

ATTACHMENT 3

POST-CLOSURE FINANCIAL REQUIREMENTS

SECTION 5

Post-Closure Costs and Financial Assurances

5.1 POST-CLOSURE COST ESTIMATES

This section estimates costs for facility post-closure care in accordance with 40 CFR 264.144. Estimated post-closure costs are based on the activities detailed in other sections of this application. This estimate reflects the cost of a third party carrying out post-closure care activities at the facility, as required by 40 CFR 264.144(a)(1).

The estimated costs shown in Table 5-1 are expressed in 2015 U.S. dollars, and include administrative costs. Site closure was certified in February, 1998. As of 2015, the facility is in its 17th year of post-closure care, and 13 years remain in the post-closure period.

5.2 FINANCIAL ASSURANCE FOR POST-CLOSURE CARE

5.2.1 Post-Closure Insurance

The most current (as of September 2016) insurance certificate, with a face amount equal to or greater than, the post-closure cost estimate is included as Appendix H.

5.2.2 Liability Insurance

USEI maintains insurance coverage, as required by 40 CFR 264.147, for sudden (accidental) and non-sudden (long-term) incidents. This insurance is termed, respectively, Commercial General Liability (CGL, sudden) and Pollution and Radiation Legal Liability. The insurance provides the minimum insurance specified in 40 CFR 264.147. Copies of the certificates of insurance evidencing coverage are attached as Appendix H and maintained in the Site A operating record.

Table 5-1: 2015 Annual Post-Closure Cost Estimate, Site A, Bruneau, ID

Inspections and Maintenance					
Item	Activity	Assumptions	Frequency	Costs	Total
1	Site Inspections	1 person with vehicle; 8-hour day	928	\$ 21.73	\$20,162
2	Routine Monitoring & Maintenance	Allowance	1	\$ 29,726.75	\$29,727
3	Erosion Damage Repair	Allowance	1	\$ 13,662.63	\$13,663
4	Fence Maintenance	Allowance	1	\$ 3,896.41	\$3,896
5	Rodent Control	Allowance	1	\$ 3,896.41	\$3,896
6	Road Maintenance	Allowance	1	\$ 9,749.80	\$9,750
7	Sign & Benchmark Maintenance	Allowance	1	\$ 1,956.41	\$1,956
Sub-Total					\$83,051

Groundwater Monitoring and Well Maintenance					
Item	Activity		Frequency	Costs	Total
1	Routine Analytical Costs	Allowance	1	\$133,226.90	\$133,227
3	Sample Costs	Allowance	1	\$197,311.90	\$197,312
4	Well Maintenance/Replacement	Allowance	1	\$ 31,503.58	\$31,504
5	Environmental Monitoring Reports	Allowance	58	\$ 566.09	\$32,833
6	Purge Water Disposal	Allowance	30,000.00	\$ 0.81	\$24,285
Sub-Total					\$419,161

Post-Closure Administration					
Item	Activity		Frequency	Costs	Total
1	Administration Costs	Allowance	3712	\$17	\$63,670
Sub-Total					

Total Annual Costs					
Item	Activity				
1	Inspections and Maintenance	See above			\$83,051
2	Groundwater Monitoring and Well Maintenance	See above			\$419,161
3	Post-Closure Administration	See above			\$63,670
GRAND TOTAL					\$565,882