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***Hazardous Waste Management Act/
Resource Conservation and Recovery
Act (HWMA/RCRA) Work Plan for the
Idaho National Engineering and
Environmental Laboratory (INEEL)***

EPA ID No. ID4890008952

***EPA ID No. IDR000002881 (BNFL Inc. – AMWTP Treatment
Permit only)***

CONTENTS

ACRONYMS	ii
INTRODUCTION	1
Table 1. DEQ/INEEL Proposed Permitting Schedule	2
Table 2. INEEL Waste Management Processes to be Closed.....	8
Table 3. Closed Waste Management Processes at the INEEL.....	13
Table 4. Work Plan for INEEL Waste Management Units.....	15
Appendix A - Descriptions of INEEL HWMA/RCRA Waste Management Processes	
Appendix B - Historical Summary Information	
Appendix C - HWMA/RCRA Permitting Point of Contact Matrix	
Appendix D - INEEL RCRA Regulatory Milestones	

ACRONYMS

AMWTF	Advanced Mixed Waste Treatment Facility
AMWTP	Advanced Mixed Waste Treatment Project
ANL-W	Argonne National Laboratory-West
ARA	Auxiliary Reactor Area
ARARs	applicable or relevant and appropriate requirements
ARVFS	Army Reentry Vehicle Facility Site
ASB	Air Support Building
BBWI	Bechtel BWXT Idaho, LLC
CAM	Constant Air Monitor
C&S	Certified and Segregated
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFA	Central Facilities Area
CFR	Code of Federal Regulations
COCA	Consent Order and Compliance Agreement
CSSF	Calcined Solids Storage Facility
D&D	decontamination and dismantlement
DEQ	Department of Environmental Quality
EBR	Experimental Breeder Reactor
EPA	Environmental Protection Agency
ETS	Evaporator Tank System
FAST	Fluorinel Dissolution Process and Fuel Storage
FFA/CO	Federal Facilities Agreement and Consent Order
FR	Federal Register
FS&R	Filling, Storage, and Remelt System
HCRWSF	Hazardous Chemical and Radioactive Waste Storage Facility (CPP-1619)

HCWHNF	Hazardous Chemical Waste Handling and Neutralization Facility
HEPA	high-efficiency particulate air
HFEF	Hot Fuel Examination Facility
HFLS	HEPA Filter Leaching System
HTRE	Heat Transfer Reactor Experiment
HWMA	Hazardous Waste Management Act
HWSF	Hazardous Waste Storage Facility
ICPP	Idaho Chemical Processing Plant
IET	Initial Engine Test
ILRWMS	Intermediate-Level Radioactive Waste Management System
ILTSF	Intermediate-Level Transuranic Storage Facility
ILWMS	INTEC Liquid Waste Management System
INEEL	Idaho National Engineering and Environmental Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
LDRs	land disposal restrictions
LDUs	land disposal units
LET&D	Liquid Effluent Treatment and Disposal
LOFT	Loss-of-Fluid Test (facility)
M&O	management and operations
MCC	Multicurie Cell
MWSF	Mixed Waste Storage Facility
N/A	not applicable
NaK	Sodium-Potassium
NE-ID	Department of Energy, Idaho Operations Office
NOD	Notice of Deficiency
NODA	Naval Ordnance Disposal Area

NON/CO	Notice of Noncompliance/Consent Order
NRF	Naval Reactors Facility
NWCF	New Waste Calcining Facility
PBF	Power Burst Facility
PEWE	Process Equipment Waste Evaporator (system)
PMR	permit modification request
POC	point of contact
PREPP	Process Experimental Pilot Plant
PSS	Primary Sodium System
PSUs	Portable Storage Units
PWTU	Portable Water Treatment Unit
RCRA	Resource Conservation and Recovery Act
RMF	Retrieval Modification Facility
RMWSF	Radioactive Mixed Waste Staging Facility (CPP-1617)
ROD	Record of Decision
RSSF	Radioactive Sodium Storage Facility
RSTA	Reactives Storage and Treatment Area
RSWF	Radioactive Scrap and Waste Facility
RTA	Request for Temporary Authorization
RTF	Remote Treatment Facility
RWMC	Radioactive Waste Management Complex
SCMS	Sodium Components Maintenance Shop
SMC	Specific Manufacturing Capability
SPERT	Special Power Excursion Reactor Test
SPF	Sodium Process Facility
SSA	SWEPP Storage Area

SSB	Sodium Storage Building
SSPS	Secondary Sodium Purification System
SSS	Secondary Sodium System
STP	Site Treatment Plan
SWEPP	Stored Waste Examination Pilot Plant
TAN	Test Area North
TBD	to be determined
TFF	Tank Farm Facility
THWS	TAN Hazardous Waste Storage
TRA	Test Reactor Area
TRU	transuranic
TSA	Transuranic Storage Area
TSA-RE	Transuranic Storage Area - Retrieval Enclosure
TSA-RMF	TSA-Retrieval Modification Facility
TSF	Technical Support Facility
VCO	Voluntary Consent Order
WCF	Waste Calcining Facility (located at INTEC)
WCF	Waste Characterization Facility (located at RWMC)
WEDF	Waste Engineering Development Facility
WERF	Waste Experimental Reduction Facility
WIPP	Waste Isolation Pilot Plant
WROC	Waste Reduction Operations Complex
WSF	Waste Storage Facility
WWSB	WERF Waste Storage Building

1. INTRODUCTION

This Work Plan documents the proposed schedules for Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) permitting and closure activities at the Idaho National Engineering and Environmental Laboratory (INEEL). This document incorporates applicable Site Treatment Plan (STP) milestones, amended Notice of Noncompliance/Consent Order (NON/CO) deadlines, Voluntary Consent Order (VCO) milestones, and proposed permit application, closure plan, and permit modification submittal dates.

Table 1 presents the proposed schedule for deadlines/milestones for HWMA/RCRA units located at the INEEL. These deadlines/milestones include milestones identified in the STP, as well as milestones identified for HWMA/RCRA permitting and closure activities.

Table 2 presents the proposed schedule of INEEL HWMA/RCRA units to be closed.

Table 3 presents closed INEEL HWMA/RCRA units.

Table 4 presents the work plan for INEEL HWMA/RCRA units; this table also includes historical closure information.

Appendix A includes descriptions of INEEL HWMA/RCRA units and related historical information of units closed under HWMA/RCRA regulations.

Appendix B provides historical information for INEEL HWMA/RCRA units.

Appendix C provides the RCRA permitting point of contact (POC) matrix for the INEEL.

Appendix D provides the INEEL RCRA Regulatory Milestones in graphic format.

Table 1. DEQ/INEEL Proposed Permitting Schedule.

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
Volume 17 - HWMA/RCRA Part B Permit Application for the INEEL – Notice of Deficiency (NOD) Response and a Class 3 Permit Modification Request (PMR) Adding Volume 17 Information to the Volume 18 – HWMA Storage & Treatment Permit for the Idaho Nuclear Technology and Engineering Center (INTEC)		
1	The INEEL, per request of the Department of Environmental Quality (DEQ), held a pre-application public meeting on:	05/15/2002
2	The INEEL submitted to DEQ the finalized NOD response and a Class 3 PMR on:	11/22/2002
3	The INEEL held a public meeting for the Class 3 PMR on:	12/10/2002
4	The INEEL receives initial completeness letter from the DEQ on:	12/23/2002
5	The 60-day public comment period for the Class 3 PMR ended on:	01/16/2003
6	The DEQ prepares determination of technical completeness by a target date of:	02/21/2003
7	The DEQ prepares a draft permit by a target date of:	04/22/2003
8	Public participation package submitted to the Environmental Protection Agency (EPA)-Region X for 15-day review by a target date of:	06/21/2003
9	DEQ finalized draft permit and issued a public participation package for the draft permit on:	07/16/2003
10	DEQ held public hearing for the Class 3 PMR on:	08/21/2003
11	DEQ public notice/comment period for draft permit ended on:	09/01/2003
12	The DEQ approved the Class 3 PMR on 09/03/2003 – with the modified Volume 18 permit effective date of:	09/03/2003
13	The INEEL received DEQ's approval of the Class 3 PMR on:	09/08/2003
14	The INEEL transmits clean copy permit pages to the DEQ by a target date of:	10/17/2003

Table 1. (continued).

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
Volume 14 - INTEC Liquid Waste Management System (ILWMS) HWMA/RCRA Part B Permit Application for the INEEL		
1	The INEEL transmitted the certified Volume 14 ILMWS Permit Application to the DEQ on:	06/29/2001
2	The DEQ reviewed the permit application and deemed it administratively complete on:	07/30/2001
3	The DEQ completed the technical review of the permit application and issued a NOD. The INEEL received the NOD on:	04/17/2002
4	The INEEL transmitted the revised application and NOD response to the DEQ on:	12/17/2002
5	The DEQ issued a second NOD for the Volume 14 permit application on:	05/02/2003
6	The INEEL received the second Volume 14 NOD on:	05/07/2003
7	The INEEL requested a 60-day extension for submittal of the NOD response/ revised Part B permit application on:	05/29/2003
8	The DEQ granted a 60-day extension for submittal of the NOD response/revised ILWMS HWMA/RCRA Part B Permit Application on:	06/16/2003
9	The INEEL submits the response to the second NOD, the ILWMS Risk Evaluation Work Plan, and the revised Volume 14 - ILMWS HWMA/RCRA Part B Permit Application by:	10/06/2003
10	DEQ concurrence with ILWMS Risk Evaluation Work Plan by a target date of:	11/2003
11	The INEEL transmits the ILWMS Risk Evaluation by a target date of:	08/2004
12	The DEQ issues the draft permit/public participation package by a target date of:	11/2004

Table 1. (continued).

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
Volume 21 - HWMA/RCRA Post-Closure Permit Application for the Waste Calcining Facility (WCF)		
1	The DEQ requested submittal of a Part B Permit Application for WCF Post-Closure Care and Monitoring on:	02/13/2001
2	The INEEL transmitted the certified Volume 21 – HWMA/RCRA Post-Closure Permit Application for the WCF to the DEQ on:	08/14/2001
3	Per request of the DEQ, the INEEL transmitted a WCF Part A Permit Application for inclusion into the Volume 21 - HWMA/RCRA Post-Closure Permit Application for the WCF on:	10/02/2001
4	The DEQ completed the technical review of the post-closure permit application and issued a NOD on:	11/27/2001
5	The INEEL transmitted the NOD response to the DEQ on:	02/26/2002
6	The DEQ transmitted a compliance monitoring request to the INEEL on: The INEEL transmitted a response letter to the DEQ regarding INEEL's compliance monitoring on:	02/27/2002 03/28/2002
7	The DEQ issued a second NOD on:	05/15/2002
8	The INEEL transmitted the revised application and NOD response to the DEQ on:	09/17/2002
9	The DEQ reviewed the revised application/NOD response and issued a public participation package for the draft WCF Post Closure Permit on:	05/30/2003
10	The 45-day DEQ public comment period with 15 day extension ended on:	08/20/2003
11	The DEQ held a public hearing on the draft WCF HWMA/RCRA Post-Closure Permit on:	08/20/2003
12	The DEQ finalizes the permit by a target date of:	10/01/2003
13	The DEQ issues the permit with the effective date of:	11/01/2003
INTEC Facility Assessment		
1	The INEEL completes a facility assessment of the Calcined Solids Storage Facility (CSSF) and transmits the facility assessment to the DEQ by a target date of:	09/30/2003

Table 1. (continued).

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
INTEC – Volume 18 Class 2 PMR/Request for Temporary Authorization (RTA) for Storage of Hazardous &/or Mixed Waste and Debris in Container Storage Units located in CPP-659/-1659		
1	The INEEL transmitted a Class 2 PMR/Request for Temporary Authorization (RTA) to the DEQ to allow for the storage of hazardous &/or mixed waste and debris in container storage units located in CPP-659/-1659.	07/29/2003
2	The INEEL completed the legal notice for the Class 2 PMR on:	07/26/2003
	The INEEL completed the public mail-out for the Class 2 PMR on:	07/29/2003
3	The INEEL held a public meeting on:	08/13/2003
4	The DEQ approves the RTA by a target date of:	09/15/2003
5	The 60-day public comment period ends on:	09/23/2003
6	The DEQ approves the PMR by a target date of:	09/30/2003
7	The INEEL transmits clean copy pages of the permit to the DEQ by a target date of:	11/14/2003
Waste Reduction Operations Complex (WROC) Class 1 PMR Requiring Prior Approval for Changing the Closure Date and any Changes to the Closure Plan for the Mixed Waste Storage Facility (MWSF), the MWSF Portable Storage Units (PSUs), and the Waste Experimental Reduction Facility (WERF) Waste Storage Building (WWSB), and Removal of the Sizing Unit		
1	The INEEL transmitted the Class 1 PMR to the DEQ on:	07/29/2003
2	The DEQ approves the Class 1 PMR on:	09/04/2003
3	The INEEL received DEQ's approval of the Class 1 PMR on:	09/10/2003
3	The INEEL transmits clean copy permit pages to the DEQ by a target date of:	10/18/2003
4	The INEEL transmits notification letter of the approved PMR to all persons on the INEEL mailing list by a target date of:	11/26/2003

Table 1. (continued).

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
Volume 22 – HWMA/RCRA Part B Permit Application for the CSSF		
1	The INEEL provides public notice and then holds a pre-application meeting for the Volume 22 CSSF permit application by a target date of:	4/2004
2	The INEEL transmits the CSSF permit application to the DEQ by a target date of:	09/30/2004
3	The DEQ reviews the CSSF permit application for initial completeness by a target date of:	11/30/2004
4	If the application is deemed complete, the DEQ continues their review and issues a draft permit for public comment/review or issues a NOD by a target date of:	TBD
INTEC Volume 18 PMR to allow for Storage in the Calciner Vessel		
1	The INEEL transmits a PMR for the Volume 18 HWMA/RCRA Permit to allow for Calciner Vessel Storage – in accordance with the approved New Waste Calcining Facility (NWCF) Calciner System Closure Plan, by a target date of:	06/27/2004
Volume 3 - HWMA/RCRA Part B Permit Application for the INEEL – General Information for INEEL Waste Management Units – Updated to incorporate revised INEEL information		
1	The INEEL certifies and submits to the DEQ, Revision 11 of the HWMA/RCRA Part B Permit Application for the INEEL, Volume 3 by a target date of:	07/31/2004
Volume 1 - HWMA/RCRA Part A Permit Application for the INEEL - Volume 1 – Bechtel BWXT Idaho, LLC (BBWI) - Updated to incorporate DEQ approved changes		
1	The INEEL revises Volume 1 to reflect all necessary changes and DEQ approvals from November 2002 through August 2003, to be transmitted to the DEQ by a target date of:	09/30/2003
2	The INEEL revises Volume 1 to reflect all necessary changes and DEQ approvals from September 2003 through February 2004, to be transmitted to the DEQ by a target date of:	03/31/2004

Table 1. (continued).

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
Summary of the Part A for HWMA/RCRA Units at the INEEL – Updated to incorporate DEQ approved changes		
1	The INEEL revises the Part A Summary to reflect approved DEQ changes for all interim status and permitted units at the INEEL. Revised document to be completed and transmitted to the Department of Energy, Idaho Operations Office (NE-ID) by a target date of: The Part A Summary for HWMA/RCRA Units at the INEEL is posted on the Internet @: http://www.inel.gov/publicdocuments by a target date of:	09/01/2003, 03/01/2004, 09/01/2004 09/15/2003, 03/15/2004, 09/15/2004
HWMA/RCRA Work Plan for the INEEL – Revision		
1	The INEEL revises/updates the HWMA/RCRA Work Plan for the INEEL and posts the document on the Internet @ http://www.inel.gov/publicdocuments by a target date of:	09/30/2003, 04/30/2004, 09/30/2004
BNFL Inc. – Class 3 PMR/RTA for the AMWTP Storage Permit – PMR to add the Box Opening Facility and Change Visual Examination Requirements		
1	BNFL Inc. publishes legal notice for the Class 3 PMR/RTA on:	09/02/2003
2	BNFL Inc. transmits the certified Class 3 PMR/RTA to the DEQ by a target date of:	10/10/2003
3	BNFL Inc. holds public meeting by a target date of:	10/28/2003
4	DEQ approves the RTA by a target date of:	10/02/2003
5	60-day public comment period ends by a target date of:	10/31/2003
6	DEQ issues draft permit for public comment by a target date of:	01/23/2004
7	45-day public comment period ends by a target date of:	03/08/2004
8	DEQ approves the PMR by a target date of:	04/06/2004
9	BNFL Inc. transmits clean copy permit pages to the DEQ by a target date of:	05/21/2004

Table 1. (continued).

HWMA/RCRA Permitting Items/Milestones		Deliverable Date
BNFL Inc. – Class 3 PRM/RTA for the Advanced Mixed Waste Treatment Facility (AMWTF) Treatment Permit – PMR to Prepare for Operations		
1	BNFL Inc. publishes legal notice by a target date of:	11/18/2003
2	BNFL Inc. transmits the certified PMR/RTA to the DEQ by a target date of:	11/20/2003
3	BNFL Inc. holds public meeting by a target date of:	12/18/2003
4	DEQ approves the RTA by a target date of:	12/30/2003
5	60-day public comment period ends by a target date of:	01/23/2004
6	DEQ issues draft permit for public comment by a target date of:	03/29/2004
7	45-day public comment period ends by a target date of:	05/13/2004
8	DEQ approves the PMR by a target date of:	06/14/2004
9	BNFL Inc. transmits clean copy permit pages to the DEQ by a target date of:	07/29/2004
Volume 4 - Argonne National Laboratory-West (ANL-W) Storage Facilities Radioactive Scrap and Waste Facility (RSWF), Hot Fuel Examination Facility (HFEF) and Sodium Storage Building (SSB): Reapplication for the RSWF, HFEF and SSB		
1	ANL-W completed the pre-application public meeting:	05/01/2003
2	ANL-W transmitted certified permit application to the DEQ:	07/01/2003
3	DEQ reviews permit application by a target date of:	01/01/2004
4	DEQ issues NOD by a target date of:	02/01/2004
5	ANL-W submits draft NOD response to the DEQ by a target date of:	05/01/2004
6	DEQ review cycle of the draft NOD response completed and comment resolution meeting is held by a target date of:	08/01/2004
7	ANL-W submits to the DEQ the finalized NOD response/Part B permit application by a target date of:	10/01/2004

Table 2. DEQ/INEEL Waste Management Processes to be Closed.

RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL		
BBWI CLOSURES		
1	<p>INTEC - NWCF Calciner System Closure Plan:</p> <ul style="list-style-type: none"> • DEQ reviewed the revised closure plan (submitted on 03/29/01) and transmitted a second NOD to the INEEL on: • The INEEL transmitted the revised closure plan to the DEQ on: • The INEEL received the third NOD on January 28, 2002. A revised closure plan was submitted to the DEQ on: • The DEQ submitted the closure plan and public participation package to the Region X EPA for their review/concurrence on: • The closure plan was approved by the DEQ on: • The final PE certification is due to the DEQ by a target date of: 	<p>05/31/2001</p> <p>07/26/2001</p> <p>04/29/2002</p> <p>08/16/2002</p> <p>11/25/2002</p> <p>10/25/2004</p>
2	<p>INTEC – CPP-601 D-Cell Container Storage Area Closure Plan is expected to be submitted to the DEQ by a target date of:</p>	<p>09/30/2003</p>
3	<p>INTEC - CPP-603 Basin Water Treatment System (VCO item) Closure Plan target dates:</p> <ul style="list-style-type: none"> • The INEEL submitted the closure plan to the DEQ on: • DEQ to review and provide comments to the INEEL by a target date of: 	<p>06/23/2003</p> <p>10/28/2003</p>
4	<p>INTEC – CPP-603 Storage Tank (VES-SFE-106) Closure Plan will be submitted to the DEQ by a target date of [tentative schedule is based on decontamination and dismantlement (D&D) project funding]:</p>	<p>FY 2005</p>
5	<p>INTEC - 640 Headend Holdup Tanks Closure Plan is scheduled for submittal to the DEQ by a target date of (tentative schedule is based on the Environmental Management Performance Management Plan for Accelerating Cleanup on the INEEL):</p>	<p>After FY 2012</p>

Table 2. (continued).

RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL		
6	<p>INTEC - INTEC Tank Farm Facility (TFF) Closure Plan Submittals (per the NON/CO):</p> <ul style="list-style-type: none"> • Phase 1 - Tanks VES-WM-182 and VES-WM-183 revised closure plan and NOD response was submitted to the DEQ on: <ul style="list-style-type: none"> - INEEL received second NOD from the DEQ on 8/27/01. INEEL received an extension to submit revised plan by 11/21/01 - Revised plan and second NOD response transmitted to the DEQ on: - DEQ public-notice of the plan with an addendum on: - INEEL received approval of the closure plan on: - Closure activities have commenced – closure completion date: • Phase 2 - Tanks VES-WM-184, VES-WM-185, VES-WM-186 cease use date by 6/2003 - closure plan submitted to DEQ on: <ul style="list-style-type: none"> - DEQ determined that the revised closure plan for tanks VES-WM-184, VES-WM-185, and VES-WM-186 was technically incomplete and the INEEL received a NOD on: - The INEEL responds to the NOD/revises the closure plan by a target date of: • Phase 3 - Tank VES-WM-181 and VCO tanks VES-WM-103, VES-WM-104, VES-WM-105, and VES-WM-106 closure plan to be submitted to DEQ by a target date of: 	<p>05/25/2001</p> <p>11/21/2001</p> <p>03/15/2002</p> <p>03/15/2002</p> <p>04/23/2002</p> <p>TBD</p> <p>05/23/2003</p> <p>08/26/2003</p> <p>09/26/2003</p> <p>FY 2004</p>
7	<p>Test Area North (TAN) - TAN-647 Waste Storage Facility (WSF) Closure Plan was submitted to the DEQ on:</p> <ul style="list-style-type: none"> • The INEEL received a NOD on the TAN-647 closure plan from the DEQ on: • The INEEL transmitted a revised closure plan to the DEQ on: • The INEEL received DEQ's approval of the closure plan on: • The INEEL completed closure activities on: • The INEEL submits P.E. Certification of Closure to the DEQ by a target date of: 	<p>11/25/2002</p> <p>01/2003</p> <p>01/28/2003</p> <p>06/02/2003</p> <p>08/04/2003</p> <p>09/30/2003</p>
8	<p>WROC - WERF Incinerator, WERF Drum/Feed Blending Unit, and WERF Repackaging Unit Closure Plan:</p> <ul style="list-style-type: none"> • Second revision to the closure plan was submitted to the DEQ: • INEEL receives DEQ approval of closure plan on: • Closure completed on: • Closure certification to be completed and transmitted to the DEQ by: 	<p>02/22/2001</p> <p>04/12/2001</p> <p>07/29/2003</p> <p>09/27/2003</p>

Table 2. (continued).

RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL		
9	<p>WROC/WERF Stabilization Unit (drum tumbler located in building PER-609, room B-106 and the double planetary mixer located in building PER-609, room 109) Closure Plan submitted to the DEQ:</p> <ul style="list-style-type: none"> • DEQ public-noticed the closure plan on: • Public comment period ended on: • The INEEL received DEQ approval of the closure plan on: • Closure to be completed by (includes approved extension): • The INEEL completes activities as specified in the approved closure plan on: • The INEEL is to submit closure certification along with WERF Incinerator Certification to the DEQ on: 	<p>11/16/2001</p> <p>03/07/2002</p> <p>04/08/2002</p> <p>04/15/2002</p> <p>12/31/2002</p> <p>11/27/2002</p> <p>09/27/2003</p>
10	<p>Notice of Intent to Close the MWSF, WWSB, and the MWSF PSUs was submitted to the DEQ:</p> <ul style="list-style-type: none"> • Closure of the MWSF, WWSB, and MWSF PSUs will begin by a target date of: 	<p>08/28/2003</p> <p>10/15/2003</p>
11	<p>The INEEL expects to submit a closure plan to for the MWSF Repackaging unit (to be closed under interim status) by a target date of:</p>	09/30/2003
12	<p>Loss-of-Fluid Test (LOFT) Tanks/Sumps Closure Plan is scheduled for submittal to the DEQ by a VCO milestone date of:</p>	03/31/2005
13	<p>TAN/Technical Support Facility (TSF) Intermediate-Level Radioactive Waste Management System (ILRWMS):</p> <ul style="list-style-type: none"> • The INEEL transmitted a partial closure approach letter to the DEQ for the three ILRWMS subsystems on: • Phase I - Treatment Subsystem (TAN-616) Closure Plan (VCO Closure) was submitted to the DEQ on: <ul style="list-style-type: none"> - The INEEL received a NOD on: - The INEEL transmits revised closure plan to the DEQ by a target date of: • Phase II – Feed Subsystem (V-tanks) Closure Plan was submitted [per the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Record of Decision (ROD) for the TAN OU 1-10] to the DEQ on: <ul style="list-style-type: none"> - Public comment period ended on: - The INEEL receives approval of the closure plan on: • Phase III – ILRWMS Holding Tank System (PM-2A Tanks) Closure Plan was submitted (per the CERCLA ROD for the TAN OU 1-10) to the DEQ on: 	<p>07/19/2002</p> <p>03/18/2003</p> <p>06/01/2003</p> <p>09/30/2003</p> <p>01/28/2003</p> <p>08/04/2003</p> <p>09/04/2003</p> <p>07/24/2003</p>

Table 2. (continued).

RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL		
14	INTEC PEWE Evaporator Condensate System, VCO Site Tank-005, Tank System INTEC-049 closure plan to be submitted to the DEQ by a target date of:	12/31/2003
15	TAN-607 Demineralized Water System, VCO System TAN-031 closure plan to be submitted to the DEQ by a target date of:	09/30/2003
16	<p>INTEC SFE-VES-20 Hot Waste Tank System Closure (This HWMA/RCRA closure plan is consistent with commitments made under September 1999 ROD for OU 3-14, Group 7).</p> <ul style="list-style-type: none"> • DEQ approved VES-SFE-20 Closure Plan: 05/2002 • INEEL submits modified closure plan to DEQ: 09/2002 • INEEL submits modified closure plan to DEQ: 05/13/2003 • DEQ reviews and approves the modification on: 06/19/2003 • INEEL submits revised sampling plan to the DEQ on: 06/18/2004 • DEQ approves sample report by: 09/30/2004 • INEEL completes tank sampling: 12/31/2005 • INEEL submits sample report to DEQ: 04/30/2006 • DEQ approves sample report: 05/30/2006 • INEEL completes closure activities in accordance with the CERCLA OU3-13 ROD: Schedule as outlined in the Remedial Action Work Plan • INEEL submits closure certification to the DEQ by: 60 days following completion of closure activities 	
BNFL Inc. CLOSURES		
1	Radioactive Waste Management Complex (RWMC) - Transuranic Storage Area (TSA) Pads - BNFL Inc. submits a closure plan with a compliance schedule to the DEQ by a target date of:	01/10/2003

Table 3. Closed INEEL Waste Management Processes.

Unit Process Name	Location	DEQ Approved Closure Date
WERF Sort, Size, and Segregate Unit	WERF/WROC	09/23/2002
TAN-628 - TAN Hazardous Waste Storage (THWS)	TAN	02/20/2002
Test Reactor Area (TRA) Filling, Storage, and Remelt (FS&R) Facility (VCO Unit Closure)	TRA	05/24/2002
Experimental Breeder Reactor (EBR)-II Primary Tank Shutdown Coolers and the Primary Purification Sodium Potassium (NaK) Coolant Loop	ANL-W	02/14/2002
EBR-II Secondary Sodium Purification System (SSPS) - Cold Trap	ANL-W	02/14/2002
WERF Macroencapsulation	WROC/Power Burst Facility (PBF)	01/03/2002
Intermediate-Level Transuranic Storage Facility (ILTSF) – Pad 2	RWMC	11/12/2001
Waste Characterization Facility (WCF) at RWMC Administrative Closure	RWMC	09/25/2000
Hazardous Chemical Waste Handling and Neutralization Facility (HCWHNF) - Part B Permit	INTEC	09/18/2000
WERF Waste Storage/Feed Tanks - Administrative Closure	WROC/PBF	05/16/2000
Process Experimental Pilot Plant (PREPP) Incinerator and Waste Stabilization (2 Units)	TAN	03/07/2000
Heat Transfer Reactor Experiment (HTRE) - No. 3	EBR-I	01/31/2000
CPP-633 WCF - Tanks, evaporator, and high efficiency particulate air (HEPA) filter storage (6+ units)	INTEC	11/02/99*
CPP-627 Multicurie Cell (MCC) - Administrative Closure	INTEC	07/20/99
Portable Water Treatment Unit (PWTU)	WROC/TAN	07/08/99
Certified and Segregated (C&S) Building and Air Support Building (ASB)-II	RWMC	04/16/99
Waste Engineering Development Facility (WEDF) Storage and Waste Stabilization (2 units)	WROC/PBF	12/02/97

Table 3. (continued).

Unit Process Name	Location	DEQ Approved Closure Date
Specific Manufacturing Capability (SMC) Calciner, Stabilization, and Storage (3 units)	TAN	09/24/97
TAN-647 Sodium Storage	TAN	06/13/97
Naval Ordnance Disposal Area (NODA)	North of Central Facilities Area (CFA)	02/25/97
TAN-607A Evaporator	TAN	02/25/97
Hazardous Waste Storage Facility (HWSF)	CFA	02/04/97
TAN-681 Evaporator	TAN	12/20/96
Initial Engine Test (IET) Mercury Storage	North of TAN	12/20/96
Army Reentry Vehicle Facility Site (ARVFS) Storage	South of TAN	09/12/96
CPP-666 Fluorinel Dissolution Process and Fuel Storage (FAST) - Storage and Treatment Tanks	INTEC	05/13/96
TAN-726/726A Chromate Treatment and Storage Tanks	TAN	12/26/95
Idaho Chemical Processing Plant (ICPP) Percolation Ponds A & B	INTEC	11/29/95
TRA-610 Lead Storage	TRA	10/27/95
ILTTSF-Pad 1	RWMC	10/24/94
Reactives Storage and Treatment Area (RSTA)	Auxiliary Reactor Area (ARA)	10/24/94
TAN-666 Storage Tank and Treatment Units - Administrative Closure	TAN	10/20/94
ARVFS Chemical Treatment Unit	South of TAN	09/09/94
CPP-663 Hot Shop Storage Tank	INTEC	08/22/94

*The WCF was initially closed as a landfill. Subsequent to this closure, per the request of the DEQ, the INEEL submitted a HWMA/RCRA Post-Closure Permit Application for the WCF (see Table 1 for additional information).

Table 4. Work Plan for the INEEL Waste Management Units.

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 1	HWMA/RCRA Part A Permit Application for the INEEL - BBWI	S01, S02, T01, T04	1, 2, 4a, 4c, 4d, 4e, 4f, 4l	INEEL	A/B/C/D	November 2002 revision of the Part A Permit Application for the INEEL, Volume 1, Book 1 - DEQ requested additional information on 12/17/2002. This information was incorporated into the September 2003 Revision of this document – which is to be submitted to the DEQ by a target date of 9/30/2003.
Volume 1a	HWMA/RCRA Part A Permit Application for the INEEL, Pads TSA-1/TSA-R and TSA-2 and TSA-Retrieval Modification Facility (RMF) - BNFL Inc.	S02	1	RWMC	A/C	Volume 1a - January 2001, change in the operational control of the RWMC TSA interim status units from BBWI to BNFL Inc. - effective on 06/04/2001, at 12:00 a.m.
Volume 2 (This volume is now considered inactive.)	RCRA Part A Permit Application for the INEEL, ANL-W, Sitewide Interim Status Facilities	Not Applicable (N/A)	N/A	ANL-W		All interim status units at the ANL-W were permitted as of 11/10/2002
Volume 3	HWMA/RCRA Part B Permit Application for the INEEL - General Information for INEEL Waste Management Units	N/A	N/A	INEEL	N/A	Partial permits for the INEEL have been approved by the DEQ. Volume 3, Rev. 10 (November 2002) was transmitted to the DEQ on 11/22/2002.
Volume 4	ANL-W Storage Units: RSWF Radioactive Sodium Storage Facility (RSSF) HFEF SSB	S01 S01 S01, T04 S01	1 1 1, 2, 4a, 4l, 4m* 1	ANL-W ANL-771 ANL-797 ANL-785 ANL-703	A/C A/C/D A/C A/D	Permitted 01/24/94 Permitted 01/24/94 Permitted 12/99 NOTE: 4m* (other treatment) = neutralization Permitted 12/99

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 5	ILTSF - Pad 2	N/A	N/A	South West corner of TSA	N/A	Permitted 11/13/95. Closure approved by the DEQ on 11/12/2001.
	*Waste Storage Facility (WSF)	S01	1	Type I/II Modules	A/C	Permitted 11/13/95
	*Stored Waste Examination Pilot Plant (SWEPP) Storage Area (SSA)	S01	1	WMF-610	A/C	Permitted 09/30/96
	Type II Module – WMF-628	S01	1	WMF-628	A/C	Permitted 11/13/95 *NOTE: Operational control of the Type II module WMF-634 was transferred to BNFL Inc. on 08/07/00. Operational control of the Type I and all Type II Modules (except for WMF-628) and SWEPP Storage Area (WMF-610) was transferred to BNFL Inc. January 1, 2003.
Volume 6 (This volume is now considered inactive.)	NWCF Calciner	T04	4d	CPP-659	A/B/C	Interim Status NOTE: Part of the Calciner system is to be permitted as part of the ETS – added to Volume 14 as a PMR.
	NWCF Storage & Treatment Tanks	S02, T01	2, 4c	CPP-659	A/B/C	Interim Status – to be permitted. See Volume 14 information.
Volume 7	HWSF	N/A	N/A	CFA-637	N/A	Permitted 01/24/94. Closure approved by the DEQ on 02/04/97.
Volume 8	HCWHNF	N/A	N/A	INTEC - CPP-620 Annex	N/A	Permitted 05/01/95. Closure approved by the DEQ on 09/18/2000.

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 9	WERF Incinerator	N/A	N/A	WROC/PBF PER-609	N/A	Interim Status was terminated by the DEQ on 11/2/2000. Closure Plan approved by the DEQ on 04/12/2001. Closure was completed on 07/29/2003. Closure certification to be submitted to the DEQ by 09/27/2003.
	WERF Waste Stabilization	T04	4a	WROC/PBF - Special Power Excursion Reactor Test (SPERT)-III	A/D	Interim Status. Closure Plan approved by the DEQ on 04/15/2002. Closure completed 10/12/2002. Closure certification to be submitted to the DEQ by 09/27/2003.
Volume 10 (This volume is now considered inactive.)	Liquid Effluent Treatment & Disposal (LET&D) Fractionators**	S02, X99	4m	INTEC - CPP-1618	A	Interim Status
	LET&D Storage Tank**	S02	2	INTEC - CPP-1618	A	New Unit
	LET&D Nitric Acid Recycle Tank**	S02	2	INTEC - CPP-1618	A	Interim Status
	Process Equipment Waste Evaporator (PEWE) Condensate/Feed Storage Tanks**	S02, T01	2, 4c	INTEC - CPP-604	A	Interim Status
	FAST Debris Storage*	S01	1	INTEC - CPP-666	A	Permitted – Effective Date 11/05/2001
	NWCF Evaporator Tank System (ETS)**	S02, X99	4m	INTEC - CPP-659	A	Interim Status
	NWCF HEPA Filter Leaching System (HFLS)*	S02, T01	2, 4i	INTEC - CPP-659	A	Permitted – Effective date 11/05/2001
						<p>*NOTE: These units have been incorporated into Volume 18 Part B Permit Application.</p> <p>**NOTE: These units have been or will be incorporated into Volume 14 Part B Permit Application.</p>

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 11	MWSF	S01	1	WROC/PBF - PER-613	A/D	Permitted 01/27/2000
	MWSF PSUs	S01	1	WROC/PBF - SPERT-IV	A/D	Permitted 01/27/2000
	WERF WWSB	S01	1	WROC/PBF - PER-623	A/D	Permitted 01/27/2000
	WERF Macroencapsulation*	N/A	N/A	WROC/PBF - PER-622	N/A	Permitted 01/27/2000. Administrative Closure of the WERF Macroencapsulation Unit was approved by the DEQ on 01/03/2002.
	WERF Sizing *	N/A	N/A	WROC/PBF - PER-622	N/A	Permitted 01/27/2000. Closure activities approved by the DEQ on 09/23/2002.
	THWS** * NOTE: Incorporated from Vol. 19 Part B Permit Appl. ** NOTE: Incorporated from Vol. 12 Part B Permit Appl.	N/A	N/A	TAN-628	N/A	THWS Permit Expired on 06/01/2002. Completion of closure activities acknowledged by the DEQ on 02/20/2002.
Volume 12 (This Volume is now considered inactive.)	THWS NOTE: This information was incorporated into Vol. 11 Part B permit application, per NOD from DEQ.	N/A	N/A	TAN-628	N/A	Incorporated into Volume 11
Volume 13 (This Volume is now considered inactive.)	TSA-Retrieval Enclosure (RE) RMF	S01	1	RWMC	A/C	BNFL Inc. - Interim Status
	WCF at RWMC	N/A	N/A	RWMC	N/A	Administrative Closure approved by the DEQ 09/25/2000.

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 14	INTEC Liquid Waste Management System (ILWMS)			INTEC		
	CPP-604 PEWE Evaporators (EVAP-WL-129, EVAP-WL-161)	T04	4m	INTEC CPP-604	A	Interim Status
	CPP-604 PEWE Feed Storage and Treatment Tanks (VES-WL-101, -102, -111, -132, -133)	S02, T01	2, 4c	INTEC CPP-604	A	Interim Status
	CPP-604 Bottoms Collection Tanks (VES-WL-101, VES-WL-111)	S02, T01	2, 4c	INTEC CPP-604	A	Interim Status
	CPP-604 PEWE Condensate Feed Storage Tanks (VES-WL-106, -107, -163)	S02, T01	2, 4c	INTEC CPP-604	A	Interim Status
	CPP-604 Condensate Tanks (VES-WL-134, -131, -108)	S02	2	INTEC CPP-604	A	VCO units - to be permitted
	CPP-604 Evaporator Head Tank (VES-WL-109)	S02	2	INTEC CPP-604	A	VCO unit - to be permitted
	CPP-601 WG/WH Cells Storage and Treatment Tanks (VES-WG-100, -101, VES-WH-100, -101)	S02, T01	2, 4c	INTEC CPP-601	A	Interim Status
	CPP-641 Westside Holdup Storage Tanks (VES-WL-103, -104, -105)	S02	2	INTEC CPP-641	A	Interim Status
	CPP-604 Process Waste Liquid Tanks (VES WL-135, -136, -137, -138, -139, -142, -144, and -150)	S02	2	INTEC CPP-604	A	VCO units - to be permitted
	CPP-604 Tank Farm Tanks (VES-WM-100, -101, -102)	S02	2	INTEC CPP-604	A	Interim Status
	LET&D Fractionators (VES-WLL-170, VES-WLK-171)	T04	4m	INTEC CPP-1618	A	Interim Status
	LET&D Nitric Acid Recycle Tank (VES-NCR-171)	S02	2	INTEC CPP-659 Annex	A	Interim Status
	LET&D Nitric Acid Head Tank (VES-NCR-173)	S02	2	INTEC CPP-659 Annex	A	VCO unit – to be permitted
	LET&D Waste Feed Head Tank (VES-WLK-197)	S02	2	INTEC CPP-1618	A	VCO unit - to be permitted

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 14 (continued)	LET&D Acid Fractionator Bottoms Tank (VES-WLL-195)	S02	2	INTEC CPP-1618	A	VCO unit - to be permitted
	NOTE: NWCFS ETS Units To be permitted under Volume 14 in the future: VES-NCC-101, -102, -103, -108, -116, -119, - 122, -136, 152, EVAP-NCC-150	S02, T01, T04	2, 4c	INTEC CPP-659	A	Both Interim Status and new units to be permitted in the future.
Volume 15 (This volume is now considered inactive.)	ARVFS Sodium-Potassium Waste Treatment at ANL-W	N/A	N/A	ANL-W	N/A	ARVFS Treatment closed 09/09/94
	Sodium Components Maintenance Shop (SCMS)	S01, S02, T01, T04	1, 2, 4a, 4c, 4j	ANL-793	A/D	SCMS – incorporated into Volume 16
Volume 16	ANL-W Treatment Units:			ANL-W		
	Sodium Process Facility (SPF)	S01, S02, T01, T04	1, 2, 4a, 4c	ANL-799	A/D	Permitted 01/24/97
	SCMS	S01, S02, T01, T04	1, 2, 4a, 4c, 4j, 4l, 4m*	ANL-793	A/D	Permitted 03/30/2001 NOTE: 4m* (other treatment) = neutralization
	Remote Treatment Facility (RTF)	S01, S02, T01, T04	1, 2, 4	ANL-785	A/B/C/D	Planned Facility
	EBR-II Primary Sodium System (PSS)	S01, S02, T01	1,2,4c	ANL-767/795	A	Permitted 11/10/02
EBR-II Secondary Sodium System (SSS)	S02, T01	2, 4c	ANL-766	A	Permitted 11/10/02	
Volume 17 (This volume is now considered inactive)	Radioactive Mixed Waste Staging Facility (RMWSF)	S01	1	CPP-1617	A/D	Permitted – See Volume 18 information.
	Hazardous Chemical and Radioactive Waste Storage Facility (HCRWSF)	S01	1	CPP-1619	A/D	Permitted – See Volume 18 information.
	CPP-601/627 Container Storage NOTE: CPP-601/627 unit removed from Volume 17, per NOD from DEQ.	S01	1	CPP-601	B	Interim Status. DEQ approved closure of CPP-627 on 07/20/99.

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 18	CPP-659/1659 NWCF Container Storage (Rooms 205,206,207,214,215,216,218,306,308,309, 323,326,415,416,417,418,419,421,422, CPP-1659 Contaminated Equipment Maintenance Area)	S01	1	CPP-659/1659	A/C/D	Permitted – Effective Date 11/05/2001
	CPP-659/1659 NWCF Waste Pile Storage (Rooms 216, 218, 306, 308, 309, 323, 326, and 416)	S03	5	CPP-659	A/C/D/	Permitted – Effective Date 11/05/2001
	NWCF Tank Treatment (SH-NCD-933, SH-NCD-934, UC-NCD-921)	T01	4c	CPP-659	A/C/D	Permitted – Effective Date 11/05/2001
	NWCF HFLS (VES-NCD-141, VES-NCD-142)	T01	4c	CPP-659	A/C/D	Permitted – Effective Date 11/05/2001
	NWCF Container Treatment (VES-NCD-138, TK-NC-136, TK-NC-137)	T04	1, 4c, 4j, 4l	CPP-659	A/C/D	Permitted – Effective Date 11/05/2001
	FAST Container Storage [Fuel Dissolution Process (FDP) Cell]	S01	1	CPP-666	A/C/D	Permitted – Effective Date 11/05/2001
	NWCF Holdup and Collection Tanks (VES-NCD-123, VES-NCD-129)	S02, T01	2, 4c	CPP-659	A/C/D	Permitted – Effective Date 11/05/2001
	NWCF Miscellaneous Treatment Unit Scarification/Spalling (Steam Spray Booth & Glovebox (Room 418))	X02	4c, j	CPP-659	A/C/D	Permitted – Effective Date 11/05/2001
	NWCF Miscellaneous Treatment Unit Chemical/Physical Extraction (Steam Spray Booth – Room 418, Decon Cubicle – Rooms 421 and 422, and Decon Cell – Room 308)	X99	4c, j	CPP-659	A/C/D	Permitted – Effective Date 11/05/2001
	Radioactive Mixed Waste Staging Facility (RMWSF)	S01	1	CPP-1617	A/D	Permitted – as of 9/03/2003
Hazardous Chemical and Radioactive Waste Staging Facility (HCRWSF)	S01	1	CPP-1619	A/D	Permitted – as of 9/03/2003	
						NOTE: DEQ issued order affirming the Volume 18 HWMA/RCRA Permit on 05/15/2002

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
Volume 19 (This volume is now considered inactive.)	WERF Macroencapsulation	N/A	N/A	SPERT III	N/A	Incorporated into Volume 11
	WERF Sizing	N/A	N/A	SPERT III	N/A	Incorporated into Volume 11
Volume 20 (This volume is now considered inactive.)	Mercury Retort	N/A	N/A	WROC/PBF	N/A	NOTE: This unit will not be constructed.
Volume 21	WCF - Post Closure Permit	D80	7	INTEC	A/D	Closed as a landfill NOTE: Draft Post-Closure Permit is in public comment cycle. Final Post-Closure Permit is expected 10/1/2003 – with expected effective date of 11/1/2003.
Volume 22	CSSF	S02	2	INTEC	B	Interim Status. CSSF Facility assessment to be completed by 09/30/2003. CSSF HWMA/RCRA Permit Application to be submitted to DEQ by 09/30/2004.
N/A)	AMWTP HWMA/RCRA Treatment Permit - BNFL Inc. EPA ID Nos. IDR000002881 & ID4890008952	X02, X99, S01	1, 4a, 4b, 4c, 4l	RWMC (WMF-676)	A, C	Permit for WMF-676 - effective date - 08/18/2000.
N/A	AMWTP HWMA/RCRA Storage Permit – BNFL Inc. EPA ID No. ID4890008952	S01, T04	1	RWMC	A, C	Permit for the Type I and Type II modules - effective on 11/12/1995.
N/A	ARVFS Storage Unit	N/A	N/A	ARVFS	N/A	Closed 09/12/96
N/A	CPP-601 D Cell Storage	S01	1	CPP-601	A	Interim Status NOTE: This unit will be closed under interim status.

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
N/A	CPP-603 Storage Tank (VES-SFE-106)	S02	2	CPP-603	A	Interim Status NOTE: This unit will be closed under interim status.
N/A	CPP-627 MCC	N/A	N/A	CPP-627	N/A	DEQ approved closure on 07/20/99
N/A	CPP-633 WCF Evaporator	D80	7	CPP-633	A/D	Closed 11/02/99 as a landfill. See Volume 21 information.
N/A	CPP-633 WCF HEPA Filter Storage	D80	7	CPP-633	A/D	Closed 11/02/99 as a landfill. See Volume 21 information.
N/A	CPP-633 WCF Storage Tanks	D80	7	CPP-633	A/D	Closed 11/02/99 as a landfill. See Volume 21 information.
N/A	CPP-640 Headend Holdup Storage Tanks	S02	2	CPP-640	A	Interim Status NOTE: This unit will be closed under interim status.
N/A	CPP-663 Hot Shop Storage Tank	N/A	N/A	CPP-663	N/A	DEQ approved closure on 08/22/94
N/A	CPP-666 FAST Storage and Treatment Tanks	N/A	N/A	CPP-666	N/A	DEQ approved closure on 05/13/96
N/A	Evaporator at TAN-607A	N/A	N/A	TAN-607	N/A	DEQ approved closure on 02/25/97
N/A	Evaporator at TAN-681	N/A	N/A	TAN-681	N/A	DEQ approved closure on 12/20/96
N/A	HTRE-3 Assembly	N/A	N/A	EBR-1	N/A	DEQ approved closure on 01/31/2000
N/A	ICPP New Tank Farm	S02	2	INTEC	A/B	Interim Status NOTE: These tanks have interim status, but have not been built.

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
N/A	ICPP Percolation Ponds	N/A	N/A	INTEC	N/A	DEQ approved closure on 11/29/95
N/A	INTEC TFF NOTE: The CPP-604 Tank Farm Tanks (VES-WM-100, VES-WM-101, and VES-WM-102) will be permitted as feed, storage and bottoms tanks in the PEWE Part B Permit Application (Volume 14).	S02	2	INTEC	A/B/C	Interim Status NOTE: Tanks VES-WM-180 through VES-WM-190 operate under NON/CO and will be closed, per schedule outlined in the NON/CO.
N/A	IET Mercury Storage	N/A	N/A	TAN	N/A	DEQ approved closure on 12/20/96
N/A	ILTSF Pad 1	N/A	N/A	RWMC	N/A	DEQ approved closure on 10/24/94
N/A	PWTU	N/A	N/A	PBF/WROC	N/A	DEQ approved closure on 07/08/99
N/A	PREPP Incinerator	N/A	N/A	TAN	N/A	DEQ approved closure on 03/07/2000
N/A	PREPP Waste Stabilization	N/A	N/A	TAN	N/A	DEQ approved closure on 03/07/2000
N/A	RSTA	N/A	N/A	ARA-IV	N/A	DEQ approved closure on 10/24/94
N/A	SMC Waste Calciner, Stabilization & Storage	N/A	N/A	TAN-681	N/A	DEQ approved closure on 09/24/97
N/A	TAN-647 Sodium Storage	N/A	N/A	TAN-647	N/A	DEQ approved closure on 06/13/97
N/A	TAN-647 Waste Storage Facility	S01	1	TAN-647	A	Interim Status NOTE: This unit is being closed under interim status.
N/A	TAN-726 Chromate Water Storage	N/A	N/A	TAN-726	N/A	DEQ approved closure on 12/26/95
N/A	TAN-726A Chromate Water Treatment Unit	N/A	N/A	TAN-726A	N/A	DEQ approved closure on 12/26/95

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
N/A	TRA-610 Lead Storage	N/A	N/A	TRA-610	N/A	DEQ approved closure on 10/27/95
N/A	ASB-II (TSA-2)	N/A	N/A	RWMC	N/A	DEQ approved closure on 04/16/99
N/A	C&S Building (TSA-3)	N/A	N/A	RWMC	N/A	DEQ approved closure on 04/16/99
N/A	WEDF Storage	N/A	N/A	SPERT II	N/A	DEQ approved closure on 12/02/97
N/A	WERF Drum Feed/Blending	T04	4e	SPERT III	A/D	Interim Status NOTE: This unit is being closed under interim status with the WERF Incinerator Closure. Closure to be completed by 07/29/2003. Closure certification to be submitted to DEQ by 09/27/2003.
N/A	WERF Waste Storage/Feed Tanks	N/A	N/A	PBF/WROC	N/A	DEQ approved closure on 05/16/2000.
N/A	MWSF Repackaging (Room 102 of PER-613)	T04	4l	PBF/WROC	A, D	Interim Status NOTE: This unit is being closed under interim status.
N/A	WERF Repackaging (Room B102 of PER-609)	T04	4l	PBF/WROC	A, D	Interim Status NOTE: This unit is being closed under interim status as part of overall closure of the WERF. Closure certification to be submitted to DEQ by 09/27/2003.
N/A	WERF Waste Stabilization - includes: Drum Tumbler (Room B106 of PER-609) Double Planetary Mixer (Room 109 of PER-609)	T04	4a,c	PBF/WROC	A, D	Interim Status NOTE: This unit is being closed under interim status. Closure plan approved by the DEQ on 04/15/2002. Closure completed 10/12/2002. Certification to be submitted to DEQ with WERF Incinerator certification – due 09/27/2003.

Table 4. (continued).

Volume Number	Waste Management Process*	Process Code(s)	Process Type(s)	Location	Waste Type(s)	Unit Status
N/A	NODA Treatment	N/A	N/A	North of CFA	N/A	DEQ approved closure on 02/25/97.

* For the purposes of this work plan, the term “Waste Management Process” is used to designate a functional grouping of one or more hazardous waste management units as defined in Title 40 Code of Federal Regulations (CFR) 260.10.

NOTE: HWMA/RCRA Permit Volumes (and their associated information) that are no longer needed, due to changes in permitting strategy, have been shaded gray.

Process Codes

- S01 Container Storage
- S02 Tank Storage
- S03 Waste Pile Storage
- T01 Tank Treatment
- T02 Surface Impoundment Treatment
- T03 Incineration
- T04 Other Treatment
- X02 Miscellaneous Treatment Unit/Mechanical Processing
- X99 Miscellaneous Treatment Unit/Other Subpart X

Process Types

- 1. Container Storage
- 2. Tank Storage
- 3. Incineration
 - a. controlled air
 - b. rotary kiln
- 4. Treatment
 - a. stabilization/solidification
 - b. volume reduction - shredding/compacting/sizing
 - c. chemical treatment
 - d. thermal treatment
 - e. blending
 - f. evaporation
 - g. ion exchange
 - h. surface impoundment treatment
 - i. macroencapsulation
 - j. physical treatment (debris)
 - k. microencapsulation
 - l. repackaging
 - m. other
- 5. Waste Pile
- 6. Containment Building
- 7. Landfill

Table 4. (continued).**Waste Types**

- A. Low-Level Mixed - Any byproduct material radioactive waste that is not high-level waste, transuranic waste, or spent nuclear fuel. This definition is not dependent on radiation levels. This waste is hazardous, as defined in 40 CFR 261.
- B. High-Level Mixed - The waste radioactive material that results from the reprocessing of spent nuclear fuel. This includes the liquid waste produced directly from the reprocessing and any solid waste derived from the liquid waste that would warrant permanent isolation due to its fission product/transuranic concentrations. This waste is hazardous, as defined in 40 CFR 261.
- C. Transuranic (TRU) Mixed - Radioactive waste which is contaminated with alpha particle-emitting transuranium radionuclides (atomic number greater than 92) in concentrations greater than 100 nCi/g. The TRU designation is not dependent on the origin or the form of the waste, and is hazardous, as defined in 40 CFR 261.
- D. Hazardous - As defined in 40 CFR 261.
- E. Undetermined.

NOTE: These definitions are intended to provide a basic understanding, and not intended to be all-inclusive.

Appendix A

Descriptions of INEEL

HWMA/RCRA

Waste Management Processes

Descriptions of INEEL HWMA/RCRA Waste Management Processes

DEPARTMENT OF ENERGY -CHICAGO OPERATING CONTRACTOR - ANL-W

Units to be Permitted

RTF

The RTF will consist of a hazardous waste management unit(s) located at ANL-W. The unit(s) will be used to treat and repackage characteristic and listed remote-handled hazardous and mixed waste, prior to final disposition.

Permitted Units

EBR-II - PSS

The PSS consists of tank (system) storage located in Building ANL-767. The PSS contains sodium and sodium potassium alloy [NaK (characteristic mixed waste)] resulting from EBR-II operations. The mixed waste may be removed from the unit/facility or treated in situ, prior to final disposition.

EBR-II - SSS

The EBR-II SSS consists of tank (system) storage located in Building ANL-766. The EBR-II SSS contains sodium and NaK (characteristic mixed waste) used during EBR-II operations. The mixed waste may be removed from the unit/facility or treated in situ, prior to final disposition.

RSSF

The RSSF consists of cargo containers (permit allows for up to 32 cargo containers) located in the Outside Radioactive Storage Area, designated as Building ANL-797. The facility is permitted to store characteristic mixed waste, prior to treatment and final disposal.

RSWF

The RSWF is a controlled-access, fenced, 4-acre area located 0.5 miles northeast of EBR-II, designated as Building ANL-771. The facility is permitted to store characteristic mixed waste prior to treatment and/or final disposal.

SPF

The SPF is a new facility, consisting of container storage, container treatment, tank storage and tank treatment and designated as Building ANL-799. The facility is used to convert sodium and NaK (characteristic mixed waste) into a low-level radioactive solid sodium hydroxide waste that is not RCRA hazardous, prior to final disposition.

Building ANL-703, SSB

The SSB is a controlled-access, metal building located directly west of the RSSF, and is designated Building ANL-703. The facility is used to store sodium (characteristic waste), prior to treatment and final disposition.

HFEF

The HFEF consists of seven hazardous waste management units located on the main floor and/or the high bay area in the HFEF, Building ANL-785 and in the high bays of the TREAT facility. These units are used to store, characterize and repackage characteristic and listed mixed waste prior to shipment to the Waste Isolation Pilot Plant (WIPP), or other approved disposal facilities for final disposition.

SCMS

The SCMS consists of a treatment system and ancillary equipment located in Building ANL-793 C, E, F, and G. The SCMS will be used to store and treat sodium, sodium-potassium (NaK), corrosive and toxic metal hazardous and mixed waste prior to final disposition.

Closed Units

EBR-II Primary Tank Shutdown Coolers and Primary Purification NaK Coolant Loop

The DEQ approved completion of closure activities on 02/14/2002.

EBR-II SSPS (Cold Trap)

The DEQ approved completion of closure activities on 02/14/2002.

FACILITY OWNER AND/OR NE-ID OPERATING CONTRACTOR - BNFL Inc.

Permitted Units

AMWTP HWMA/RCRA Treatment Permit (AMWTF - Building WMF-676)

The AMWTF was designed, built, and will be operated by BNFL Inc. under a privatized contract with the NE-ID. Located at RWMC, the AMWTF (WMF-676) is a mixed waste treatment facility that primarily will be used to pretreat, treat, and repackage alpha-LLW and transuranic mixed waste retrievably-stored at INEEL, prior to final disposition.

AMWTP HWMA/RCRA Storage Permit

The AMWTP HWMA/RCRA Storage Permit currently consists of the WSF where the WMF-634 is located. Additionally the WSF is currently permitted for storage (S01) in eight Type II Modules and one Type I module. The AMWTP is also the location of the SSA. The SSA is a container storage (S01) unit located at the south end of the SWEPP

High Bay in WMF-610. Container treatment (T04) is also permitted in WMF-634 and WMF-614.

Units to Operate under Interim Status

TSA Interim Status Units

The TSA-RE (WMF-636) is a weather-tight metal building over hazardous waste container storage (S01) units TSA Pad R, Pad 1, and Pad 2. The TSA-RE building covers the waste stack, berms, and sloped earth. These units will operate under interim status until closure in 2018.

TSA RE RMF

This unit has interim status but has not yet been constructed. If this unit is not required for additional storage of retrieved waste awaiting treatment or shipping, this unit will be scheduled for RCRA administrative closure.

NE-ID OPERATING CONTRACTOR - BBWI

Units to Operate under Interim Status/Consent Order

INTEC TFF

The INTEC TFF stores (S02) liquid mixed waste from operational activities at the INTEC. The INTEC TFF consists of tanks VES-WM-180 through VES-WM-190 and tanks VES-WM-103 through VES-WM-106. The INTEC TFF tanks that are covered under the NON/CO are tanks VES-WM-180 through VES-WM-190. Specific cease use dates for these tanks are spelled out in the NON/CO. Tanks VES-WM-103 through VES-WM-106 are being addressed for closure separately from the NON/CO.

Units to be Permitted

CSSF

The CSSF stores (S02) calcined waste from the NWCF calciner. It is anticipated that the CSSF Part B Permit Application (Volume 22) will be submitted to the DEQ by 9/30/2004. The CSSF consists of the following:

- 4 tank units (CPP-729 Bin Set #1)
- 7 tanks (CPP-742 Bin Set #2)
- 7 tanks (CPP-746 Bin Set #3)
- 3 tanks (CPP-760 Bin Set #4)
- 7 tanks (CPP-765 Bin Set #5)
- 7 tanks (CPP-791 Bin Set #6)
- 7 tanks (CPP-795 Bin Set #7)

CPP-601 WG/WH Cells Storage and Treatment Tanks

This unit consists of four tanks (VES-WG-100, VES-WG-101, VES-WH-100, and VES-WH-101) used for storage and treatment (S02 and T01). These tanks receive waste primarily from laboratories and process operations in CPP-601, CPP-602, and CPP-684, located at the INTEC. The waste is sent to the PEWE Feed/Storage and Treatment Tanks prior to evaporation in the PEWE. These tanks will be permitted as part of the ILWMS - Volume 14.

CPP-604 PEWE Condensate/Feed Storage and Treatment Tanks

This unit consists of three storage (S02) and treatment (T01) tanks (VES-WL-106, VES-WL-107, and VES-WL-163). These tanks receive condensate from the PEWE, prior to the LET&D Evaporators/Fractionators. These tanks will be permitted as part of the ILWMS - Volume 14.

CPP-604 PEWE Evaporators

This unit consists of treatment [(T04) - interim status, (X99) - Part B Permit Application] in two evaporators (EVAP-WL-129 and EVAP-WL-161). After waste is treated in this unit, it is transferred to the INTEC TFF or the LET&D Facility. These evaporators will be permitted as part of the ILWMS - Volume 14.

CPP-604 PEWE Feed/Storage and Treatment Tanks

This unit consists of five tanks (VES-WL-102, VES-WL-132, VES-WL-133, VES-WL-101, and VES-WL-111), used for the storage (S02) and treatment (T01) of liquid waste, prior to being treated in the PEWE. These tanks will be permitted as part of the ILWMS - Volume 14.

CPP-604 Tank Farm Tanks

This unit currently consists of three storage (S02) tanks (VES-WM-100, VES-WM-101, and VES-WM-102). These tanks receive mixed waste for storage prior to transfer to the NWCF or the TFF. These tanks will be permitted as part of the ILWMS - Volume 14.

CPP-633 WCF

This unit was closed as a landfill. The landfill is being permitted under a HWMA/RCRA Post-Closure Permit - Volume 21.

CPP-641 Westside Holdup Storage Tanks

This unit consists of three storage tanks (VES-WL-103, VES-WL-104, and VES-WL-105). These tanks are used for storage and treatment [(S02) - under interim status and HWMA/RCRA Part B Permit Application, (T01) - under HWMA/RCRA Part B Permit Application] of liquid wastes prior to evaporation in the PEWE or transferred to the TFF. These tanks will be permitted as part of the ILWMS - Volume 14.

CPP-659 NWCF ETS

The NWCF Evaporator (EVAP-NCC-150) condenses/treats [(T04) - under interim status, (X99) - under HWMA/RCRA Part B Permit Application] the liquid waste from the TFF to reduce the volume in the TFF. The ETS (VES-NCC-101, VES-NCC-102, VES-NCC-103, VES-NCC-108, VES-NCC-116, VES-NCC-119, VES-NCC-122, VES-NCC-136, VES-NCC-150) will be permitted as part of the ILWMS - Volume 14 via a Class 3 PMR to the Volume 14 ILWMS Storage and Treatment Permit.

CPP-659 NWCF Storage and Treatment Tanks

This unit consists of six storage (S02) and treatment (T01) tanks [VES-NCC-101, VES-NCC-102, VES-NCC-103 (feed storage/treatment tanks), VES-NCC-108, VES-NCC-119, and VES-NCC-122 (storage/treatment tanks)]. These tanks perform multiple functions, such as feed preparation for the NWCF, storage of quench solutions from the NWCF off-gas cleanup system, and collection of liquid from cell floor drains. Tanks VES-NCC-101, VES-NCC-102, VES-NCC-103, VES-NCC-108, VES-NCC-116, VES-NCC-119, VES-NCC-122, VES-NCC-136, VES-NCC-152, and EVAP-NCC-150 will be permitted as part of the ILWMS - Volume 14 via a Class 3 PMR to the Volume 14 ILWMS Storage and Treatment Permit.

CPP-1618 LET&D Evaporators/Fractionators

This unit consists of two evaporators, also referred to as fractionators (FRAC-WLL-170 and FRAC-WLK-171). These evaporators/fractionators treat [(T04) - interim status, (X99) - HWMA/RCRA Part B Permit Application and store (S02) - under the Part B Permit Application] the condensate from the PEWE Evaporators. This unit will be permitted as part of the ILWMS - Volume 14.

CPP-1618 LET&D Nitric Acid Recycle Storage Tanks

Tank VES-NCR-171 stores (S02) recycled nitric acid from the LET&D prior to the nitric acid being used in for decon/debris treatment activities or being sent to the TFF. Tank VES-NCR-173 is the LET&D nitric acid head tank. These tanks are located in the CPP-659 Annex building. These units will be permitted as part of the ILWMS - Volume 14.

CPP-1618 LET&D Storage Tanks

Tank VES-WLK-197, gravity head feed tank to the LET&D Evaporators/ fractionators. Tank VES-WLL-195 collects and stores the acid reclaimed in the LET&D process for use at other INTEC facilities. These tanks will be permitted for storage (S02) as part of the ILWMS - Volume 14.

Units To be Closed

CPP-659 NWCF Calciner

The calciner (VES-NCC-105) was used to treat (T04) liquid mixed waste from the TFF by changing the waste form from liquid to calcine. The treated waste was then sent to the CSSF. Closure of this unit is dependent upon the preferred alternative stated in the

Record of Decision (ROD) for the High Level Waste and Facilities Disposition
Environmental Impact Statement.

CPP-640 Headend Holdup Storage Tanks

This unit consists of three storage (S02) tanks (VES-HW-100, VES-HW-101, VES-HW-102), which were used in the fuel dissolution process at the INTEC.

INTEC TFF

These tanks store (S02) liquid wastes from operational activities at the INTEC. Tanks VES-WM-180 through VES-WM-190 will be closed per the NON/CO. Tanks VES-WM-103 through VES-WM-106 will be closed under a separate closure activity.

CPP-603 Storage Tank

This unit consists of a tank (VES-SFE-106) used for waste storage (S02) and treatment (T01) at the INTEC.

CPP-601 D Cell Storage

This unit consists of container (S01) storage located in Building CPP-601 at the INTEC.

TAN-647 Waste Storage Facility

This process consists of a container storage (S01) unit encompassing the north half of Building TAN-647 and the asphalt pad located directly north of the building. Closure activities and P.E. certification of closure is expected to be completed during calendar year 2003.

WERF Drum Feed/Blending

The drum feed/blending (T04) unit was located on the exterior east side of Building PER-609 in Room 111A. It consisted of a concrete pad, a stainless-steel secondary containment pan, a liquid waste feed pump, two filters, and associated feed lines and piping (only up to the wall separating Rooms 111 and 111A). This unit has been physically closed and the components of this unit have been physically removed, as this unit is currently undergoing RCRA closure activities. Closure is expected to be completed during calendar year 2003.

WERF Incinerator

The WERF Incinerator was located at the WROC/PBF, within Building PER-609. The unit was comprised of an incinerator (T03) and its auxiliary equipment, that was located in Room 108 (incinerator, heat exchanger, and solid waste feed lines), Room 101 (air pollution control system and solid waste feed system), and Room B109 (ash collection and handling systems). Room B111 houses the incinerator control consoles. This unit is currently undergoing RCRA closure activities and closure is expected to be completed during calendar year 2003.

WERF Waste Stabilization System

The waste stabilization system/unit (T04) was located at the PBF/WROC, within Building PER- 609. The stabilization system included the drum tumbler, which was located in Room B106, and the double planetary mixer, which was located in Room 109. This unit was typically used to treat WERF flyash and WERF hearth ash. Treatment was performed via chemical conditioning (addition and blending chemical additives) of the waste, which resulted in binding the hazardous constituents in the waste, so that the treated waste met RCRA land disposal restrictions (LDRs). This unit has been physically closed and the components of this unit have been physically removed from the facility, as this unit is currently undergoing RCRA closure activities. Closure is expected to be completed during calendar year 2003.

WERF Repackaging

The repackaging room B102 within Building PER-609 will be closed under interim status along with the Drum Feed/Blending unit and the WERF Incinerator. Closure is expected to be completed during calendar year 2003.

MWSF Repackaging

Waste repackaging (T04) is conducted in Room 102, of the MWSF. Waste repackaging is primarily done to support mixed waste repackaging and/or waste verification/validation activities, but is also be used for other associated operational activities.

Permitted

MWSF

The MWSF (Building PER-613) consists of a container storage (S01) unit within the basement (bays 1-4) and Room 101 on the main floor of Building PER-613. The unloading area is located in the high bay on the main floor.

MWSF PSUs

This is a container storage (S01) unit consisting of multiple cargo containers. The cargo containers are located on the asphalt pad to the northeast of the MWSF building (PER-613).

WWSB

This unit is located at the PBF/WROC, within Building PER-623. The unit consists of multiple container storage (S01) rooms.

RWMC WMF-628

This is a container storage (S01) unit that consists of one Type II storage module located east of TSA-3.

NWCF Debris Treatment Processes

These processes consist of debris storage units (S01, S03), debris treatment units (T01, T04, X02, X99), and the HFLS (T01). These units are permitted as part of Volume 18.

Holdup and Collection Tanks

This unit consists of two storage (S02) and treatment (T01) tanks - VES-NCD-123 (holdup tank) and VES-NCD-129 (collection tank). These tanks are permitted as part of Volume 18.

CPP-659/1659 Storage

These units consists of container and waste pile storage areas in CPP-659/1659. Containerized solid wastes and debris are stored in these units prior to treatment in the HFLS, or prior to other treatment. These units are permitted as part of Volume 18.

CPP-666 FDP Cell Container Storage

This is a container storage (S01) unit located in the (FDP) cell. This unit is permitted as part of Volume 18.

CPP-1617 RMWSF

This unit is a container storage (S01) area for radioactive, hazardous, and mixed hazardous waste, prior to waste treatment and disposal. Containers are located within a fenced area that surrounds Building CPP-1617. This unit is permitted as part of Volume 18.

CPP-1619 HCRWSF

This unit is a storage building and a waste loading/unloading dock. The unit serves as a container storage (S01) area for RCRA hazardous and mixed waste containers prior to shipment to another permitted treatment, storage, or disposal facility. This unit is permitted as part of Volume 18.

Historical Closure Information

ARVFS - Sodium-Potassium Storage

This was a container storage (S01) unit located approximately one mile east of Lincoln Boulevard, about two and one half miles northeast of the Naval Reactors Facility (NRF). It was an underground bunker, containing two stainless-steel drums and two carbon-steel containers, within a metal dumpster. Closure was approved by the DEQ on 09/12/96.

ARVFS Chemical Treatment Unit

This chemical treatment unit located approximately one mile east of Lincoln Boulevard, about two and one half miles northeast of the NRF in an underground bunker. The unit was used to treat NaK. The unit was closed 09/09/94.

ASB II - (TSA-2)

This container storage (S01) unit was the smaller of two air-supported, storage buildings located at the RWMC. It was constructed on an asphalt pad, which covered the TSA, Pad 2 (or TSA-2). Closure was approved by the DEQ on 04/16/99.

C&S Building - (TSA-3)

This container storage (S01) unit was the larger of two air-supported, storage buildings located at the RWMC (Building WMF-612). It was constructed with steel reinforcement, on an asphalt pad, over a portion of the TSA, Pad 3 (or TSA-3). Closure was approved by the DEQ on 04/16/99.

CPP-627 MCC

This was a container storage unit (S01), located in Building CPP-627, at the INTEC. Administrative closure was approved by the DEQ on 07/20/99.

CPP-633 WCF Evaporator

This unit consisted of an evaporator (EVAP-WC-114) and its ancillary piping, which evaporated (T04) liquid mixed waste generated from fuel reprocessing activities at the INTEC. Closure was approved by the DEQ on 11/02/99, with the caveat that the substantive post-closure care requirements for the WCF be addressed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) applicable or relevant and appropriate requirements (ARARs) under the final ROD and Post-ROD Monitoring Plan. The substantive post-closure care requirements could not be negotiated, therefore the DEQ requested that a RCRA WCF Post-Closure Permit Application be developed which was subsequently submitted to the DEQ.

CPP-633 WCF Storage Tanks

This unit consisted of four storage (S02) tanks (VES-WC-100, VES-WC-101, VES-WC-108, and VES-WC-119), located in Building CPP-633, at the INTEC. Closure was approved by the DEQ on 11/02/99, with the caveat that the substantive post-closure care requirements for the WCF be addressed under the CERCLA ARARs under the final ROD and Post-ROD Monitoring Plan. The substantive post-closure care requirements could not be negotiated, therefore the DEQ requested that a RCRA WCF Post-Closure Permit Application be developed which was subsequently submitted to the DEQ.

CPP-633 WCF HEPA Filter Storage

This was a waste pile storage unit (S03), for storage of spent HEPA filters from the WCF. The unit was located in Building CPP-633, at the INTEC. Closure was approved by the DEQ on 11/02/99, with the caveat that the substantive post-closure care requirements for the WCF be addressed under the CERCLA ARARs under the final ROD and Post-ROD Monitoring Plan. The substantive post-closure care requirements could not be negotiated, therefore the DEQ requested that a RCRA WCF Post-Closure Permit Application be developed which was subsequently submitted to the DEQ.

CPP-663 Hot Shop Storage Tank

This unit was a storage tank (VES-MA-101) located in Building CPP-663, at the INTEC. This tank (S02) collected solvent waste from the hot shop. Closure was approved by the DEQ on 08/22/94.

CPP-666 FAST Storage and Treatment Tanks

This unit consisted of two storage (S02) and treatment (T01) tanks (VES-FA-141 and VES-FA-142), located in Building CPP-666, at the INTEC. Closure was approved by the DEQ on 05/13/96.

Evaporators at TAN-607A and TAN-681

These units were classified as thermal treatment units (T04). The units dried the waste in the drum in which the waste was disposed. TAN-607A closure was approved by the DEQ on 02/25/97. Closure for TAN-681 was approved by the DEQ on 12/20/96.

HCWHNF

This unit consists of two storage (S02) and treatment (T01) tanks (VES-HBF-103 and VES-HBF-104), designed to treat liquid waste from the pilot plant area storage tank (VES-HBF-105). Closure was approved by the DEQ on 09/18/2000.

HWSF

This unit was a container storage (S01) area for hazardous waste, located at CFA, Building CFA-637. Closure was approved by the DEQ on 02/04/97.

HTRE-3 Assembly

The HTRE-3 Assembly (S01) was located on a concrete pad northeast of EBR-I. Closure was approved by the DEQ on 01/31/00.

ICPP Percolation Ponds

This unit consisted of two percolation ponds (T02), located outside the INTEC fenced area. Closure was approved by the DEQ 11/29/95.

IET Mercury Storage

This unit was a container storage (S01) unit, located on a concrete pad at the south end of the IET Facility. Closure was approved by the DEQ on 12/20/96.

ILTSF - Pad 1

The ILTSF - Pad 1 was located at the RWMC, consisting of container storage (S01). Closure was approved by the DEQ on 10/24/94.

ILTSF - Pad 2

This unit consisted of a container storage (S01) unit that consists of carbon-steel cylindrical vaults that have been installed vertically in the ground and encased in sand-cement grout. This unit is located in the southwest corner of the TSA. The DEQ approved completion of closure activities on 11/12/2001.

NODA Treatment

The NODA was a tract of land about 35 acres in size, located approximately 0.6 miles northeast of the INEEL gun range. Six treatment pits (T04) and one storage area (S01) were associated with this region. Closure was approved by the DEQ on 02/25/97.

PWTU

The PWTU was an ion exchange treatment (T04) system in a transportable trailer. The unit was once located near the TAN facility and later located near the PBF reactor. The DEQ approved completion of closure activities on 07/08/99.

PREPP Incinerator

This process consisted of the rotary kiln incinerator (T03) and its auxiliary equipment, located within the middle and southern portions of Building TAN-607. The DEQ approved completion of closure activities on 03/07/00.

PREPP Waste Stabilization

This process consisted of stabilization (T04) unit equipment, located in the southern portion of Building TAN-607. The DEQ approved completion of closure activities on 03/07/00.

RSTA

The RSTA was located at the ARA-IV, in the south-central portion of the INEEL, approximately 7.5 miles east of CFA. This unit consisted of a container storage unit (S01) and a thermal treatment (T04) unit. The thermal treatment unit was used once, to treat reactive and explosive hazardous waste. Closure was approved by the DEQ on 10/24/94.

SMC Waste Calciner, Stabilization and Storage (TAN-681)

The SMC calciner (X03) unit thermally treated a slurry containing uranium oxides, salts and metallic compounds. The solidification/stabilization (T04) unit treated a depleted uranium oxide powder containing heavy metals, using Portland cement. A tank storage (S02) unit for waste storage prior to calcination and container storage (S01) unit for waste storage after calcination were also located at TAN-681. Closure was approved by the DEQ on 09/24/97.

TAN-647 Sodium Storage

This was a container storage (S01) unit, comprised of a sodium drain tank, located on a gravel-covered asphalt pad in the south half of Building TAN-647. Closure was approved by the DEQ on 06/13/97.

TAN-666 Storage and Treatment Units

Closed 10/20/94

TAN-726/726A Chromate Water Treatment and Storage

This unit consisted of a concrete vault containing two interconnected stainless-steel 50,000-gallon tanks, used for waste treatment and storage (T04, S02), within Building TAN-726. Closure was approved by the DEQ on 12/26/95.

TAN-628 THWS

This unit consisted of two container storage (S01) areas (Rooms 100 and 105) and one loading and unloading bay (Room 100A), located in the THWS building (TAN-628). DEQ acknowledges completion of the THWS closure activities on 02/20/02. On 05/06/02, the DEQ approved a Class 1 PMR for changing the THWS HWMA/RCRA permit expiration date to 06/01/02.

TRA-610 Lead Storage

This was a container storage (S01) unit in one room within Building TRA-610. Closure approved by the DEQ on 10/27/95.

WCF at RWMC

This unit was to be comprised of two container storage areas, container storage in glove boxes, and four small-scale treatment processes in glove boxes. These would have been located in a structure to be built south of Building WMF-612, within the TSA, at the RWMC. The unit was proposed, but never constructed. Administrative closure of this facility was approved by the DEQ on 09/18/00.

WEDF Storage

This consisted of a container storage (S01) unit located within the cinderblock-walled area, in the southwest corner of Building PER-612. Closure was approved by the DEQ on 12/22/97.

WERF Macroencapsulation

This treatment unit (T04) was located at the PBF/WROC, in Building PER-622. The unit prototype was constructed but not installed. The DEQ approved administrative closure of this unit on 01/03/2002.

WERF Sizing

This unit was located at the PBF/WROC, in Building PER-622. This unit was used to size radioactive low-level waste and is permitted to size mixed low-level waste. Closure was approved by the DEQ on 09/23/2002

WEDF Waste Stabilization

This treatment (T04) unit was located in the WEDF solidification room, in Building PER-612. Closure was approved by the DEQ on 12/22/97.

WERF Waste Storage/Feed Tanks

This unit storage/treatment unit (S02, T01) was never constructed. It was anticipated to be a tank system and associated piping, to expand the blending and treatment capability of the WERF Drum Feed/Blending Unit. The DEQ approved administrative closure of this unit on 05/16/00.

Appendix B

Historical Information

Historical Summary Information

Under Title 40, Code of Federal Regulations (CFR), Part 270.73(g), interim status terminates for any facility (other than land disposal or incineration) on November 8, 1992, unless the RCRA Part B permit application for the facility was submitted by November 8, 1988. Furthermore, the EPA published a clarification notice, in the September 23, 1988 Federal Register (FR), that radioactive mixed waste management units in existence on or before July 3, 1986, may be granted interim status if the RCRA Part A permit application was submitted to the EPA or authorized state by March 23, 1989. The INEEL originally submitted a Part A Permit Application to the EPA in 1980, however, at the time of this Part A submittal, it was believed that all Atomic Energy Act programs wastes were not regulated by RCRA requirements. The INEEL later submitted to the EPA several revisions to the RCRA Part A permit application for RCRA units at the INEEL that included all hazardous waste management units and many radioactive mixed waste management units potentially subject to RCRA regulations. Furthermore, a revised Part A permit application was submitted to the EPA on March 23, 1989, that included all radioactive mixed waste units potentially subject to RCRA regulations.

RCRA Part B permit applications have been submitted previously, to EPA Region X, for a number of units at the INEEL. The State of Idaho was authorized by the EPA to implement the EPA's hazardous waste management program under the HWMA effective April 9, 1990. Following this effective date, the DEQ has administered the program for the state and has authority to issue HWMA/RCRA operating permits that comply with state and federal laws. The INEEL transmitted a revised Part A permit application to the DEQ on September 27, 1990 which the DEQ approved on March 19, 1991, thereby granting interim status to all units listed in the September 1990 Part A. The number of units on the 1988 Part A permit application precluded the completion of a Part B permit application by November 8, 1988, that met all the requirements of 40 CFR 270; no schedule had yet been established by EPA Region X for completion of the Part B permit applications for the radioactive mixed waste units at the INEEL. Therefore, the INEEL HWMA/RCRA Work Plan was originally prepared and submitted to EPA Region X, in November 1988, to provide a schedule for revising the existing INEEL RCRA Part B permit application, and supplementing the application, to include the requisite information for the additional units for which final operating permits are sought. Thus, the November 1988 work plan was intended to fulfill the filing requirements to maintain interim status through 1992 and beyond, for the waste management units identified on the revised Part A permit application. In April 1989, the work plan was revised to incorporate additional radioactive mixed waste management units included in the March 1989 Part A permit. The November 1990 revision through to the present revision of the work plan incorporates

changes to the Part A permit application, changes to the Partial-Part B permits, the proposed permit application and PMR schedule, and proposed closures schedules. Each volume of the HWMA/RCRA Part B permit application will be submitted to the DEQ by the NE-ID approved management and operating (M&O) contractor. The HWMA/RCRA Part B permit applications will be prepared in a series of supplements (volumes).

The RCRA Part B permit application for the INEEL was originally submitted in October 1985, to EPA Region X, and addressed the following waste management units: HWSF at CFA-637; RMWSF at SPERT-IV; WERF Incinerator at SPERT-III; Hazardous and Mixed Waste Storage/Blending Tanks for waste feed to the WERF Incinerator at SPERT-III; and Waste Stabilization (solidification) at WERF (SPERT-III).

The 1985 RCRA Part B permit application was revised in March 1986, in response to deficiencies identified by the EPA (December 1985 NOD). The March 1986 revision also documented replacement of the Waste Feed Storage/Blending Tanks at the WERF, with a two-drum waste feed/blending station.

A supplement to the INEEL RCRA Part B permit application was submitted to EPA Region X, in November 1986, to add the PREPP Incinerator, the PREPP Waste Stabilization Unit, and associated waste storage and waste storage/blending units. The application was further revised in November 1986, in response to deficiencies identified by EPA Region X (March 1987 NOD). This revision also incorporated three units not previously addressed: WEDF Waste Stabilization at SPERT-II, and two separate storage units for liquids and solids at the PREPP. The five-volume November 1987 submittal replaced all RCRA Part B materials previously submitted.

In 1986 and 1987, land disposal units (LDUs) were added to the INEEL Part A permit application, in compliance with the Consent Order and Compliance Agreement (COCA) for the INEEL. Thirty LDUs were identified under the COCA. The COCA was later replaced by the Federal Facilities Agreement and Consent Order (FFA/CO), on December 9, 1991. The LDUs will all be evaluated under the FFA/CO. Units retaining the HWMA/RCRA LDU designation will be remediated, if necessary, under the CERCLA process, in accordance with the applicable substantive requirements of HWMA/RCRA (acceptable risk to human health or the environment).

Appendix C

HWMA/RCRA Permitting Point of Contact Matrix

HWMA/RCRA Permitting Point of Contact

Volume Number	Waste Management Unit Description	Unit Location	Unit Status	INEEL Point of Contact	NE-ID Point of Contact	DEQ Point of Contact
1	HWMA/RCRA Part A Permit Application for the INEEL	INEEL Site-wide	BBWI Responsible Operator	Pam Cunningham 208-526-0300	Tim Safford 208-526-5670	Gary Adamson 208-373-0316
1a	HWMA/RCRA Part A Permit Application for the INEEL - Pads TSA-1/TSA-R and TSA-2 and TSA-RMF at the Transuranic Storage Area - BNFL Inc.	RWMC	BNFL Inc. Responsible Operator	Tim Solle 208-557-7057	John Medema 208-526-1407	Gary Adamson 208-373-0316
2	HWMA/RCRA Part A Permit Application for the INEEL - ANL-W	INEEL - ANL-W	ANL-W Responsible Operator	Mike Holzemer 208-533-7625	Greg Bass 208-533-7184	Gary Adamson 208-373-0316
3	General Information for INEEL Waste Management Units	INEEL	BBWI operator	Pam Cunningham 208-526-0300	Tim Safford 208-526-5670	Gary Adamson 208-373-0316
4	ANL-W Storage Units: RSWF RSSF HFEF Building 703, SSB	ANL-W ANL-771 ANL-797 ANL-785 ANL-703	 Permitted 01/24/94 Permitted 01/24/94 Permitted 12/99 Permitted 12/99	 Maureen Finnerty 208-533-7924	 Greg Bass 208-533-7184	 Beth McPherson 208-373-0483
5	ILTSF - Pad 2 RWMC WMF-628 TSA-3 (SWEPP) –transferred to BNFL Inc	RWMC RWMC RWMC	Closed 11/12/2001 Permitted 11/13/95 Permitted 09/30/96	Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	Brian English 208-373-0425
6	NWCF Calciner NWCF ETS NWCF Storage & Treatment Tanks	INTEC CPP-659 INTEC CPP-659 INTEC CPP-659	Interim Status Interim Status Interim Status	Kirk Nielsen 208-526-6163	Tim Safford 208-526-5670 Don Rasch 208-526-1511	N/A
7	HWSF	CFA-637	Closed 02/04/97	Ann Boehmer 208-526-7937	N/A	N/A
8	HCWHNF	INTEC CPP-620 Annex	Closed 09/18/2000	Ann Boehmer 208-526-7937	Dave Wessman 208-526-0082	N/A

Volume Number	Waste Management Unit Description	Unit Location	Unit Status	INEEL Point of Contact	NE-ID Point of Contact	DEQ Point of Contact
9	WERF Incinerator	PBF SPERT-III	Undergoing closure activities.	Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	Brian English 208-373-0425
	WERF Waste Stabilization	PBF/SPERT-III	Interim Status - Undergoing closure activities		Don Rasch 208-526-1511	
	WERF Repackaging	PBF/SPERT-III	Interim Status - Undergoing closure activities			
10	LET&D Fractionators	INTEC CPP-1618	To be permitted	Mike Greene 208-526-1459 or 208-526-3239	Tim Safford 208-526-5670	Brian English 208-373-0425
	LET&D Storage Tank	INTEC CPP-1618	Interim Status			
	LET&D Nitric Acid Recycle Tank	INTEC CPP-1618	Interim Status			
11	MWSF	PBF/SPERT-IV	Permitted 01/27/00	Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	Beth McPherson 208-373-0483 Stephanie Carroll 208-373-0502
	MWSF PSUs	PBF/SPERT-IV	Permitted 01/27/00			
	WWSB	PBF/SPERT-III	Permitted 01/27/00			
	WERF Macroencapsulation	PBF/SPERT-III	Permitted 01/27/00			
	WERF Sizing	PBF/SPERT-III	Closed 01/03/2002			
	THWS (TAN-628)	TAN-628	Closed 09/23/2002 Closed 02/20/2002			
12	THWS (This unit was incorporated into Volume 11 in January of 1999. Volume 12 is no longer needed.)	TAN-628	See Volume 11 information	Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	N/A
13	TSA-RE – transferred to BNFL Inc	RWMC	Interim Status	Tim Solle 208-557-7057	John Medema 208-526-1407	N/A
	WCF at RWMC	RWMC	Closed 09/25/2000	Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	
14	PEWE Evaporator	INTEC CPP-604	Interim Status	Mike Greene 208-526-1459 or 208-526-3239 &/or Alan Carvo 208-526-5797 or 208-526-1170	Tim Safford 208-526-5670	Brian English 208-373-0425
	PEWE Feed Storage and Treatment Tanks	INTEC CPP-604	Interim Status			
	CPP-601 WG/WH	INTEC CPP-601	Interim Status			
	CPP-604 Tank Farm Tanks (VES-WM-100, -101, -102)	INTEC CPP-604	Interim Status			
	NWCF Evaporator Tanks System (to be permitted as part of Volume 14 at a later date as a Class 3 PMR)	INTEC CPP-659	Interim Status and new units			

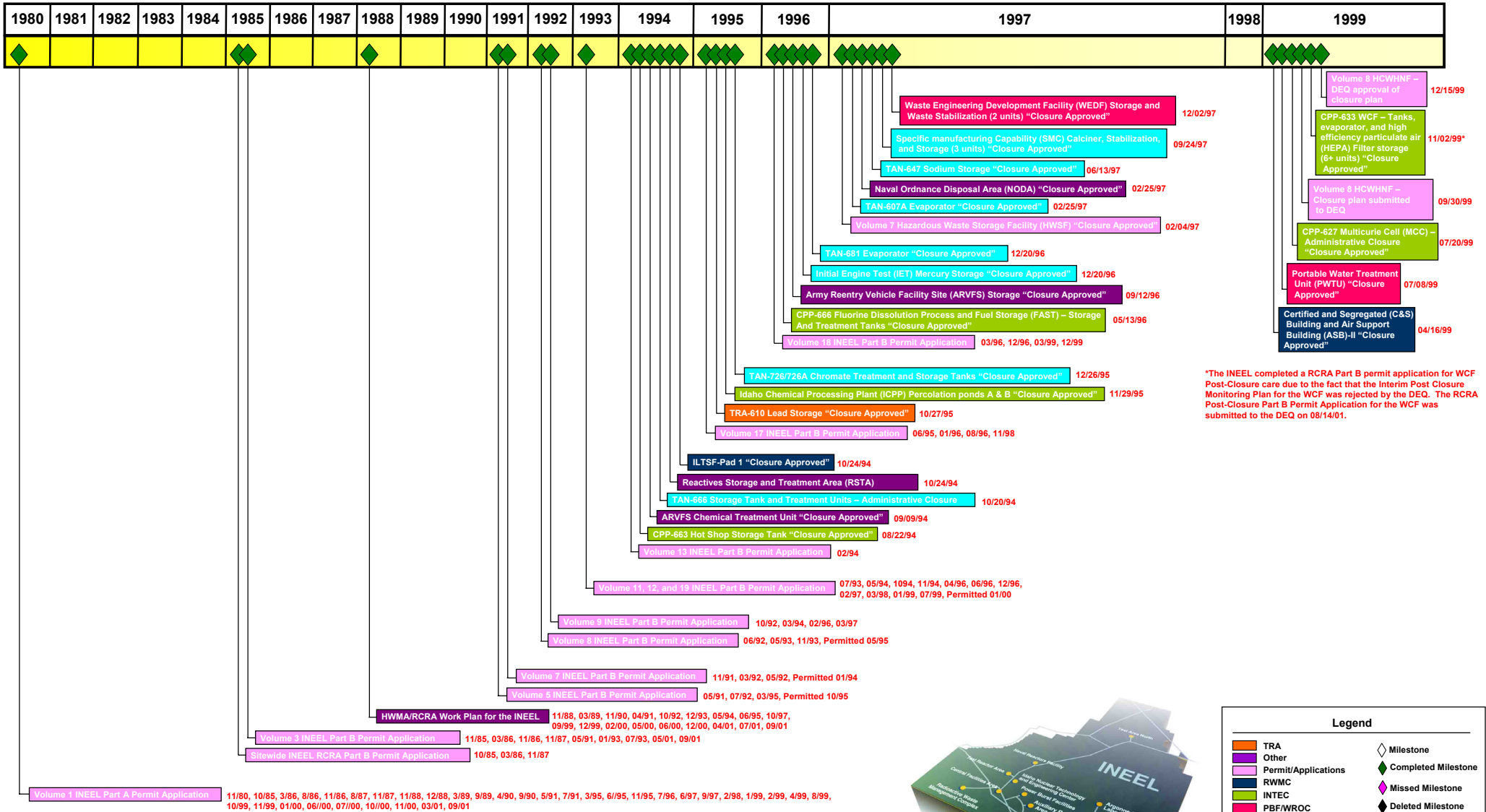
Volume Number	Waste Management Unit Description	Unit Location	Unit Status	INEEL Point of Contact	NE-ID Point of Contact	DEQ Point of Contact
15	ARVFS Sodium-Potassium Waste Treatment SCMS (This unit was incorporated into Volume 16. This volume is no longer needed.)	ANL-793 ANL-793	Closed 09/09/94 See Volume 16	Maureen Finnerty 208-533-7924	N/A	Beth McPherson 208-373-0483
16	SPF SCMS RTF PSS SSS	ANL-799 ANL-793 ANL-785 ANL-767/795 ANL-766	Permitted 04/97 Permitted 03/2001 New Unit Permitted 11/10/02 Permitted 11/10/02	Mike Holzemer 208-533-7625 Maureen Finnerty 208-533-7924 Maureen Finnerty 208-533-7924 Mike Holzemer 208-533-7625 Mike Holzemer 208-533-7625	Greg Bass 208-533-7184	Beth McPherson 208-373-0483 Dinah Reaney 208-373-0426
17	RMWSF HCRWSF	CPP-1617 CPP-1619	See Volume 18 Information	Alan Carvo 208-526-1170 or 208-526-5797 &/or Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	Beth McPherson 208-373-0483 Gary Adamson 208-373-0316
18	NWCF Debris Treatment Processes Holdup and Collection Tanks CPP-659/1659 Storage CPP-666 FDP Cell Container Storage RMWSF (CPP-1617) HCRWSF (CPP-1619)	CPP-659 CPP-659 CPP-659/1659 CPP-666 CPP-1617 CPP-1619	Permitted Permitted Permitted Permitted Permitted	Alan Carvo 208-526-1170 or 208-526-5797 &/or Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	Beth McPherson 208-373-0483 Gary Adamson 208-373-0316
19	WERF Macroencapsulation WERF Sizing (These units were incorporated into Volume 11 in January of 1999. Volume 19 is no longer needed.)	PBF/SPERT-III PBF/SPERT-III	Closed 01/03/2002 Closed 09/23/2002	Ann Boehmer 208-526-7937	Tim Safford 208-526-5670	N/A
21	WCF Post-Closure Permit Application	INTEC/CPP-633	WCF Units closed as a landfill 11/02/99	Kirk Nielsen 208-526-6163	Tim Safford 208-526-5670	Brian English 208-373-0425
22	CSSF	INTEC	Interim Status	Kirk Nielsen 208-526-6163	Tim Safford 208-526-5670	TBD
N/A BNFL Inc.	AMWTP HWMA/RCRA Storage Permit EPA ID No. ID4890008952	RWMC/WMF-634	Permitted 08/07/2000 (BNFL Inc.)	Tim Solle 208-557-7057	John Medema 208-526-1407	Gary Adamson 208-373-0316
N/A BNFL Inc.	AMWTP HWMA/RCRA Treatment Permit - EPA ID Nos IDR000002881 & ID4890008952	RWMC/WMF-676	Permitted 08/18/2000 (BNFL Inc.)	Tim Solle 208-557-7057	John Medema 208-526-1407	Brian English 208-373-0425

Appendix D

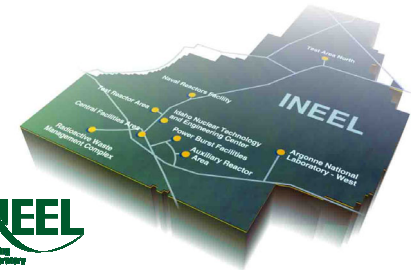
INEEL RCRA Regulatory Milestones

Regulatory Milestones

RCRA



*The INEEL completed a RCRA Part B permit application for WCF Post-Closure care due to the fact that the Interim Post Closure Monitoring Plan for the WCF was rejected by the DEQ. The RCRA Post-Closure Part B Permit Application for the WCF was submitted to the DEQ on 08/14/01.



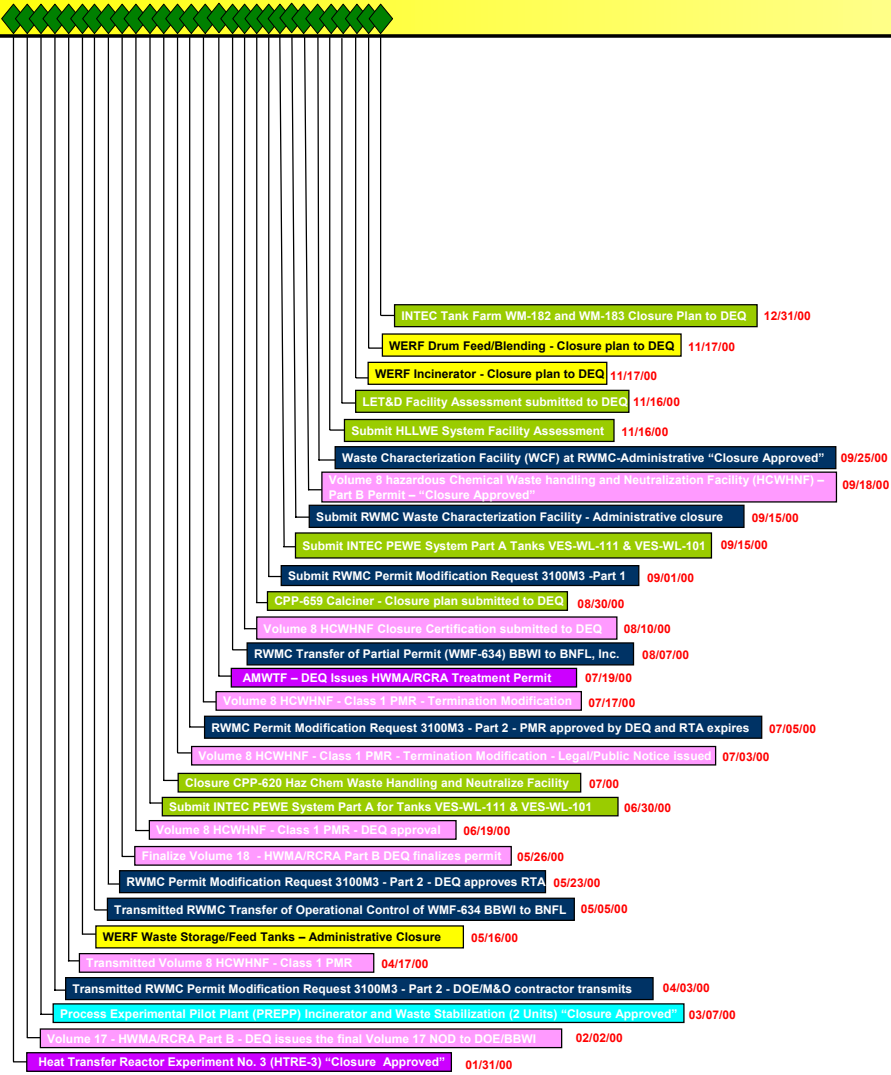
Legend

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- Other (Purple box)
- Permit/Applications (Pink box)
- RWMC (Green box)
- INTEC (Blue box)
- PBF/WROC (Yellow box)
- WERF (Red box)
- TAN/SMC (Cyan box)
- Milestone (White diamond)
- Completed Milestone (Green diamond)
- Missed Milestone (Pink diamond)
- Deleted Milestone (Black diamond)
- 00/00/00 Agreement Date
- 00/00/00 Completed Date

Regulatory Milestones

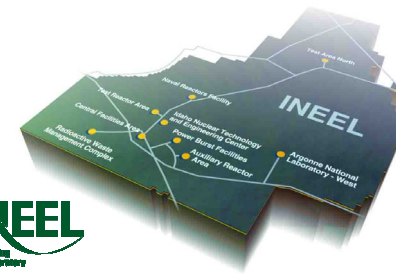
RCRA

2000



Note: Interim Milestones on permits and closures are not reflected

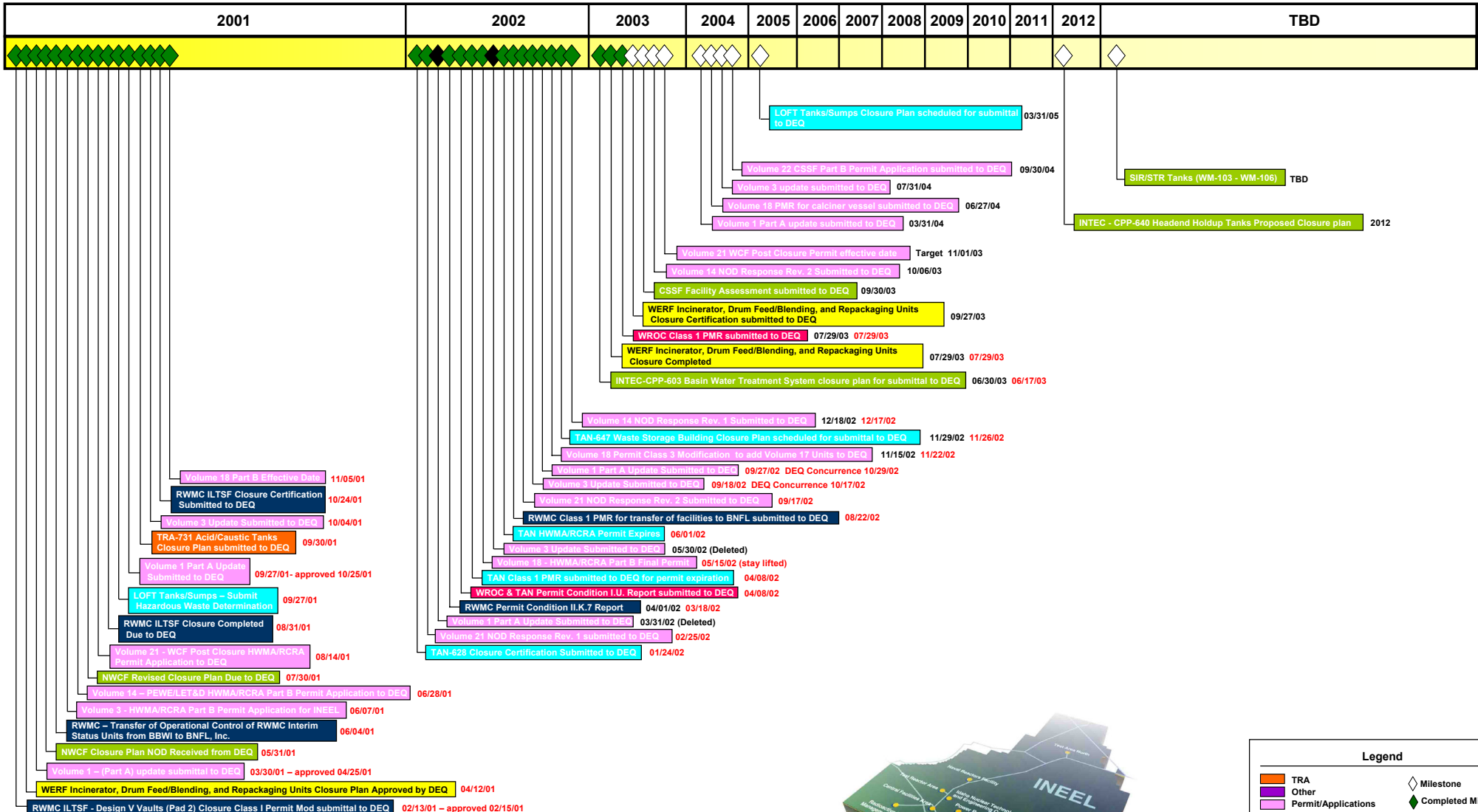
29 Completed Milestones as of 9/30/2003



Legend	
TRA	Milestone
Other	Completed Milestone
Permit/Applications	Missed Milestone
RWMC	Deleted Milestone
INTEC	
PBF/WROC	
WERF	
TAN/SMC	
00/00/00	Agreement Date
00/00/00	Completed Date

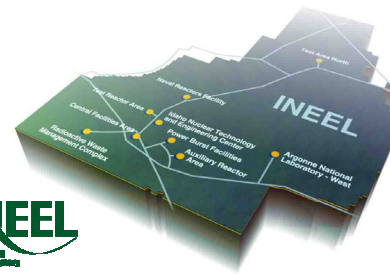
Regulatory Milestones

RCRA



Note: Interim Milestones on permits and closures are not reflected

33 Completed Milestones as of 9/30/2003



*1992 NONCO

Legend	
TRA	Milestone
Other	Completed Milestone
Permit/Applications	Missed Milestone
RWMC	Deleted Milestone
INTEC	
PBF/WROC	
WERF	
TAN/SMC	
00/00/00	Agreement Date
00/00/00	Completed Date