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S&ME

MEMORANDUM

TO: Allen Steam Station – RAB Landfill Design Team

FROM: Ken Daly, S&ME

DATE: February 21, 2008

SUBJECT: **Proposed Response Action Plan (RAP)**
Plant Allen RAB Ash Landfill Design

Proposed Response Action Plan

The purpose of the response action plan is to describe the necessary course of action if or when the action leakage rate (ALR) is exceeded in any of the sumps. The following steps must be taken and documented in the event of an exceedence.

Step 1:
Review physical equipment function and data to confirm ALR exceedence. Review operations to evaluate where operating equipment may have contacted the landfill liner or how landfill operations may have influenced the exceedence.

Step 2:
Within 14 days of identifying that the action leakage rate has been exceeded, the facility shall contact the Division in writing.

Step 3:
Within 30 days of identifying that the action leakage rate has been exceeded, the facility shall submit to the Division a written preliminary assessment which shall include at a minimum:

- the amount of the liquid exceedence;
- likely sources of the liquids;
- the possible leak location;
- the possible leak size;
- the probable cause of the leak; and
- an outline of the short-term actions being taken and planned.

Step 4:
To the extent practicable, evaluate the location, size and cause of the leak; and assess the potential for escaping into the environment and its mobility. Perform a chemical analysis

of the liquid to evaluate the potential hazards. Establish whether or not the unit should be closed or receipt of waste be curtailed; and conclude whether waste should be removed from the unit for inspection, engineered controls, or repair. Evaluate what other short-term or long-term measures should be taken to mitigate or stop any leaks.

Step 5:
Within 60 days of identifying that the action leakage rate has been exceeded, submit to the Division the results of the analysis performed in Step 4, any actions taken, and any further measures planned. For as long as there is an exceedence of the action leakage rate, the owner or operator shall submit monthly reports to the Division summarizing the results of the remedial actions taken and further actions planned.