2,4-Trichlorobenzene | Chrysene | 1,2,4-Trichlorobenzene | Dieldrin |
| Dibromomethane | 1,1,1-Trichloroethane | Dibenzo(a,h)anthracene | Benzoic Acid | Endosulfan I |
| 1,2-Dichloroethane | 1,1,2-Trichloroethane | Dibenzofuran | 4-Chloro-3-methylphenol | Endosulfan II |
| 1,3-Dichloroethane | Trichloroethene | 1,2-Dichlorobenzene | 2-Chlorophenol | Endosulfan Sulfate |
| 1,4-Dichloroethane | Trichlorotrifluoromethane | 1,3-Dichlorobenzene | 2,4-Dichlorophenol | Endrin |
| Dichlorodifouoromethane | 1,2,3-Trichloropropane | 1,4-Dichlorobenzene | 2,4-Dimethylphenol | Endrin Ketone |
| 1,1-Dichloroethane | 1,2,4-Trimethylbenzene | 3,3'-Dichlorobenzidine | 4,6-Dinitro-2-methylphenol | Gamma-BHC (Lindane) |
| 1,2-Dichloroethane | 1,3,5-Trimethylbenzene | Diethylphthalate | 2,4-Dinitrophenol | Gamma-Chlordane |
| 1,1-Dichloroethene | Vinyl chloride | Dimethylphthalate | 2-Methylphenol | Heptachlor |
| cis-1,2-Dichloroethene | o-Xylene | di-n-butylphthalate | 4-Methylphenol | Heptachlor Epoxide |
| | m-/p-Xylene | Dinitrobenzene | 2-Nitrophenol | Methoxychlor |
| | | 2,4-Dinitrotoluene | 4-Nitrophenol | Toxaphene |
| | | 2,6-Dinitrotoluene | Pentachlorophenol | 2,4,5-Trichlorophenoxyacetic acid |
| | | di-n-octylphthalate | Phenol | 2,4-Dichlorophenoxyacetic acid (2,4-D) |
| | | Fluoranthene | Tetrachlorophenol | Silvex (2,4,5-TP) |
| | | Fluorene | 2,4,5-Trichlorophenol | |
| | | Hexachlorobenzene | 2,4,6-Trichlorophenol | |
| | | Hexachlorobutadiene | | |

Note: [1] Volatile organic compound and semi-volatile organic compound analyses will include tentatively identified compounds (TICs).

**Table G-3**
**ESTIMATED NUMBER OF SOIL, CONCRETE AND QUALITY ASSURANCE QUALITY CONTROL SAMPLES**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**

| Sampling Location [1], [3] | Number of Samples | Sample Matrix | Laboratory Parameters [2] | Field Quality Assurance Quality/ Control Samples [4] | | | | | | | | Estimated Totals |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Estimated Investigative Samples | | Field Matrix Duplicates | | Field Trip Blanks [5] | | Field Blanks | | |
| | | | | Number | Total | Number | Total | Number | Total | Number | Total | |
| **SOIL SAMPLES** | | | | | | | | | | | | |
| Central Container Storage Area | 19 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 19 | 1 | 1 | 1 | 1 | 1 | 1 | 22 |
| East Container Storage Area | 4 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |
| Lab Depack Storage Area | 4 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 4 | 1 | 1 | 1 | 1 | 1 | 1 | 7 |
| Rolloff Container Storage Area | 11 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 11 | 1 | 1 | 1 | 1 | 1 | 1 | 14 |
| Dock and Van Container Storage Area | 12 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 12 | 1 | 1 | 1 | 1 | 1 | 1 | 15 |
| 800 Area Container Storage | 14 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 14 | 1 | 1 | 1 | 1 | 1 | 1 | 17 |
| Bulk Loading Area (Tanker and Rail) | 4 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |
| Dock and Van Container Storage Area - Loading Unloading Station | 8 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 8 | 0 | 0 | 0 | 0 | 0 | 0 | 8 |
| 10 Day Transfer Area | 4 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |
| Septic System | 4 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |
| Background Borings - Metals | 30 | Soil | Table 7-1 | 1 | 30 | 1 | 1 | 0 | 0 | 0 | 0 | 31 |
| Background Borings - Metals & Organics | 3 | Soil | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 3 | 0 | 0 | 1 | 1 | 1 | 1 | 5 |
| ***Estimated Total Soil Samples*** | | | | | ***117*** | | ***6*** | | ***6*** | | ***6*** | ***135*** |
| **CONCRETE SAMPLES** | | | | | | | | | | | | |
| Central Container Storage Area | 16 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 16 | 1 | 1 | 1 | 1 | 1 | 1 | 19 |
| East Container Storage Area | 3 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Lab Depack Storage Area | 3 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 3 | 1 | 1 | 1 | 1 | 1 | 1 | 6 |
| Rolloff Container Storage Area | 9 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 9 | 1 | 1 | 0 | 0 | 0 | 0 | 10 |
| Dock and Van Container Storage Area | 10 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 10 | 1 | 1 | 1 | 1 | 1 | 1 | 13 |
| 800 Area Container Storage | 12 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 12 | 1 | 0 | 1 | 1 | 1 | 1 | 14 |
| Bulk Loading Area (Tanker and Rail) | 3 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Dock and Van Container Storage Area - Loading Unloading Station | 7 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 |
| 10 Day Transfer Area | 3 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Septic System | 4 | Concrete | Table 7-1, Table 7-2, Table 7-3 , and Table 7-4 | 1 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |
| ***Total Estimated Concrete Samples*** | | | | | ***69*** | | ***4*** | | ***4*** | | ***4*** | ***81*** |

(1) Figures 1-1 through 1-8 of QAPP (Appendix D) shows the randomly selected locations where the proposed soil borings will be installed. A site plan of the facility is provided on Figure I-2 of the closure plan showing the location of the permitted units.
(2) For analytical methods, practical quantitation limits, see Tables 7-1, 7-2, 7-3, and 7-4 of QAPP. See closure plan for list of analytes at each unit being closed.
(3) The frequency of sampling is one for the closure of each unit in the Closure Plan
(4) Additional sample volume required for matrix spike/matrix spike duplicate samples that will be submitted at a frequency of 1:20. Minimum frequency for matrix duplicates is 1:20
(5) Trip blanks will only be tested for volatile organic compounds.

## 7.5. Closure Waste Management

During closure of the container storage and staging areas and the septic system, Heritage will ship closure wastes off site to appropriate authorized treatment, storage, and disposal facilities. Any inventory remaining at the commencement of closure activities will be shipped to an off-site facility that offers the waste management method(s) for which the wastestreams were approved during the wastestream approval process specified in the facility's Waste Analysis Plan (Permit Attachment B). Closure wastes generated from decontamination activities (e.g., wash waters) will be characterized and properly treated and/or disposed of at a permitted waste management facility in accordance with the following order of preference: 1) ship off site to another Heritage facility; or 2) ship off-site to a third party commercial waste management facility.

Although other Heritage facilities will be able to accept and manage wastes from the Coolidge facility, for purposes of preparing this Closure Plan, it is assumed that a third party facility will perform all processing, treatment, and disposal. Heritage maintains an extensive list of third party facilities approved for receipt of wastes. This list will change over time as approved facilities are added and others are deleted. The final selection of actual third party facilities at the time of closure will depend on a variety of factors including, but not limited to:

1. The current permit and compliance status of the facility;
2. The current financial viability of the facility;
3. Processing capabilities of the facility relative to waste-specific physical and chemical characteristics of the waste;
4. Current regulatory requirements for management of the particular waste type, including Land Disposal Restrictions requirements;
5. Current pricing and market factors for the type of management conducted by the facility;
6. Distance to the facility relative to competitors and cost-effectiveness of the mode of transport (e.g., rail vs. highway).

Heritage will use only RCRA-permitted or approved interim status facilities for treatment, storage, or disposal of any hazardous wastes generated during closure. Facilities used for management of non-hazardous wastes generated during closure will be permitted in accordance with the applicable state's regulations regarding treatment, storage, or disposal of non-hazardous waste.

Treatment/disposal arrangements for the wastes in inventory at closure and the wastes generated during closure will be made by following the facility-specific procedures required by the off-site disposal facility. Wastes in inventory at closure will already have established waste profiles available, in accordance with the Heritage Waste Analysis Plan (Permit Attachment B). For wastes generated during closure, Heritage will appropriately characterize each waste stream and make a proper hazardous waste determination in accordance with 40 CFR Part 262.11. Investigation derived waste (i.e., soil samples, personal protective equipment, and decontamination materials) will be managed in accordance with the ADEQ policy on Investigation Derived Waste, which is incorporated by reference. Appropriate hazardous waste listings will be determined based on the listed hazardous wastes managed in the waste management unit being closed. Materials determined to be hazardous wastes will be evaluated with respect to the appropriate treatment

standards under the Land Disposal Restrictions found at 40 CFR Part 268. Results of these determinations will be used to determine whether treatment is necessary to meet the LDR requirements.

Off-site shipments of hazardous wastes from Heritage will be accompanied by a uniform hazardous waste manifest. Land Disposal Restriction notices will accompany the shipment, where required, in accordance with 40 CFR Part 268. Wastes will be properly described, packaged, marked, and labeled in accordance with applicable US DOT regulations found at 49 CFR Parts 171-I79.

## 8. CLOSURE SCHEDULE

Within 90 days after receiving the known final volume of hazardous waste at a specific hazardous waste management unit (partial closure) or at the entire facility (final closure), Heritage will remove hazardous wastes remaining in units undergoing closure in accordance with this Plan.

An anticipated schedule for final closure of the Heritage facility is provided in Appendix G-A.

## 9. EXTENSION FOR CLOSURE

Within 90 days after receiving the known final volume of waste at a specific waste management unit (partial closure) or at the entire facility (final closure), Heritage will complete removal of the waste in accordance with the approved Closure Plan. Although not anticipated, Heritage may propose modifications to the approved Closure Plan or otherwise petition the Arizona Department of Environmental Quality (ADEQ) to obtain approval for a longer period to remove the waste. Closure regulations found at 40 CFR Part 264.113(a) allow approval of a longer period for removal of the final volume of wastes, provided that Heritage complies with all applicable requirements for requesting a permit modification and demonstrates that:

- the activities required to comply with this time period will, of necessity, take longer than the allotted time to complete; or
- the waste management unit or facility has the capacity to receive additional wastes; and,
- there is a reasonable likelihood that Heritage or another person will recommence operation of the waste management unit or the facility within one year; and,
- closure of the waste management unit or facility would be incompatible with continued operation of the site; and,
- Heritage has taken and will continue to take all steps to prevent threats to human health and the environment, including maintaining compliance with all applicable permit requirements.

Within 180 days after receiving the known final volume of waste at a specific waste management unit (partial closure) or at the entire facility (final closure), Heritage will complete closure activities in accordance with the approved Closure Plan. Although not anticipated, Heritage may propose modification to the approved Closure Plan or otherwise petition the ADEQ to obtain an extension to the closure period. Closure regulations found at 40 CFR 264.113(b) allow for approval of an extension to the closure period, provided that Heritage complies with all applicable requirements for requesting a permit modification and demonstrates that:

- The partial or final closure activities required to comply with the closure plan will, of necessity, take longer than 180 days to complete; or
- The waste management unit or facility has the capacity to receive additional wastes; and,
- There is a reasonable likelihood that Heritage or another person will recommence operation of the unit within one year; and,
- Closure of the waste management unit or facility would be incompatible with continued operation of the site; and,
- Heritage has taken and will continue to take steps to prevent threats to human health and the environment, including maintaining compliance with applicable permit requirements.

The demonstration with respect to the extension of the 90-day period will be made at least 30 days prior to the expiration of the 90-day period allowed for removal of all wastes from the unit or facility. The demonstration with respect to extension of the 180-day period will be made at least 30 days prior to the expiration date for completion of closure activities.

## 10. CERTIFICATION OF CLOSURE

The certification process and the documents that will be prepared following completion of the closure process are described below.

### 10.1. Closure Certification

Within 60 days after completion of partial or final closure, Heritage will submit to the ADEQ by certified mail, a certification that the waste management unit or facility, as applicable, has been closed in accordance with the approved Closure Plan. The certification will be signed by an appropriate authorized signatory of Heritage and by a qualified Professional Engineer registered in the State of Arizona. Documentation supporting the qualified Professional Engineer's certification will be furnished to the ADEQ upon request until such time as Heritage is released from the financial assurance requirements for closure. Certification language will conform to specified requirements current at the time of closure. An example of closure certification language is presented in Appendix G-B.

### 10.2. Closure Report

A closure documentation report will be submitted upon the request of the ADEQ. The closure documentation report will include the following:

- The volume of the waste removed
- The method of waste handling and transport
- Waste manifest numbers or copies of manifests
- The sampling and analysis methods utilized
- A chronological summary of closure activities
- Analytical results
- A request for release from the financial assurance requirement

## 11. CLOSURE COST ESTIMATE

The estimated costs for the closure of the container storage and staging areas and the septic system at the Heritage facility in Coolidge, Arizona are itemized below. The itemized estimated closure costs and the total estimated cost for the closure of the container storage and staging areas are provided in Table G-4. The closure cost estimate was compiled utilizing third-party transportation, treatment, and disposal firms. Portions of this closure cost estimate may be applicable in the event of partial closure(s) involving individual waste management units.

This closure cost estimate will be modified within 30 days after a revision has been made to the Closure Plan that increases the cost of closure, as required. The total closure cost estimate will be updated annually in accordance with the guidelines provided at 40 CFR 264.142(b).

**Table G-4**
**ESTIMATED CLOSURE COSTS**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**

| LINE | DESCRIPTION | TOTALS | EXPLANATORY NOTES |
|---|---|---|---|
| 1 | ***Disposal of Maximum Inventory*** | | |
| 2 | Central Containter Storage Area | $ 143,344 | |
| 3 | East Container Storage Area | $ 37,394 | |
| 4 | Bulk Loading Container Storage Area | $ 118,415 | |
| 5 | Dock and Van Container Storage Area | $ 58,074 | |
| 6 | 800 Container Storage Area | $ 115,871 | |
| 7 | Lab Dapack CSA | $ 6,232 | |
| 8 | Rolloff Storage Area | $ 114,434 | |
| 9 | 10-day Area | $ 33,224 | |
| 10 | Septic System | $ 3,343 | |
| 11 | **Disposal Subtotal** | **$ 630,330** | |
| 12 | ***Transportation*** | | |
| 13 | Central Containter Storage Area | $ 60,469 | |
| 14 | East Container Storage Area | $ 15,774 | |
| 15 | Bulk Loading Container Storage Area | $ 49,952 | |
| 16 | Dock and Van Container Storage Area | $ 24,498 | |
| 17 | 800 Container Storage Area | $ 48,879 | |
| 18 | Lab Dapack CSA | $ 2,629 | |
| 19 | Rolloff Storage Area | $ 48,273 | |
| 20 | 10-day Area | $ 14,015 | |
| 21 | Septic System | $ 1,410 | |
| 22 | **Transportation Subtotal** | **$ 265,900** | |
| 23 | ***Decontamination and Dismantling*** | | |
| 24 | Central Containter Storage Area | $ 52,720 | |
| 25 | East Container Storage Area | $ 7,655 | |
| 26 | Bulk Loading Container Storage Area | $ 3,690 | |
| 27 | Dock and Van Container Storage Area | $ 60,734 | |
| 28 | 800 Container Storage Area | $ 48,081 | |
| 29 | Lab Dapack CSA | $ 4,429 | |
| 30 | Rolloff Storage Area | $ 33,741 | |
| 31 | 10-day Area | $ 3,954 | |
| 32 | Septic System | $ 11,245 | |
| 33 | **Decontamination and Dismantling Subtotal** | **$ 226,249** | |
| 34 | ***Concrete & Soil Sampling*** | | |
| 35 | Central Container Storage Area | $ 4,842 | |
| 36 | East Container Storage Area | $ 908 | |
| 37 | Bulk Loading Area (Tanker and Rail) | $ 908 | |
| 38 | Dock and Van Container Storage Area | $ 3,027 | |
| 39 | Dock and Van Container Storage Area - Loading Unloading Station | $ 2,119 | |
| 40 | 800 Area Container Storage | $ 3,632 | |
| 41 | Lab Depack CSA | $ 908 | |
| 42 | Rolloff Storage Area | $ 2,724 | |
| 43 | 10 Day Area | $ 908 | |
| 44 | Septic System Sampling | $ 2,421 | |
| 45 | Background Samples | $ 16,838 | |
| 46 | Waste Determination Sampling | $ 3,577 | |
| 47 | **Sampling Subtotal** | **$ 42,811** | |
| 48 | ***Soil and Concrete Sample Analysis*** | | |
| 49 | Central Container Storage Area | $ 64,921 | |
| 50 | East Container Storage Area | $ 11,084 | |
| 51 | Lab Depack CSA | $ 20,585 | |
| 52 | Rolloff Storage Area | $ 38,003 | |
| 53 | Dock and Van Container Storage Area | $ 44,336 | |
| 54 | 800 Area Container Storage | $ 49,087 | |
| 55 | Bulk Loading Area (Tanker and Rail) | $ 11,084 | |
| 56 | Dock and Van Container Storage Area - Loading Unloading Station | $ 23,752 | |
| 57 | 10 Day Area | $ 11,084 | |
| 58 | Septic System | $ 12,668 | |
| 59 | Background Samples - Metals | $ 13,694 | |
| 60 | Background Samples - Metals & Organics | $ 7,917 | |
| 61 | Decontamination Wash Water | $ 1,583 | |
| 62 | Waste Determination Analysis - Decontamination Liquid | $ 12,668 | |
| 63 | Waste Determination Analysis - Soil/Concrete | $ 1,121 | |
| 64 | **Sample Analysis Subtotal** | **$ 323,587** | |
| 65 | **Subtotal Closure Costs (2023 Dollars)** | **$ 1,488,878** | |
| 66 | Engineering and Certification Services | $ 223,332 | 15% of Subtotaled Closure Costs |
| 67 | Contingency (20%) | $ 342,442 | 20% of Subtotaled Closure Costs and Engineering Costs |
| 68 | **Total Closure Costs (2023 Dollars)** | **$ 2,054,652** | |

**Table G-5**
**ESTIMATED DISPOSAL AND TRANSPORTATION COSTS FOR CLOSURE**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**

| LINE | DESCRIPTION | UNITS | AMOUNT | UNIT COST | TOTALS | Probable TSD Location | Miles | Loads Rounded | Loaded Mile Unit Price | Extended Cost | Load Rate | Vendor |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | ***Disposal of Maximum Inventory*** | | | | | | | | | | | |
| 2 | Flammable/Combustible Liquids | 55 Gallon Containe | 584 | $ 246.25 | $ 143,809 | Clean Earth - Femley NV | 1302 | 10.313 | $ 2.58 | $ 34,630.20 | $ 3,358.08 | Triad (32% Fuel Surcharge) |
| 3 | Flammable Solids | 55 Gallon Containe | 141 | $ 348.05 | $ 49,075 | Clean Earth - Femley NV | 1302 | NA | | | | |
| 4 | Aerosols and Cylinders | 55 Gallon Containe | 100 | $ 246.25 | $ 24,625 | Clean Earth - Femley NV | 1302 | | | | | |
| 5 | Incineration | 55 Gallon Containe | 94 | $ 348.05 | $ 32,717 | Clean Harbors - Aragonite - Tooele UT | 709 | 2.8000 | $ 3.35 | $ 6,652.80 | $ 2,376.00 | Triad (32% Fuel Surcharge) |
| 6 | Acids | 55 Gallon Containe | 98 | $ 246.25 | $ 24,132 | Republic - Beatty NV | 465 | 5.4375 | $ 4.54 | $ 11,484.00 | $ 2,112.00 | Triad (32% Fuel Surcharge) |
| 7 | Caustics | 55 Gallon Containe | 98 | $ 246.25 | $ 24,132 | Republic - Beatty NV | 465 | NA | | | | |
| 8 | Aqueous Solutions with Heavy Metals | 55 Gallon Containe | 98 | $ 246.25 | $ 24,132 | Republic - Beatty NV | 465 | NA | | | | |
| 9 | Cyanide | 55 Gallon Containe | 35 | $ 246.25 | $ 8,619 | Republic - Beatty NV | 1745 | 0.56250 | $ 2.48 | $ 2,430.20 | $ 4,320.36 | Triad (32% Fuel Surcharge) |
| 10 | Lab Pack - Treatable | 55 Gallon Containe | 65 | $ 332.91 | $ 21,639 | Clean Harbors - Aragonite - Tooele UT | 709 | NA | | | | |
| 11 | Lab Pack - Incinerable | 55 Gallon Containe | 65 | $ 499.36 | $ 32,458 | Clean Harbors - Aragonite - Tooele UT | 709 | NA | | | | |
| 12 | RCRA Subtitle C Landfill Solids | 55 Gallon Containe | 141 | $ 348.05 | $ 49,075 | Republic - Beatty NV | 465 | NA | | | | |
| 13 | Mercury | Containers | 10 | $ 348.05 | $ 3,480 | WM - Union Grove WI | 1745 | 1 | $ 4.65 | $ 8,114.25 | $ 2,163.15 | CT (4.50 % Fuel Surcharge) |
| 14 | Dry Bulk Solid Wastes | Yards | 100 | $ 209.10 | $ 20,910 | Republic - Beatty NV | 465 | 7 | $ 4.65 | $ 15,142.05 | $ 2,163.15 | CT (4.50 % Fuel Surcharge) |
| 15 | Excavated Soil and Concrete | Yards | 238 | $ 323.29 | $ 77,072 | Republic - Beatty NV | 465 | 23 | $ 4.65 | $ 49,752.45 | $ 2,163.15 | CT (4.50 % Fuel Surcharge) |
| 16 | Decontamination Liquids - Containment Areas | Gallons | 171,648 | $ 0.55 | $ 94,454 | Liquid Environmental Solutions - Phoenix AZ | 64 | 30 | $ 8.08 | $ 15,518.25 | $ 517.28 | CT (4.50 % Fuel Surcharge) |
| 17 | **Disposal Subtotal (2023)** | | | | **$ 630,330** | | | | | | | |
| 19 | ***Transportation*** | | | | | | **Per Load Unit Cost by Container Type** | | | | | |
| 20 | Container Storage Area Wastes | Load | 19 | $ 5,841.10 | $ 111,638 | 80 Containers/Load | 55 Gallon Container | | | $ 5,841.10 | | |
| 21 | Dry Bulk Solid Wastes | Load | 7 | $ 3,881.51 | $ 27,171 | 15 Tons/Box | Bulk Shipments -Yards | | | $ 3,881.51 | | |
| 22 | Excavated Soil and Concrete | Load | 24 | $ 3,881.51 | $ 93,156 | 15 Tons/Box @ 1.5 Tons/Yard - Concrete @ 4000 lbs/yd - Soil @2000 lbs/yd | Bulk Shipments -Yards | | | $ 3,881.51 | | |
| 23 | Decontamination Liquids - Containment Areas | Load | 32 | $ 711.61 | $ 22,772 | 5500 gallons/load | Decon Water - Tanker | | | $ 711.61 | | |
| 24 | Mercury Containers | Loads | 1 | $ 11,162.70 | $ 11,163 | > 10 Containers/ load | Mercury Containers | | | $ 11,162.70 | | |
| **25** | **Transportation Subtotal (2023)** | | | | **$ 265,900** | | | | | | | |

**Table G-6**
**ESTIMATED DECONTAMINATION AND DISMANTLING COSTS FOR CLOSURE**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**

| | *Decontamination and Dismantling* | UNITS | AMOUNT | UNIT COST | TOTALS | EXPLANATORY NOTES | SOURCE INFORMATION |
|---|---|---|---|---|---|---|---|
| 1 | Removal and Loading of Containerized Wastes | Units | 1,536 | $ 2.64 | $ 4,055 | Cost to Move Containers and Load On Trucks | Cost Pro Unit Rate Provided by ADEQ |
| 2 | Removal and Loading of Bulk Containers | Units | 5 | $ 40.00 | $ 200 | Cost to Load Onto Trucks | Estimated Cost for Contractor to Supervise Loading |
| 3 | Sweeping of Concrete Surfaces | Square Feet/1000 | 43 | $ 19.01 | $ 816 | Square Footage of Closure Areas Manually Swept or Vacuumed | Cost Pro 6.0 Unit Rate |
| 4 | Pressure Washing and Rinsing of Concrete | Square Feet | 42,912 | $ 2.66 | $ 114,146 | Square of Footage of Concrete Floors Closure Areas | Cost Pro 6.0 Unit Rate |
| 5 | Pumping of Decontamination Water to Portable Tank | 1000 Gallons | 172 | $ 3.37 | $ 579 | | Cost Pro 6.0 Unit Rate |
| 6 | Demolition of Concrete | Square Feet | 4291 | $ 2.00 | $ 8,582 | 10% of Square Footage | Cost Pro and Calculate Volume of Material @ 0.75 feet thick to accommodate curbing remove |
| 7 | Removal of Concrete and Loading | Cubic Yards | 119 | $ 22.44 | $ 2,675 | 10% of Square Footage Removed to a depth of 0.75 feet | Cost Pro 6.0 Unit Rate |
| 8 | Removal of Contaminated Soil | Cubic Yards | 119 | $ 3.21 | $ 383 | 10% of Square Footage Removed to a depth of 0.75 feet | Cost Pro 6.0 Unit Rate |
| 9 | Storage Containers for Concrete and Soil | Week | 24 | $ 533.00 | $ 12,707 | 15 Tons/Box | Cost Pro Unit Rate for Roll Off Boxes Assuming Concrete at 4000 lbs/yard |
| 10 | Bulk Storage Container for Decontamination Liquids | Month | 6 | $ 900.00 | $ 5,400 | 21,000 Gallons/Container, 2 Containers for 3 months | Baker Tanks Unit Rate * 30 Days - Baker Tank Fee Schedule |
| 11 | Mobilization/Demobilization Containers | Each | 30 | $ 500.00 | $ 14,920 | Mobilization/Demobilization Costs for Portable Containers | Cost Pro V.6.0 Drop Fee for Roll Off Boxes - Baker Tanks 21,000 Gallons |
| **12** | **Decontamination and Dismantling Subtotal (2009)** | | | | **$ 164,462** | | |
| **13** | **Adjust for Inflation (2023)** | | | | **$ 226,249** | | |

**Table G-7**
**ESTIMATED CONCRETE AND SOIL SAMPLING COSTS FOR CLOSURE**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**

| | *Concrete & Soil Sampling* | UNITS | AMOUNT | UNIT COST | TOTALS | EXPLANATORY NOTES | SOURCE INFORMATION |
|---|---|---|---|---|---|---|---|
| 1 | Central Container Storage Area | Sample Locations | 16 | $ 302.65 | $ 4,842 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 2 | East Container Storage Area | Sample Locations | 3 | $ 302.65 | $ 908 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 3 | Bulk Loading Area (Tanker and Rail) | Sample Locations | 3 | $ 302.65 | $ 908 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 4 | Dock and Van Container Storage Area | Sample Locations | 10 | $ 302.65 | $ 3,027 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 5 | Dock and Van Container Storage Area - Loading Unloading Station | Sample Locations | 7 | $ 302.65 | $ 2,119 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 6 | 800 Area Container Storage | Sample Locations | 12 | $ 302.65 | $ 3,632 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 7 | Lab Depack Storage Area | Sample Locations | 3 | $ 302.65 | $ 908 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 8 | Rolloff Container Storage Area | Sample Locations | 9 | $ 302.65 | $ 2,724 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 9 | 10 Day Transfer Area | Sample Locations | 3 | $ 302.65 | $ 908 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 10 | Septic System Sampling | Sample Locations | 8 | $ 302.65 | $ 2,421 | 2 Samples/Location - Grid Based on Closure Plan Random/Judgmental Sample Criteria | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 11 | Background Samples | Sample Locations | 72 | $ 233.87 | $ 16,838 | 1 Soil Sample Per Location | Cost Pro Per Location for Both Concrete Coring and Soil Boring Provided by ADEQ |
| 12 | Waste Determination Sampling | Samples Collected | 13 | $ 275.14 | $ 3,577 | 8 Samples Decon Liquid 5 Samples Soil/Concrete Collected at $100/Sample | See SA-6, Heritage Estimate is 2X the CostPro for collection of water samples etc. |
| **13** | **Sampling Subtotal (2023)** | | **159** | | **$ 42,811** | | |

**Table G-8**
**ESTIMATED CONCRETE AND SOIL SAMPLE ANALYSIS COSTS FOR CLOSURE**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**

| | *Soil and Concrete Sample Analysis* | UNITS | AMOUNT | UNIT COST | TOTALS | EXPLANATORY NOTES | SOURCE INFORMATION |
|---|---|---|---|---|---|---|---|
| 1 | Central Container Storage Area | Samples | 41 | $ 1,583.45 | $ 64,921 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 2 | East Container Storage Area | Samples | 7 | $ 1,583.45 | $ 11,084 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 3 | Lab Depack Storage Area | Samples | 13 | $ 1,583.45 | $ 20,585 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 4 | Rolloff Container Storage Area | Samples | 24 | $ 1,583.45 | $ 38,003 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 5 | Dock and Van Container Storage Area | Samples | 28 | $ 1,583.45 | $ 44,336 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 6 | 800 Area Container Storage | Samples | 31 | $ 1,583.45 | $ 49,087 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 7 | Bulk Loading Area (Tanker and Rail) | Samples | 7 | $ 1,583.45 | $ 11,084 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 8 | Dock and Van Container Storage Area - Loading Unloading Station | Samples | 15 | $ 1,583.45 | $ 23,752 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 9 | 10 Day Transfer Area | Samples | 7 | $ 1,583.45 | $ 11,084 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 10 | Septic System Sampling | Samples | 8 | $ 1,583.45 | $ 12,668 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 11 | Background Samples - Metals | Samples | 31 | $ 441.73 | $ 13,694 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 12 | Background Samples - Metals & Organics | Samples | 5 | $ 1,583.45 | $ 7,917 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 13 | Decontamination Wash Water | Samples | 1 | $ 1,583.45 | $ 1,583 | TAL Metals, Hexavalent Chromium, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 14 | Waste Determination Analysis - Decontamination Liquid | Samples | 8 | $ 1,583.45 | $ 12,668 | 1 Sample Per Portable Tank Generated, TAL Metals, Cyanide, Volatiles, Semi Volatiles, Pesticides and Herbicides | Eurofins Environment Testing - Phoenix |
| 15 | Waste Determination Analysis - Soil/Concrete | Samples | 5 | $ 224.26 | $ 1,121 | 1 Sample Per 50 Cubic Yards Generated, TCLP RCRA Metals | Eurofins Environment Testing - Phoenix |
| **16** | **Sample Analysis Subtotal (2023)** | | | | **$ 323,587** | | |

## 12. FINANCIAL ASSURANCE

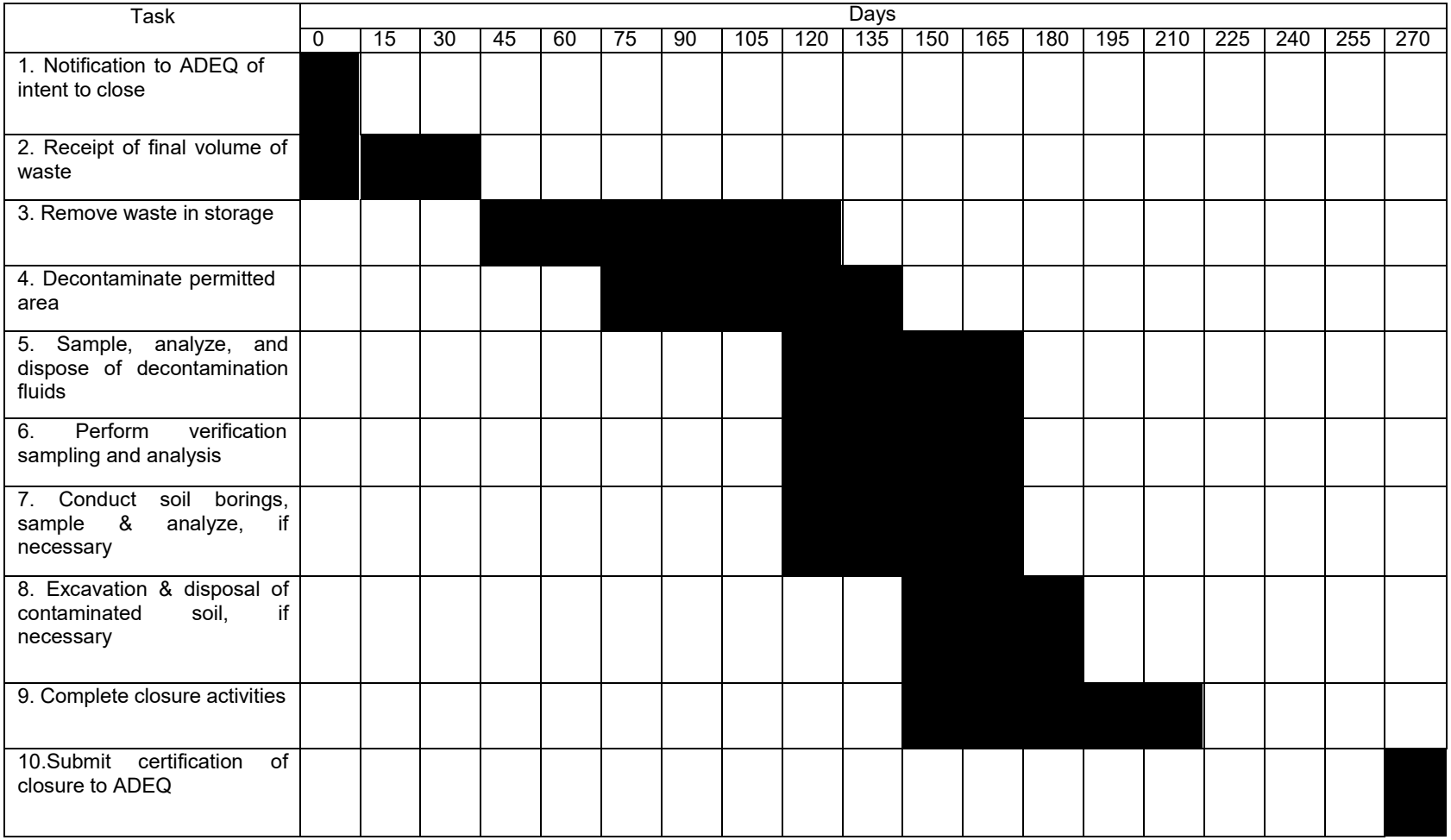
Heritage has established a performance bond as the financial assurance mechanism for facility closure in accordance with 40 CFR Part 264.143(d). A standby trust agreement is established in accordance with 40 CFR Part 264.143(d)(3).

The closure cost estimate will be modified within 30 days after a revision has been made to the closure plan which increases the cost of closure as required at 40 CFR Part 254.142(c). The total closure cost estimate will be updated annually according to the guidelines provide at 40 CFR Part 264.142(b). A copy of the original performance bond and standby trust agreement are provided in Appendix G-C.

# APPENDIX G-A

# ANTICIPATED CLOSURE SCHEDULE

**ANTICIPATED FINAL CLOSURE SCHEDULE**
**HERITAGE ENVIRONMENTAL SERVICES, LLC**
**COOLIDGE, ARIZONA**



# APPENDIX G-B

# CLOSURE CERTIFICATION STATEMENT

## Facility Closure Certification - Owner

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

US EPA ID Number: AZD 081 705 402

Heritage Environmental Services, LLC

| _____ | _____ | _____ |
|---|---|---|
| Signature of Responsible Officer | Printed Name | Date |

## Facility Closure Certification – Professional Engineer

I,_____, a registered professional engineer, hereby certify that I have verified to the best of my knowledge and belief that Professional Engineering Closure Certifications were issued for all prior closure activities at

Heritage Environmental Services, LLC; 284 East Storey Road; Coolidge, Arizona 85128

and that I have made visual inspection(s) of the aforementioned facility, and closure of the aforementioned facility has been performed in accordance with the specifications contained in the closure plan for the facility approved by the Arizona Department of Environmental Quality, Waste Programs Division.

| _____ | _____ | _____ |
|---|---|---|
| Signature of Registered P.E. | Printed Name | Date |

_____

*Professional Seal (Pursuant to A.R.S Section 32-125)*
*Issued by the Arizona Board of Technical Registration*