



*Simplot Rock Springs Consent Decree  
Appendix 5.B*

## Appendix 5.B

### Inspections and Integrity of Tanks, Sumps, and Secondary Containment

Rock Springs  
Final

May 13, 2020

Corporate Environmental & Regulatory Affairs  
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BMP – Inspections and Integrity of  
Tanks, Sumps and Secondary Containment  
Simplot Rock Springs

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## I. INTRODUCTION

Simplot Phosphates LLC operates a phosphate fertilizer manufacturing facility located at 515 South Hwy 430, Rock Springs, Wyoming (“Facility”). The Facility operates and maintains process sumps (“Process Sumps”) with associated pads and separate leak detection systems throughout the complex. The purpose of these Process Sumps and pads is to efficiently utilize process materials and to minimize potential environmental liabilities. See Attachment I for a list of all sumps and pads in the Facility. See Attachment IV for a map showing each of their locations within the Facility.

This program (or “Program”) provides instructions for: managing the accumulation of process liquids (“Process Liquids”) in Process Sumps and pads; inspecting Process Sumps and pads; and pumping process sumps and pads. This Program also provides instructions for inspection of storage tanks, as defined below. Most Process Sumps will be pumped utilizing a vacuum truck. All other sumps will be pumped utilizing other means, i.e., portable sump pumps. All Process Sumps are to be pumped down to the extent possible and visually inspected every quarter by the sump and pad team, which consists of an area production manager, an operator, applicable area shift supervisor (“Shift Supervisor”) and environmental department representative. Inspections department personnel participate on an as needed basis. The sumps are prepared for inspection by the area production manager or Shift Supervisor and inspected by the sump and pad team. Any issue with the sump will be documented during the inspection, and the sump will be inspected weekly until such time the issue is resolved. If cleaning and inspecting a Process Sump is not possible for some reason, the production manager must document the reason on the sump report form.

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## II. OPERATING PROCEDURE

Process Sumps and pads will be managed in a manner to ensure that Process Liquids stay within the sump, pad, and associated containment areas at all times. The Facility process sumps are designed and used to handle Process Liquids and to minimize the potential for these materials to be released in to the environment. Efforts should be made to keep the Process Sumps and pads as dry as possible and minimize the liquid level in the Process Sumps.

### A. General Instructions for a Sump and Secondary Containment Visual Inspection

There will be two separate inspections conducted and recorded for all Process Sumps and pads. The first inspection will be scheduled quarterly and prepared for inspection by the area production manager and then inspected by the sump and pad team. The sump checklist form will be utilized for the inspection (Attachment V). The second inspection will be completed by the inspections department after a vacuum truck operator has removed all liquids from and otherwise cleaned the Process Sump. This second inspection will be conducted whenever major plant outages, turnarounds, or other events in the Phosphoric Acid and Granulation Plant areas allow for the sumps to be drained or when the operations group or sump/pad team inspection notes a more thorough inspection is needed to identify issues with a sump. These sump inspections shall occur at least once every 5 years.

#### 1.0 Area Operations Sump and Secondary Containment Inspections

Area production managers will schedule and prepare Process Sumps and pads for inspection. The sump and pad team will be notified of the inspection date and time. The inspections are designed to identify cracks, defects, debris, chips, leaks, holes, severe corrosion/erosion, and pluggage in the following areas:

- Pad(s)
- Process Trenches Leading to Sump
- Process Lines Leading to and from Sump
- Sump Pump and Motor
- Float Switch/Level Indicator
- Tanks and Pumps on Pad Area Leading to Sump
- Leak Detection on Double-Walled Sumps

#### 2.0 Secondary Containment and Leak Detection Systems

If a sump or pad is designed with secondary containment, the leak detection port(s) will be opened during the quarterly inspection and checked. See Attachment II for a list of all sumps and pads with secondary containment and leak detection ports.

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If liquid is noted in the leak detection port, the following procedure will be followed:

1. Measure the liquid level.
2. If possible, obtain a sample and submit to the analytical lab for analysis. All sample results will be collected by the Shift Supervisor and documented on the corresponding sump inspection form.
3. Pump out the liquid.
4. If a defect is found in the pad or secondary containment system during the course of the inspection, issue a work order immediately for pad and/or sump repair. Record the work order number on the inspection report. Work will be scheduled by the shift supervisor to correct the problem, and the repairs will be completed as soon as possible.
5. Once the work has been completed the Shift Supervisor must contact the environmental department so that they may follow up on the report with the repairs that were done. The Shift Supervisor must also notify the appropriate production manager that the work has been completed.
6. If more than five gallons of low pH (<2) liquid is found in a secondary containment system on a repetitive basis, and the source cannot be identified (i.e., no obvious leaks or cracks are observed during the monthly inspection), the production manager is responsible to assemble the necessary resources to identify and correct the problem.
7. Until the issue is resolved, a more frequent (at least weekly) inspection of the secondary containment system will be conducted. The results of these additional inspections (activities, date, volume of liquid removed, etc.) will be documented and attached to the monthly sump inspection form.

## B. Tank Inspections

This section outlines the general tank inspection procedures for tanks that meet the criteria outlined in the applicability criteria (“Applicability Criteria”) below. The tanks that fall under the criteria are listed in Table 1 Applicable Tanks List.

### Applicability Criteria

1. Outside phosphoric acid tanks with 20% or greater concentration.
2. Outside tanks that are part of the Acid Value Recovery System.
3. Outside tanks that are part of the SPA Recovery system.

These tanks are typically inspected during scheduled cleaning events and periodically using the following criteria as a guide.

The general inspection schedule for tanks are as follows:

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- Internal tank inspections are performed utilizing API 653 recommended procedures and inspection frequencies (5-10 years) as a guideline but are typically inspected more frequently during scheduled tank cleanings (1-3 years).
- External tank inspections are performed utilizing API 653 recommended procedures and inspection frequencies (5 years) as a guideline but are typically inspected more frequently during scheduled tank cleanings (1-3 years).
- Internal and external NDE / NDT inspections are conducted at recommended intervals (5-10 years) utilizing API 653 as a reference.
- External visual inspections are conducted annually utilizing API 653 as a reference.

Many of the storage tanks covered by this Program are rubber lined or coated preventing dye penetrant and ultrasonic thickness testing of the floor as described in API 653. Internal inspections of the tank do include a visual inspection, durometer testing of rubber, and/or spark testing of the rubber as the cleanliness of the rubber or coating allows. Removing minor amounts of hard scale from rubber lining or coating systems to allow for NDE/NDT internal inspections, has the potential to cause more damage to the lining or coating than the NDE/NDT may prevent, making a visual internal inspection the more prudent choice in these situations.

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Table 1: Applicable Tanks List

<u>Tank/Equipment Name</u>	Tank No.	Type of Service Phos Acid (%)	Area
#1 Reactor	MR-1202	28	Phosphoric Acid
#2 Reactor	MR-1252	28	Phosphoric Acid
#1 28% Clarifier	MF-1501	28	Phosphoric Acid
#2 28% Clarifier	MF-1503	28	Phosphoric Acid
#1 28% Storage Tank	MF-1502	28	Phosphoric Acid
#2 28% Storage Tank	MF-1514	28	Phosphoric Acid
#3 28% Storage Tank	MF-1504	28	Phosphoric Acid
44% Clarifier Tank	MF-6551	44	Phosphoric Acid
44%/54% Sludge Tank	MF-6508	44/54 Sludge	Phosphoric Acid
54% Clarifier Tank	MF-6503	54	Phosphoric Acid
44% Storage Tank	MF-6552	44	Phosphoric Acid
54% Storage Tank	MF-6504	54	Phosphoric Acid
Sludge Pre-Mix Tank	MF-1509	44/54/SPA Sludge	Phosphoric Acid
#1 Aging Tank	MF-2788	69	SPA Plant
#2 Aging Tank	MF-2773	69	SPA Plant
#3 Aging Tank	MF-2751	69	SPA Plant
SPA Filtrate Receiver Tank	MS-2758	69	SPA Plant
SPA Sludge Tank	MF-2754	SPA Sludge	SPA Plant
SPA Shipping Tank A	MF-2759A	69	Shipping
SPA Shipping Tank B	MF-2759B	69	Shipping
54% Shipping Storage Tank	MF-2503	54	Shipping
54% Shipping Clarifier	MF-1507	54	Shipping
Granulation Mix Tank	MF-1621	44/54/SPA Sludge	Granulation
Granulation Feed Tank	MF-1610	44/54/SPA Sludge	Granulation

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### III. INSPECTION DOCUMENTATION

All tank inspection records are kept in the maintenance inspection department. In general, the inspection reports and supporting documentation are filed in the corresponding tank records and the two most recent inspection reports are retained for reference and verification purposes.

Results from the sump and pad inspections must be recorded on the appropriate inspection form. The area operations sump and secondary containment inspections are recorded by the sump and pad team that is performing the inspections on the *Operations Sump and Secondary Containment Inspection Form* (see Attachment V).

The sump and pad team representative must completely and accurately fill out the applicable inspection form(s). They must also submit any liquid samples to the analytical lab for analysis and the lab technician will put the results in the lab database. After the inspection is complete, the forms must be submitted to the production manager for approval. The production manager must follow up on any work order and record any lab analysis results on the applicable sump inspection form.

The production manager will keep one copy of the inspection report for his/her file and forward the remaining copies to the environmental department to have a copy for their record keeping purposes.

If a concern noted during the inspection relates to the integrity or functionality of a Process Sump system, immediate notification must be made to the production manager. The discrepancy must be documented on the inspection form and a list of corrective actions must be included in the “Comments” section of the form.

When a work order is written to correct the discrepancy, the work order number and the date the work order was issued must be documented in the “Comments” section of the inspection form.



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#### **IV. ENVIRONMENTAL MANAGEMENT**

The plant manager and/or environmental manager must be available to assist operations and maintenance personnel in the management of this program. The environmental department will review the inspection forms and will generate an electronic summary of the inspections. The summary will be distributed quarterly to the operations, inspections and engineering departments. The Rock Springs plant sump and pad team will review this summary.

##### **A. Quarterly Summary**

The summary will be used to ensure that all pad and sump integrity concerns are addressed and funds allocated to maintain sumps and pads. The plant management team will coordinate with area production managers as well as maintenance and engineering to ensure that sump and pad projects are completed. The environmental department will provide characterization and disposal support to maintenance and engineering when planning sump or pad projects. A work order, management of change, and/or capital improvement project will be completed by appropriate personnel to address issues found during inspections.

The environmental department will retain all sump and pad reports for 2 years.

##### **B. Program Review**

The sump and pad team will ensure an annual review of this Program is conducted and verify that the written plan reflects the current management system.

The environmental department will keep a plant map identifying the location of all process sumps and pads (see Attachment IV). The environmental department will also maintain a file that identifies potential inputs into area process sumps and pads and the associated location where these input materials are reclaimed in the process (see Attachment III).

Area production managers and the engineering department will be responsible for ensuring that the environmental department is aware of any changes in area processes, sumps or pads that may change the input or location of recovery in the process.

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## **V. TRAINING**

Level I training will be implemented by the Rock Springs plant training coordinators for new operators in an applicable plant area. The environmental department will assist the Rock Springs plant training coordinators with this training and the training coordinators will maintain all associated training records.

Level II specialized training on the process sump and pad management program will be given to all personnel who will be involved in the inspection program. Level II training will be provided by the environmental department and will include specific inspection training for each sump and pad.

Specialized training will be given to storage tank inspectors within the inspections department. This training will involve training on visual and other relevant inspection techniques and known damage mechanisms for the tanks being inspected.

The environmental manager will be responsible for ensuring that the plant management team and environmental department personnel have reviewed and understand their responsibilities related to this Program.

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## VI. DEFINITIONS

**Shift Supervisor:** North or South plant supervisor on each crew.

**Process Liquid:** A liquid consisting of Process Wastewater, SACS, FSA, phosphoric acid, Acid Value Recovery System Effluent, non-hazardous aqueous solutions, and/or spills/leaks of phosphoric acid, sulfuric acid, and/or FSA.

**Process Sump:** Any pit, reservoir, trough, trench, containment structure, or drainage control system that serves to collect Process Liquids for utilization in the process.

## Inspections and Integrity of Tanks, Sumps, and Secondary Containment Attachment I

PROCESS SUMP AND PAD LIST		
Area	Sump/Pad Name	Inspected
Phosphoric Acid	MT-1308 Evaporator Barometric Water Return Sump	
	MT-1311 #1 Filter Acid Sump	
	MT-1315 #1 Tank Farm Sump	
	Storm Collection System Sump	
	J-1251 #2 Reactor Sump	
	J-6401 D/E Evaporators Area Acid Sump	
	J-6501 #2 Tank Farm Sump	
	J-6352 #3 Filter Acid Sump	
	J-6301 Mustang FSR Water Collection Sump	
	J-6302 #2 Filter Acid Sump	
	J-1319 FSR Collection Sump	
	MT-2772 C Evaporator Acid Sump	
	MT-2703 C Evaporator Barometric Sump	
SPA Plant	GS-2787 Repulp Sump	
	MF-2770 SPA Acid Sump	
Ore Receiving/ Water Reclaim	Recovery Sump	
	Rock Slurry Sump	
	1-Q-1 Rock Receiving Building Sump	
	Sewage System Sump	
Sulfuric Acid	T-113 Absorber Building Sump & Trench	
	PP-1201 A&S Sump and Containment Area	
	PP-1214 Sump and Containment Area	
	P-182 A&S Containment Area	
	MEC Acid Sump Trench	
	T-116 Water Pretreatment Building Sump and Trench	
	T-115 Sulfuric Containment Pad	
	Sulfur Truck Unloading Pit	
	T-220 Water Treatment Building Sump and Trench	
Granulation	Granulation Sump	
Shipping	MF-2504 Car Wash Sump	
	Sulfuric Truck Loading/Unloading	
	Sulfur Truck Unloading Pit	
	Sulfur Pit	
	MF-2777 SPA Shipping Tank Sump	
	Sulfuric Railcar Sump Track #7	
	Intermediate Sulfur Loading/Unloading Pit	

## Inspections and Integrity of Tanks, Sumps, and Secondary Containment Attachment II

PROCESS SUMP AND PAD DETAILS				
AREA	SUMP/PAD NAME	SECONDARY CONTAINMENT	# OF LEAK DETECTION PORTS	JDE NUMBER
Phosphoric Acid	MT-1308 Evaporator Barometric Water Return Sump	yes	1	MT-1308
	MT-1311 #1 Filter Acid Sump	yes	1	MT-1311
	MT-1315 #1 Tank Farm Sump	yes	1	MT-1315
	Storm Collection System Sump	no		GZ-4106
	J-1251 #2 Reactor Sump	yes	1	J-1251
	J-6401 D/E Evaporators Area Acid Sump	yes	1	J-6401
	J-6501 #2 Tank Farm Sump	yes	1	J-6501
	J-6352 #3 Filter Acid Sump	yes	1	J-6352
	J-6301 Mustang FSR Water Collection Sump	no		J-6301
	J-6302 #2 Filter Acid Sump	yes	1	J-6302
	J-1319 FSR Collection Sump	yes	1	J-1319
	MT-2772 C Evaporator Acid Sump	no		MT-2772
	MT-2703 Evaporator Barometric Sump	yes	1	MT-2703
SPA Plant	GS-2787 Repulp Sump	no		GS-2787
	MF-2770 SPA Acid Sump	no		MF-2770
Ore Receiving/ Water Reclaim	Recovery Sump	no		J-1104
	Rock Slurry Sump	no		J-1107
	1-Q-1 Rock Receiving Building Sump	no		1-Q-1
	Sewage System Sump	no		GZ-4101
Sulfuric Acid	T-113 Absorber Building Sump & Trench	no	2	T-113
	PP-1201 A&S Sump and Containment Area	no		T-1200A
	PP-1214 Sump and Containment Area	no		T-1214
	P-182 A&S Containment Area	no		T-182S
	MEC Acid Sump Trench	no		MT-82514
	Temporary Sulfur Unloading Pit	No		T-108C
	T-115 Sulfuric Containment Pad	No		T-1214
	T-116 Water Pretreatment Building Sump and Trench	no		T-116
Granulation	T-220 Water Treatment Building Sump and Trench	no		T-220
	Granulation Sump	yes	1	MF-1623
Shipping	MF-2504 Car Wash Sump	yes	1	MF-2504
	Sulfuric Truck Loading/Unloading	no		T-1200B
	Sulfur Truck Unloading Pit	no		T-117
	Sulfur Pit	no		T-107
	MF-2777 SPA Shipping Tank Sump	no		MF-2777
	Sulfuric Railcar Sump Track #7	no		T-1200C
	Intermediate Sulfur Loading/Unloading Pit	no		T-108

**Inspections and Integrity of Tanks, Sumps, and Secondary Containment  
Attachment III**

<b>PROCESS SUMP/PAD INPUT MATERIALS AND RECLAIM LOCATION</b>				
<b>AREA</b>	<b>SUMP/PAD NAME</b>	<b>TYPICAL INPUT MATERIALS</b>	<b>MATERIALS RECLAIM LOCATION/PROCESS</b>	<b>TYPICAL LAB ANALYSIS</b>
<b>Phosphoric Acid</b>	MT-1308 Evaporator Barometric Water Return Sump	phosphoric acid, condensate	Blend Tank	pH, P205
	MT-1311 #1 Filter Acid Sump	phosphoric acid, process water	#1 Filter Gyp Slurry Tank, #1 Tank Farm Sump	pH, P205
	MT-1315 #1 Tank Farm Sump	phosphoric acid, process water	Gyp Stack	pH, P205
	Storm Collection System Sump	Storm water	Containment Trench, #1 Tank Farm Sump	pH
	J-1251 #2 Reactor Sump	phosphoric acid, process water	#2 Filter Gypsum Slurry Tank	pH, P205
	J-6401 D/E Evaporators Area Acid Sump	phosphoric acid, process water	#2 Filter Gypsum Slurry Tank	pH, P205
	J-6501 #2 Tank Farm Sump	phosphoric acid, process water	#2 Filter Gypsum Slurry Tank, #3 Filter Gypsum Slurry Tank	pH, P205
	J-6352 #3 Filter Acid Sump	phosphoric acid, process water	#3 Filter Acid Sump	pH, P205
		Process water, phosphoric acid	#2 & #3 Filter Vacuum Pump Scrubbers, #2 Reactor Vacuum Pump, #3 Filter Vacuum Pump Seal Water, Fume Scrubbers, #2 Filter Gyp Slurry Tank	pH, P205
	J-6301 Mustang FSR Water Collection Sump	Process water, phosphoric acid	#2 Filter Gyp Slurry Tank	pH, P205
<b>SPA Plant</b>	J-6302 #2 Filter Acid Sump	phosphoric acid, process water	A/B Evap Secondary Scrubber, C-Evap Acid Cooler Tank, C-Evap FSA Reduc. Tank, #1 Filter Vacuum Scrubber	pH, P205
	J-1319 FSR Collection Sump	Process water, phosphoric acid	#1 28% Clarifier	pH, P205
	MT-2772 C Evaporator Acid Sump	Process water, phosphoric acid	C FSA Tank	pH, P205
	MT-2703 Evaporator Barometric Return Sump	Process water, phosphoric acid	Sludge Tank, Phos Pre-Mix Tank, Filter Feed Tanks	pH, P205
	GS-2787 Repulp Sump	Process water, phosphoric acid	Repulp Sump, Scrubber Water Tank, Hot Water Pond Line	pH, P205
	MF-2770 SPA Acid Sump	Process water, phosphoric acid	Rock Slurry Thickener Tank	pH, P205
	Recovery Sump	Ore	Rock Slurry Thickener Tank	pH, P205
	Rock Slurry Sump	Ore	Recovery Tank	pH, P205
	1-Q-1 Rock Receiving Building Sump	Ore		pH, P205
	Sewage System Sump	Raw Sewage, Sodium Hypochlorite	#1 Filter Gyp Slurry Tank	pH, Sulfuric Acid
<b>Ore Receiving/ Water Reclaim</b>	T-113 Absorber Building Sump & Trench	Sulfuric Acid		pH, Sulfuric Acid
	PP-1201 A&S Sump and Containment Area	Sulfuric Acid		pH, Sulfuric Acid
	PP-1214 Sump and Containment Area	Sulfuric Acid		pH, Sulfuric Acid
	P-182 A&S Containment Area	Sulfuric Acid		pH, Sulfuric Acid
	MEC Acid Sump Trench	Sulfuric Acid		pH, Sulfuric Acid
	Sulfur Truck Unloading Pit			
	T-116 Water Pretreatment Building Sump and Trench	Sulfuric Acid		pH, Sulfuric Acid
<b>Sulfuric Acid</b>	T-220 Water Treatment Building Sump and Trench	Sulfuric Acid		pH, Sulfuric Acid
	T-115 Sulfuric Containment Pad			pH, Sulfuric Acid



Simpliot Phosphates LLC  
A Utah Limited Liability Company  
ROCK SPRINGS, UT.

REVISIONS

DESCRIPTION

CHK. NO. BY DATE

REVISIONS

DESCRIPTION

CHK. NO. BY DATE

SCALE: 1"=150'

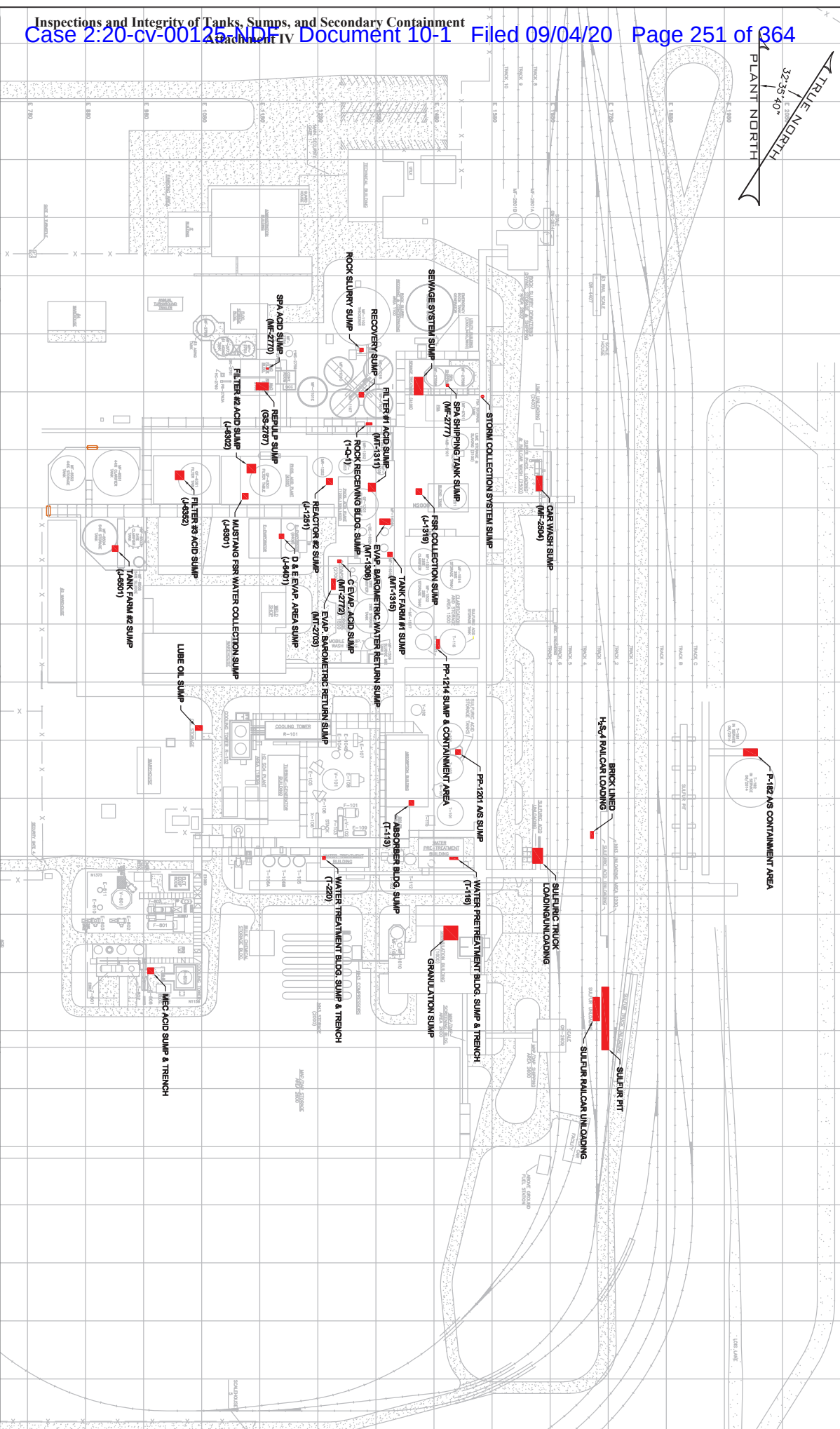
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REV.

SUMP & PAD TEAM  
PROCESS SUMP LOCATIONS  
GENERAL PLANT  
PLOT PLAN 2007



## Operations Quarterly Process Sump and Secondary Containment Inspection Form

Sump/Pad Name:		Inspection Date:			
Area:		Employee name:			
<b>I. Process Sump Inspection Items</b>					
Check each item after inspectin. If an item does not apply, write "N/A" in the check box. Make note of any leaks, defects, debris, holes, cracks, chips, pluggage, severe corrosion/erosion, or other problems in each observation section.					
<b>Inspection Item</b>		<b>Check</b>	<b>Observations</b>		
1	Pad(s)				
2	Process trenches leading to sump				
3	Process lines leading to and from sump				
4	Sump pump and motor				
5	Float switch/Level indicator				
6	Tanks and pumps leading to sump				
7	Leak detection on double walled sumps				
Additional Observations:					
<b>II. Secondary Containment and Leak Detection</b>					
Enter the requested information below. For those items that do not apply, write "N/A" in the space provided.					
1	Secondary Containment? (Y/N)		6	Liquid Pumped Out? (Y/N)	
2	Leak Detection Port? (Y/N)		7	Estimated Volume of Liquid: (Gallons)	
3	Liquid Found? (Y/N) - If		8	Sample submitted to lab? (Y/N)	
4	Measured Liquid Level: Inches		9	Sample results attached? (Y/N)	
5	Liquid Sample Taken? (Y/N)				
Additional Observations:					
Note: If liquid is found in secondary containment, the liquid must be pumped and sampled					
<b>III. Comments</b>					
Include all corrective actions, work order numbers, and other pertinent information that applies. Appropriate personnel to sign form once all applicable corrective actions have been completed.					
Comments:					
				Area Shift Supervisor	
				Area Superintendent	
				Environmental Department	





# Storage Tank External Inspection Checklist

Tank Name: \_\_\_\_\_ Equipment #: \_\_\_\_\_ Date: \_\_\_\_\_

Diameter: \_\_\_\_\_ Height: \_\_\_\_\_ Specific Gravity: \_\_\_\_\_

Floor Nominal: \_\_\_\_\_ Bottom Course Nominal: \_\_\_\_\_

T-min Floor: \_\_\_\_\_ T-min Bottom Course \_\_\_\_\_

Material of Const. Floor and Shell: \_\_\_\_\_ Type of Rubber Liner: \_\_\_\_\_

Inspector: \_\_\_\_\_

Name	License #	Signature	Date

Approved: \_\_\_\_\_

Name	Title	Signature	Date

## **Background:**

### **External Checklist:**

Inspection Item	Status	Comments
Is tank exterior free of leaks, corrosion or cracks?		
Is tank shell free of noticeable denting, distortions, buckling or bulging?		
Is exterior coating or paint in good working condition		
Is aboveground piping (valves, fittings, connections, pumps, etc.) free of visible leaks?		
Are ladders/platforms/walkways secure with no sign of damage?		
Concrete pad or ring wall free of cracking or spalling?		
Tank supports in satisfactory condition		
Are leak detection ports open and clean?		
Water able to drain away from tank?		
Grounding strap between tank and Foundation in good condition?		
Is containment structure in satisfactory condition?		
<b>Insulation</b>		
Inspection Item	Status	Comments
Free of missing insulation?		
Insulation free of noticeable areas of moisture?		

Insulation free of visible signs of damage?		
Insulation adequately protected from water intrusion?		

**Conclusion/Recommendations:**

Repair Items		
Item	Description	Repair Number
1		



**Figure 1-Repairs**

**Figure 2- Completed Repairs**



# Storage Tank Internal Inspection Checklist

Tank Name: \_\_\_\_\_ Equipment #: \_\_\_\_\_ Date: \_\_\_\_\_

Diameter: \_\_\_\_\_ Height: \_\_\_\_\_ Specific Gravity: \_\_\_\_\_

Floor Nominal: \_\_\_\_\_ Bottom Course Nominal: \_\_\_\_\_

T-min Floor: \_\_\_\_\_ T-min Bottom Course \_\_\_\_\_

Material of Const. Floor and Shell: \_\_\_\_\_ Type of Rubber Liner: \_\_\_\_\_

Inspector: \_\_\_\_\_

\_\_\_\_\_  
Name License # Signature Date

Approved: \_\_\_\_\_

\_\_\_\_\_  
Name Title Signature Date

## **Background:**

## **External Checklist:**

Inspection Item	Status	Comments
Is tank exterior free of leaks, corrosion or cracks?		
Is tank shell free of noticeable denting, distortions, buckling or bulging?		
Is exterior coating or paint in good working condition		
Is aboveground piping (valves, fittings, connections, pumps, etc.) free of visible leaks?		
Are ladders/platforms/walkways secure with no sign of damage?		
Concrete pad or ring wall free of cracking or spalling?		
Tank supports in satisfactory condition		
Are leak detection ports open and clean?		
Water able to drain away from tank?		
Grounding strap between tank and Foundation in good condition?		
Is containment structure in satisfactory condition?		
Insulation		
Inspection Item	Status	Comments
Free of missing insulation?		
Insulation free of noticeable areas of moisture?		

Insulation free of visible signs of damage?		
Insulation adequately protected from water intrusion?		

**Internal Checklist:**

Inspection Item	Status	Comments
Inspect the shell to floor weld		
Inspect the floor Lapp Welds		
Locate Voids under the floor		
Inspect all reinforcing pads under pipe supports		
Check floor for pitting and corrosion		
Inspect shell seam welds		
Inspect nozzle and manway to shell welds		
Inspect shell for pitting and corrosion		
Inspect Baffle to shell welds		
Inspect baffle supports		
Inspect baffles for thinning and corrosion		
Inspect mixer blades and shaft		
Inspect mixer bolts		
Inspect mixer hub and key way		
<b>Rubber Liner</b>		
Inspection Item	Status	Comments
Visually inspect coating adhesion		
Visually inspect for tears or delamination		
Durometer on Rubber Lining		

**Conclusion/Recommendations:**

Repair Items		
Item	Description	Repair Number
1		

**Figure 1-Repairs**

**Figure 2- Completed Repairs**

## Appendix 6

### RCRA Project Narrative and Compliance Schedule



Appendix 6  
RCRA Project Narrative & Compliance Schedule  
Rock Springs

Final

May 15, 2020





**RCRA Project Narrative & Compliance Schedule  
Simplot Rock Springs**

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The following project timelines provide a general plan for completion of the compliance projects ("Compliance Projects") required by the Consent Decree. The length of time required is influenced by engineering requirements, permitting and approvals, equipment lead times, a limited seasonal construction window, coordination with plant turnarounds, training development, and coordination with employee work schedules.

## **1 Project 1: Acid Value Recovery & Wash Solution System in Phosphoric Acid Plant**

The Acid Value Recovery System and wash solution system in the phosphoric acid plant ("Phosphoric Acid Plant") project will install new tank(s) and/or modify an existing tank, pumps, piping and controls to enable Simplot to recover the value of cleaning wastes or other materials as designated in the Facility Report. In addition, the Acid Value Recovery System will enable Simplot to recover spills and leaks in containable impervious areas and semi-segregable areas. The Acid Value Recovery System effluent must be reused as identified in the Facility Report.

**Milestones:** The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- |   |          |
|---|----------|
| • Engineering/Development of project                  | month 16 |
| • Permitting with Regulatory Agency                   | month 28 |
| • Detailed Design                                     | month 30 |
| • Project Approval                                    | month 33 |
| • Initiate Field Construction (site prep, foundation) | month 38 |
| • Tank Fabrication Initiated                          | month 47 |
| • Tank Fabrication Completion                         | month 57 |

**Completion:** The following dates are enforceable dates upon which, following the date of Simplot's signature of the Consent Decree, Simplot must complete construction and implement Project 1:

- |   |          |
|---|----------|
| • Project Completion                                | month 66 |
| • Start-up and Documentation of Training Completion | month 70 |



## **2 Project 2: Recovery System Return Piping**

The recovery system return piping ("Recovery System Return Piping") project will install new piping to enable Simplot to: (1) clean phosphoric acid lines from the Phosphoric Acid Plant up to Granulation and SPA and return those cleaning wastes or other materials to the Acid Value Recovery System; (2) clean SPA Recovery Units and Acid Value Recovery Units and return those cleaning wastes or other materials to the Acid Value Recovery System and/or direct to Upstream Operations/Mixed-Use Units ; (3) clean the FSA system and return those cleaning wastes or other materials to the Acid Value Recovery System; (4) recover other materials from SPA Recovery Units and Acid Value Recovery Units and return those materials to the Acid Value Recovery System or direct to Upstream Operations/Mixed-Use Units as designated in the Facility Report and/or direct to Granulation; and (5) recover high acid content material from semi-segregable sumps to the Acid Value Recovery Tank and/or to a phosphoric acid storage tank as designated in the Facility Report. Upon completion, the Recovery System Return Piping will be operated in association with the Acid Value Recovery System as identified in the Facility Report.

**Milestones:** The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- |                                      |          |
|--------------------------------------|----------|
| • Engineering/Development of project | month 16 |
| • Detailed Design                    | month 30 |
| • Project Approval                   | month 33 |
| • Initiate Field Construction        | month 38 |

**Completion:** The following dates are enforceable dates upon which, following the date of lodging the Consent Decree, Simplot must complete construction and implement Project 2:

- |   |          |
|---|----------|
| • Project Completion                                | month 66 |
| • Start-up and Documentation of Training Completion | month 70 |

## **3 Project 3: Granulation Recovery & Wash Solution System in Granulation Plant**

The Granulation Recovery System and wash solution system in the Granulation plant is already installed and operational at the Simplot Rock Springs Facility.



#### 4 Project 4: Upgrade Granulation Plant Pads and Sumps as Needed

Simplot will modify or install, as needed, containment pads and sumps in the Granulation plant to improve the capture of spills, leaks, and cleaning solution so materials may be returned to the Granulation process via the Granulation Recovery System, as identified in the Facility Report. During the initial baseline performance period described in Appendix 5.A, Simplot will evaluate if improvements are needed for Granulation plant containment pads and sumps.

Milestones: The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- Review of existing spill/leak capture month 0
- Decision if upgrades needed month 12

The following milestones apply only if it is decided upgrades are needed:

- Engineering/Development of project, if needed month 24
- Permitting with Regulatory Agency month 36
- Detailed Design month 42
- Project Approval month 45
- Initiate Field Construction month 50
- Project Completion month 64

#### 5 Project 5: Relocate Lime Slaker

The lime slaker system is currently located in a prime location for Acid Value Recovery Units to facilitate segregated recovery of wash and spill/leak material. The lime slaker will be relocated in order to free up the space for other tanks to be located in this area. The lime slaker will be located outside of any Phosphoric Acid Plant sump collection areas.

Milestones: The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- Engineering/Development of project month 6
- Detailed Design month 12
- Project Approval month 15
- Initiate Field Construction month 20

Completion: The following dates are enforceable dates upon which, following the date of Simplot's signature of the Consent Decree, Simplot must complete construction and implement Project 5:

- Project Completion month 32
- Start-up and Documentation of Training Completion month 36



## **6 Project 6: Relocate 54% Shipping Clarifier & 54% Shipping Tank**

The 54% Shipping Clarifier and the 54% Shipping Tank will be relocated or new tanks will be built in a new location and the old tanks will be demolished. The two tanks will be located near the FSA Storage Tank. These tanks will be placed within a newly built, secondary impervious containment area. All associated pumps and piping will also be relocated to the new tank location. The transfer line from the 54% Shipping Tank to rail and truck loadout that is identified in Figure 9 and Table 4 of the Facility Report will be re-routed and shortened due to the tank relocation. The new transfer piping configuration will be similar to the FSA to Truck and Rail Loadout Transfer Line shown in Figure 10 of the Facility Report. This project allows for the segregation of the Acid Value Recovery designated tank away from the #1 Tank Farm semi-segregable area. Once the existing tanks have been removed the containment for the area will be rebuilt.

**Milestones:** The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- |   |          |
|---|----------|
| • Engineering/Development of project                  | month 12 |
| • Permitting with Regulatory Agency                   | month 24 |
| • Detailed Design                                     | month 30 |
| • Project Approval                                    | month 33 |
| • Initiate Field Construction (site prep, foundation) | month 37 |
| • Tank Fabrication/Relocation Initiated               | month 47 |
| • Tank Fabrication/Relocation Completion              | month 55 |
| • Containment Rebuild                                 | month 65 |

**Completion:** The following dates are enforceable dates upon which, following the date of Simplot's signature of the Consent Decree, Simplot must complete construction and implement Project 6:

- |   |          |
|---|----------|
| • Project Completion                                | month 66 |
| • Start-up and Documentation of Training Completion | month 70 |



## **7 Project 7: Relocate Sulfuric Storage Tank (T-115)**

The Sulfuric Storage Tank (T-115) will be relocated or a new tank will be built in a new location. The Sulfuric Storage Tank will be located near the T-104 Sulfuric Acid Storage Tank, removing all sulfuric acid storage tanks from the #1 Tank Farm semi-segregable area. All associated pumps and piping will also be relocated with the new tank location.

Milestones: The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- |   |          |
|---|----------|
| • Engineering/Development of project                  | month 12 |
| • Permitting with Regulatory Agency                   | month 24 |
| • Detailed Design                                     | month 30 |
| • Project Approval                                    | month 33 |
| • Initiate Field Construction (site prep, foundation) | month 37 |
| • Tank Fabrication/Relocation Initiated               | month 47 |
| • Tank Fabrication/Relocation Completion              | month 55 |

Completion: The following dates are enforceable dates upon which, following the date of Simplot's signature of the Consent Decree, Simplot must complete construction and implement Project 7:

- |   |          |
|---|----------|
| • Project Completion                                | month 66 |
| • Start-up and Documentation of Training Completion | month 70 |

## **8 Project 8: BMP Training**

Site-specific RCRA and BMP training will be developed and implemented for all affected employees, maintenance personnel, and contractors in the Phosphoric Acid and Granulation plants, along with Facility management, and others who manage waste streams covered by the CD.

Milestones: The following milestones provide a general plan for the start of each phase counting from the date of Simplot's signature of the Consent Decree:

- |                     |         |
|---------------------|---------|
| • Develop Training  | month 0 |
| • Initiate Training | month 3 |

Completion: The following dates are enforceable dates upon which, following the date of Simplot's signature of the Consent Decree, Simplot must complete construction and implement Project 8:

- |                       |         |
|-----------------------|---------|
| • Training Completion | month 9 |
|-----------------------|---------|

## Appendix 7

### Alternative Liner Demonstration

## APPENDIX 7

# PHOSPHOGYPSUM STACK SYSTEM ALTERNATIVE LINER REQUIREMENTS

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### Simplot Rock Springs Wyoming

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Appendix 1 of this Consent Decree sets forth requirements for lining the Phosphogypsum Stack System within five years of the Effective Date of this Consent Decree as a means of reducing or eliminating contamination migrating from such Phosphogypsum Stack System. The Phosphogypsum Stack System at the Rock Springs Facility was permitted by the State of Wyoming and built with a synthetic liner. Expansions of the Phosphogypsum Stack have been and continue to be subject to approval by the State of Wyoming, under Chapters 3 and 11 of the Wyoming Water Quality Rules and Regulations. The most recent permit for expansion of the Phosphogypsum Stack is found in Appendix 7, Attachment A.

This Appendix identifies the specific Phosphogypsum Stack System or Components thereof that, subject to the terms of the Consent Decree (including Paragraph 25(a) and (b)), EPA has determined either meet the Liner design standards of Appendix 1.B. Section VI, or are considered an acceptable alternative to those standards. Attachment B of this Appendix shows the impoundments at the Rock Springs Facility, including those impoundments that are considered Components of the Phosphogypsum Stack System. These impoundments (Figure 3) are:

#### Phosphogypsum Stack

The existing Phosphogypsum Stack has a lining system consisting of a 16 oz. non-woven polypropylene geotextile overlaid on the graded and compacted soil surface with an 60 or 80 mil thick high density polyethylene (HDPE) Liner installed over the geotextile. For the expansions of the Phosphogypsum Stack that have been done, the new Liner is double-fused to the existing Liner and continuously double-fused together for the entire surface area to form an impermeable barrier to leakage.

#### Return Pond

The Return Pond is a Component of the Phosphogypsum Stack System. Process Wastewater from the Phosphogypsum Stack decants/flows into the Return Pond, from there it is returned to the phosphoric acid manufacturing process. The Return Pond, like the Phosphogypsum Stack, has a lining system of non-woven polypropylene geotextile overlaid on the graded and compacted soil surface with an 80 mil thick HDPE.



#### Auxiliary Fresh Water Storage Pond

This HPDE lined (60-mil.) pond holds fresh water for use in the phosphoric acid manufacturing process. No Process Wastewater is kept in this pond and this pond is not a Component of the Phosphogypsum Stack System.

#### Fresh Water Cooling Pond

This HPDE lined pond holds cooling water from indirect heat exchangers in the phosphoric acid manufacturing process. No Process Wastewater is kept in this pond and this pond is not a Component of the Phosphogypsum Stack System.

On November 14, 2019, Simplot submitted a document to EPA titled "Alternative Liner Demonstration, Expansion of the Rock Springs Phosphogypsum Stack System, J.R. Simplot Company, Rock Springs, Wyoming" (Attachment C of this Appendix, or "Demonstration Report"). This Demonstration Report has an alternate means of meeting the liner requirements in Appendix 1.B and Paragraph 25(b) of the Consent Decree for the expansion of the existing Phosphogypsum Stack or the construction of a new Phosphogypsum Stack. EPA's acceptance of the Demonstration Report for this purpose does not necessarily bind the EPA to the factual assertions and conclusions of the Demonstration Report.

Wyoming Department of Environmental Quality  
Water Quality Division  
PERMIT TO CONSTRUCT

**PERMIT NO. 18-365**

**RE: Simplot Phosphates, LLC – Phosphogypsum Stack Area Expansion - Sweetwater County,  
Sections 8, 9 and 16, T18N, R104W, Lat: 41.547778, Long:-109.149722**

This permit hereby authorizes the permittee Bret Pizzato, Simplot Phosphates, LLC, 515 South Highway 430, Rock Springs, WY 82901 to construct the first phase of a phosphogypsum stack disposal area expansion consisting of about 180 acres of clearing and grubbing, grading, and earthwork operations according to the procedures and conditions of this permit. The facility is located at the legal description and latitude/longitude listed above about 4.5 miles southeast of the City of Rock Springs, WY in Sweetwater County, in the State of Wyoming. Complete all construction, installation, or modification allowed by this permit by January 18, 2024.

The issuance of this permit confirms that the Wyoming Department of Environmental Quality (DEQ) Water Quality Division (WQD) has evaluated the application submitted by the permittee and determined that it meets minimum applicable construction and design standards. The compliance with construction standards and the operation and maintenance of the facility to meet the engineer's design are the responsibility of the permittee, owner, and operator.

Granting this permit does not imply that WQD guarantees or ensures that the permitted facility, when constructed, will meet applicable discharge permit conditions or other effluent or operational requirements. Compliance with discharge standards remains the responsibility of the permittee.

Nothing in this permit constitutes an endorsement by WQD of the construction or the design of the facility described herein. This permit verifies only that the submitted application meets the design and construction standards imposed by Wyoming statutes, rules and regulations. The DEQ assumes no liability for, and does not in any way guarantee or warrant the performance or operation of the permitted facility. The permittee, owner and operator are solely responsible for any liability arising from the construction or operation of the permitted facility. By issuing this permit, the State of Wyoming does not waive its sovereign immunity.

The permittee shall allow DEQ personnel and their invitees to enter the premises where the facility is located, or where records are kept under the conditions of this permit, and collect resource data as defined by Wyoming Statute § 6-3-414, inspect and photograph the facility, collect samples for analysis, review records, and perform any other function authorized by law or regulation. The permittee shall secure and maintain such access for the duration of the permit.

If the facility is located on property not owned by the permittee, the permittee shall also secure and maintain from the landowner upon whose property the facility is located permission for DEQ personnel and their invitees to enter the premises where a regulated facility is located, or where records are kept under the conditions of this permit, and collect resource data as defined by Wyoming Statute § 6-3-414, inspect and photograph the facility, collect samples for analysis, review records, and perform any other function authorized by law. The permittee shall secure and maintain such access for the duration of the permit.

If the facility cannot be directly accessed using public roads, the permittee shall also secure and maintain permission for DEQ personnel and their invitees to enter and cross all properties necessary to access the facility. The permittee shall secure and maintain such access for the duration of the permit.

The permittee shall maintain in its records documentation that demonstrates that the permittee has secured permission for DEQ personnel and their invitees to access the permitted facility, including (i) permission to access the land where the facility is located, (ii) permission to collect resource data as defined by Wyoming Statute § 6-3-414, and (iii) permission to enter and cross all properties necessary to access the facility if the facility cannot be directly accessed from a public road. The permittee shall also maintain in its records a current map of the access route(s) to the facility and contact information for the owners or agents of all properties that must be crossed to access the facility. The permittee shall ensure that the documentation, map, and contact information are current at all times. The permittee shall provide the documentation, map, and contact information to DEQ personnel upon request. On closure of a facility, the permittee shall maintain such records for a period of five (5) years.

Nothing in this permit precludes the institution of any legal action or other proceeding to enforce any applicable provision of law or rules and regulations. It is the duty of the permittee, owner and operator to comply with all applicable federal, state and local laws or regulations in the exercise of its activities authorized by this permit.

The issuance of this permit does not convey any property rights in either real or personal property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

The permittee shall construct and operate the permitted facility in accordance with the statements, representations, procedures, terms and conditions of the permit application, supporting documents and permit. This permit does not relieve the permittee from any duty to obtain any other permit or authorization that may be required by any provision of federal, state or local laws.

**In carrying out its activities authorized by this permit, the permittee, owner and operator shall comply with all of the following permit conditions:**

1 of 4. The permittee will immediately notify WQD of any changes or modifications, which are not consistent with the terms and conditions of this permit. Submit oral or written notice to the Wyoming Water Division, Southwest District Engineer, mark.baron@wyo.gov, 510 Meadow View Drive, Lander, WY 82520, 307-332-3144, 307-332-7726 (fax), in accordance with the provisions of Section 11, Chapter 3, Wyoming Water Quality Rules and Regulations

2 of 4. The permittee will submit a Certificate of Completion signed by the engineer of record or the owner to the engineer listed above within sixty (60) days of completing the construction of the authorized facility. A form titled "Certificate of Completion" is available on the WQD Construction Permitting website.

3 of 4. DEQ bases the review and approval of this permit upon the items identified in the attached "Statement of Basis".

4 of 4. This facility is permitted to only receive phosphogypsum wastewater and waste solids from Simplot Phosphates.

AUTHORIZED BY:

  
 Kevin Frederick, Administrator  
 Water Quality Division

  
 Todd Parfitt, Director  
 Department of Environmental Quality

February 4, 2019  
 Date of Issuance

TP/KF/RRC/MDB/SG

## STATEMENT OF BASIS

1. Permit Number: 18-365
2. Application reviewed for compliance with the following regulations:  
Chapters 3 and 11 of the Wyoming Water Quality Rules and Regulations.
3. Does the permit comply with all the applicable regulations identified above?

Yes

The proposed phosphogypsum stack area expansion is to be constructed in phases. This Permit to Construct, covers the first phase of construction which consists of preparing the 180 acre site for the installation of a synthetic liner. The second phase of construction will consist of the installation of either an 80 mil high density polyethylene liner or an 80 mill linear low density polyethylene liner.

4. If a Chapter 3, Section 17 review is required, indicate how WQD will determine that the permittee will protect groundwater quality.

A Chapter 3, Section 17 review is required. Chapter 3, Section 17 (a) states that – Documentation that the facility poses no threat of discharge to groundwater. If an applicant proposes a facility of this nature and can provide the documentation, a subsurface investigation is not required. The documentation shall consist of data which demonstrates that: (i) Facility construction will not allow a discharge to groundwater by direct or indirect discharge, percolation or filtration. Under the second phase of construction the installation of a either an 80 mil high density polyethylene liner or an 80 mill linear low density polyethylene liner between the phosphogypsum stack and the underlining soil will protect the groundwater quality.

Permits to Construct 06-606, 97-094, 95-041, 90-121, 86-123 and 85-075 cover the existing phosphogypsum stack construction and groundwater monitoring. Currently four groundwater monitoring wells near the phosphogypsum storage area are sampled and tested for various constituents quarterly (the water level in monitoring well B1 is generally too low to sample). The test results from the quarterly sampling are mailed to the Lander WDEQ Office.

A second set of groundwater monitoring wells have been constructed through a Permit by rule. It has been suggested to Simplot that an updated monitoring program include both the older groundwater monitoring wells and new monitoring wells. The new groundwater monitoring wells came about as part of an Administrative Order on Consent between Simplot Phosphates and the USEPA. In July 2012, after the RCRA 3013 AOC (Docket No. RCRA 08-2012-0004) was signed, groundwater monitoring was expanded to all six existing functional groundwater monitoring wells: PZ-B2, PZ-B3, PZ-B4, PZ-B6, PZ-B8, and PZ-B9 (PZ-B1 has not contained sufficient water to sample since March 1987). Additional groundwater investigation was conducted under the RCRA 3013 AOC from June to September 2013 and included the drilling, installation and sampling of 39 new monitoring wells at 15 boring locations around the facility along with the collection of soil, sediment, surface water and groundwater samples. These data results are described in detail in the Sampling and Analysis Report (Formation, 2014).

5. Documentation of Statement of Basis: The archive file for this permit includes adequate documentation of all sections of this Statement of Basis.

### CERTIFICATION

DEQ issued this permit is based upon a review of the application package submitted in accordance with the requirements of Chapter 3, Section 6, Wyoming Water Quality Rules and Regulations. Mark D. Baron, P.E., [mark.baron@wyo.gov](mailto:mark.baron@wyo.gov), Southwest District Engineer, completed this review on January 18, 2019. DEQ recommends issuing this permit based upon the statements, representations and procedures presented in the permit application and supporting documents, permit conditions, and the items identified in this "Statement of Basis."

XC: Daniel Kennedy, P.E., JFC Engineers & Surveyors, P.O. Box 2026, Rock Springs, WY 82901

PDF: [mark.baron@wyo.gov](mailto:mark.baron@wyo.gov) (Subject Line - Permit to Construct – 18-365 – Simplot Phosphogypsum Area Expansion – Sweetwater County)





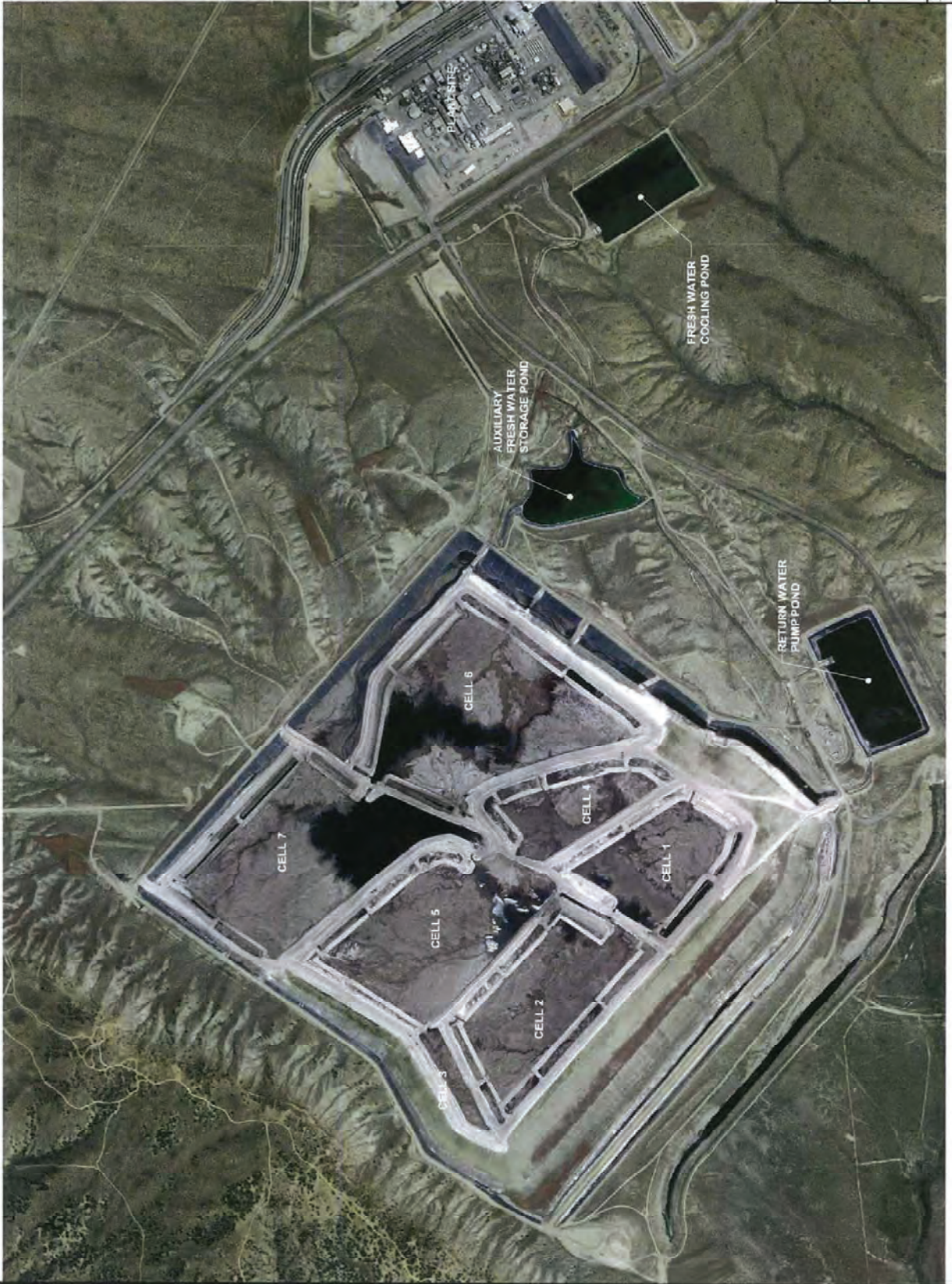








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IMAGE DATE: JUNE 24, 2017  
SOURCE: GOOGLE EARTH



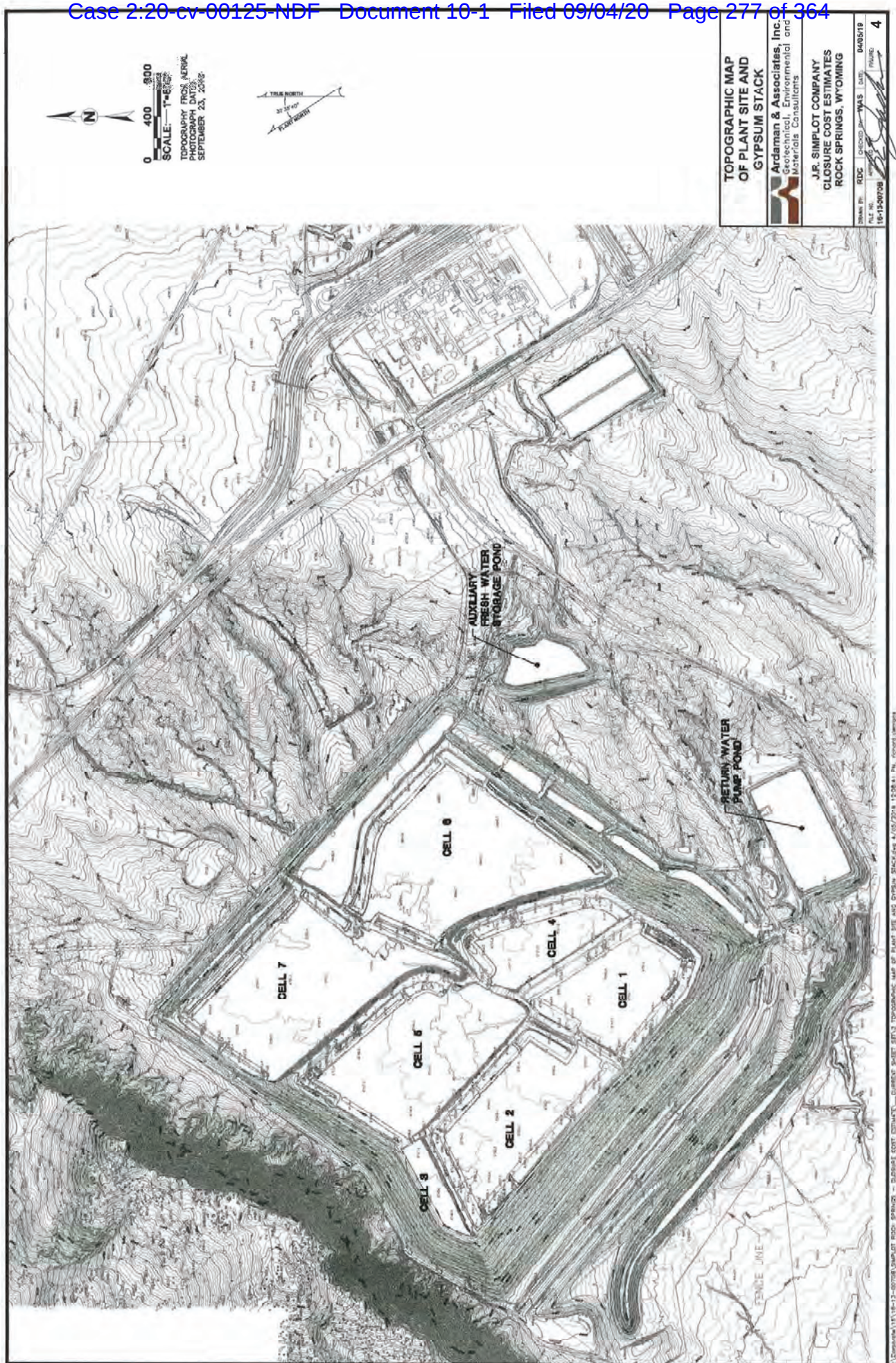
**AERIAL PHOTOGRAPH  
OF PHOSPHOGYPSUM  
STACK SYSTEM**

**Ardaman & Associates, Inc.**  
Geotechnical, Environmental and  
Materials Consultants

**J.P. SIMPLOT COMPANY**  
CLOSURE COST ESTIMATES  
ROCK SPRINGS, WYOMING

Drawn By: RDC Date: 06/20/2018 WKS: 040519  
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Sheet: 3

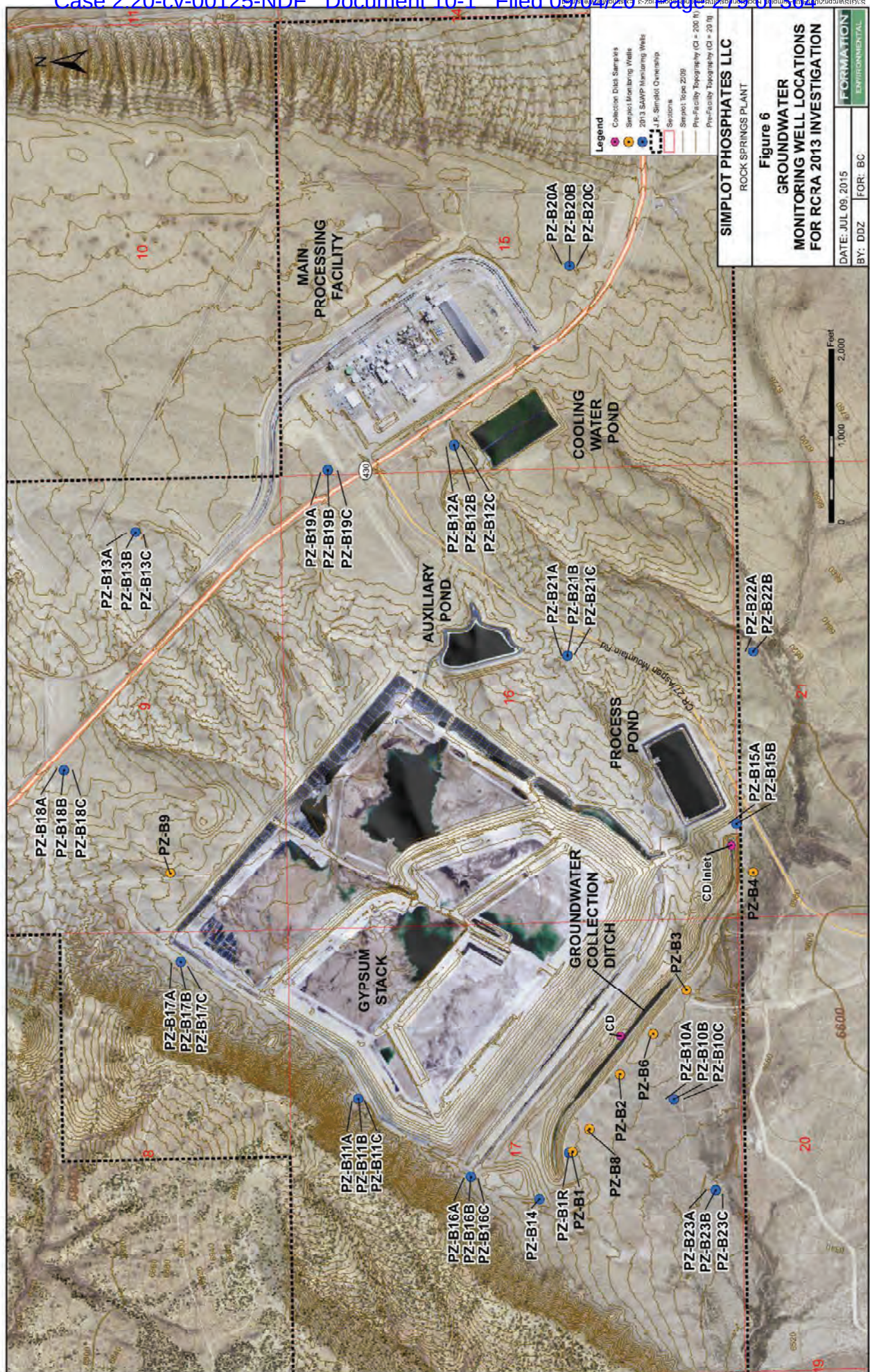














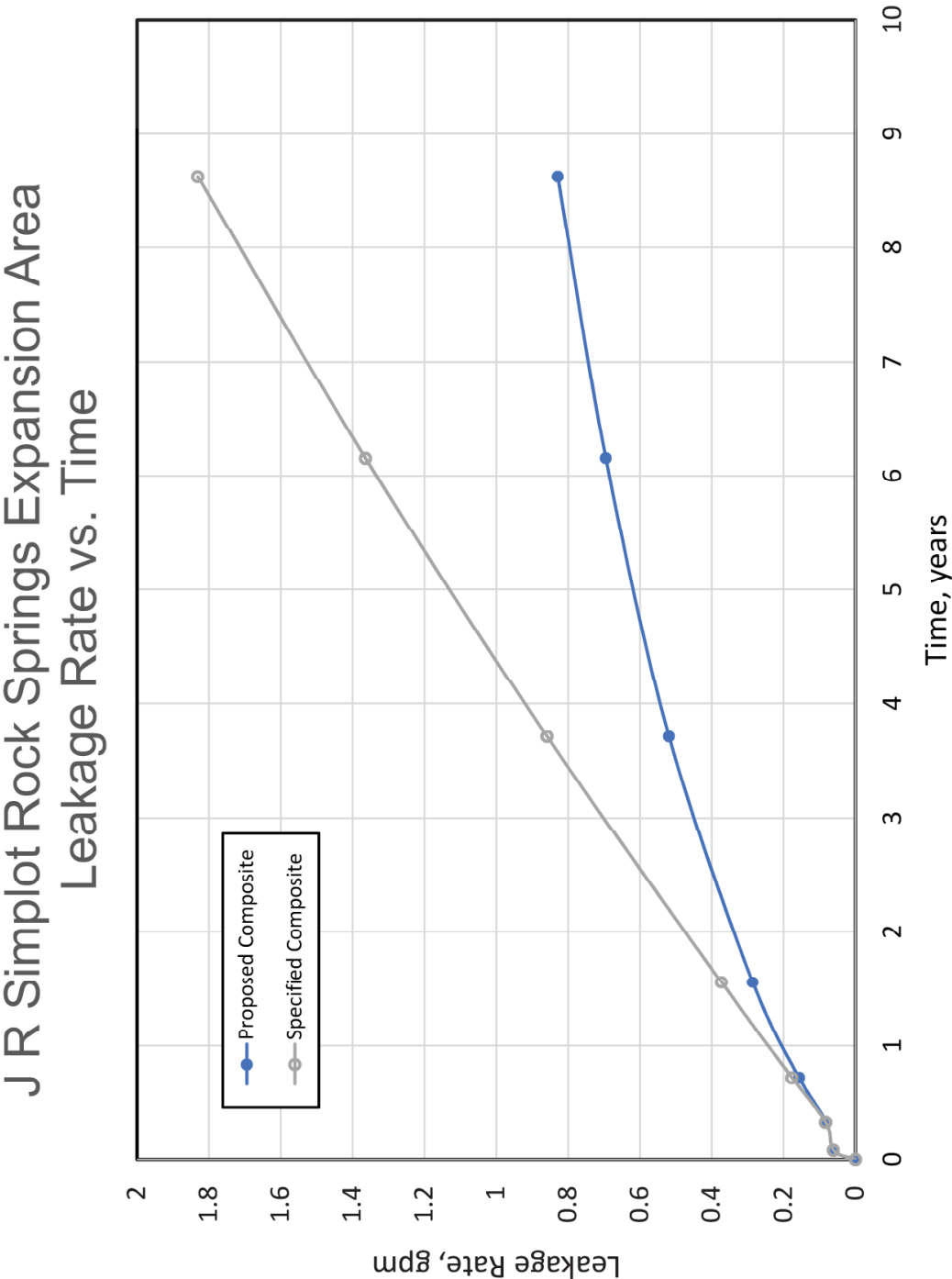


Figure No. 7

Ardaman Associates, Inc.  
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