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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)***

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## 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   |
| 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                                      |
| CTF    | Contained Test Facility   |
| DEQ    | Department of Environmental Quality                                   |
| EBR    | Experimental Breeder Reactor  |
| EPA    | Environmental Protection Agency                                       |
| ETS    | Evaporator Tank System  |
| FAST   | Fluorinel Dissolution Process and Fuel Storage                        |
| FDP    | Fluorinel Dissolution Process   |
| 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)  |

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|        |   |
|--------|---|
| 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                              |
| ICP    | Idaho Completion Project                                      |
| 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  |
| NOD    | Notice of Deficiency  |
| NODA   | Naval Ordnance Disposal Area                                  |

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|        |   |
|--------|---|
| NON/CO | Notice of Noncompliance/Consent Order               |
| NRF    | Naval Reactors Facility                             |
| NWCF   | New Waste Calcining Facility                        |
| OU     | Operable Unit                                       |
| 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                |
| 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                                  |

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|            |   |
|------------|---|
| 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-RE RMF | TSA RE-Retrieval Modification Facility            |
| TSF        | Technical Support Facility                        |
| VCO        | Voluntary Consent Order                           |
| WCF        | Waste Calcine 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) regulated 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 regulated 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 regulated units to be closed.

Table 3 presents closed INEEL HWMA/RCRA regulated units.

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

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

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

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

**Table 1.** DEQ/INEEL Proposed Permitting Schedule.

| <b>HWMA/RCRA Permitting Items/Milestones</b>  |  | <b>Deliverable Date</b>                         |
|---|--|---|
| <b>Volume 14 – Idaho Nuclear Technology and Engineering Center (INTEC) Liquid Waste Management System (ILWMS) HWMA/RCRA Part B Permit Application for the INEEL</b> |  |   |
| 1   | The INEEL transmitted the certified Volume 14 ILMWS Permit Application to the Department of Environmental Quality (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 Notice of Deficiency (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 submitted the response to the second NOD, the ILWMS Risk Evaluation Work Plan, and the revised Volume 14 - ILMWS HWMA/RCRA Part B Permit Application on: | 10/02/2003                                      |
| 10  | The DEQ concurs with ILWMS Risk Evaluation Work Plan on:   | 12/31/2003                                      |
| 11  | The INEEL transmitted the ILWMS Risk Evaluation on:  | 07/22/2004                                      |
| 12  | The DEQ issued the Public Participation Package for the draft Volume 14 Permit on:   | 03/22/2004                                      |
| 13  | The DEQ issued a public notice and comment period of the draft permit on:  | 03/24/2004                                      |
| 14  | The DEQ held a public hearing (with 30-day advance notice) on:   | 05/19/2004                                      |
| 15  | The public comment period for the draft permit ended on:   | 05/24/2004                                      |
| 16  | The DEQ resolves public comments and issues the final Volume 14 Permit on:   | 09/16/2004 with an effective date of 10/18/2004 |



**Table 1.** (continued).

| <b>HWMA/RCRA Permitting Items/Milestones</b>  |   | <b>Deliverable Date</b> |
|---|---|-------------------------|
| <b>Volume 14 – INTEC Class 3 Permit Modification Request (PMR) to Add the Evaporator Tank System (ETS) to the Volume 14 Permit</b>  |   |                         |
| 1   | The effective date for the Volume 14 Permit - effective date is:  | 10/18/2004              |
| 2   | Per the request of the DEQ, the INEEL holds a pre-application public meeting for the Class 3 PMR by a target date of:             | 01/2005                 |
| 3   | The INEEL submits the Class 3 PMR to the DEQ by a target date of (within 180 days of the effective date of the Volume 14 Permit): | 04/15/2005              |
| 4   | The INEEL publishes legal notice for the Class 3 PMR by a target date of:   | 04/10/2005              |
| 5   | The INEEL holds a public meeting on the Class 3 PMR by a target date of:  | 05/13/2005              |
| 6   | The 60-day public comment period on the Class 3 PMR ends by a target date of:   | 06/10/2005              |
| 7   | The DEQ issues public participation package/draft permit for public comment by a target date of:                                  | 08/10/2005              |
| 8   | The DEQ holds a public hearing (with 30-day advance notice) for the Class 3 PMR by a target date of:                              | 09/10/2005              |
| 9   | The 45-day public comment period for the Class 3 PMR ends by a target date of:  | 09/25/2005              |
| 10  | The DEQ approves the Class 3 PMR and issues a final permit with a target effective date of:                                       | 12/01/2005              |
| 11  | The INEEL transmits clean-copy permit pages to the DEQ by a target date of:   | 01/15/2006              |
| <b>Volume 18 – INTEC Class 3 PMR for Additional Waste Pile Storage in Building CPP-659 to Support Partial Closure of the New Waste Calcining Facility (NWCF) Calciner System in Accordance with the Approved Closure Plan</b> |   |                         |
| 1   | Per the request of the DEQ, the INEEL held a pre-application public meeting on:   | 03/29/2004              |
| 2   | The INEEL transmitted the certified Class 3 PMR to the DEQ on:  | 06/18/2004              |
| 3   | The INEEL completes the legal notice and the public mail-out for the Class 3 PMR on:  | 06/16/2004              |
| 4   | The INEEL holds a public meeting for the Class 3 PMR on:  | 07/15/2004              |
| 5   | The 60-day public comment period for the Class 3 PMR closed on:   | 08/14/2004              |

**Table 1.** (continued).

| <b>HWMA/RCRA Permitting Items/Milestones</b>   |  | <b>Deliverable Date</b> |
|--|--|-------------------------|
| 6  | The DEQ issues a public participation package/draft permit for public comment by a target date of:   | 10/15/2004              |
| 7  | The DEQ holds a public hearing (with 30-day advance notice) for the Class 3 PMR by a target date of:   | 11/15/2004              |
| 8  | The DEQ's 45-day public comment period on the draft permit ends by a target date of:   | 12/01/2004              |
| 9  | The DEQ approves the Class 3 PMR and issues the final permit with a target effective date of:  | 04/30/2005              |
| 10   | The INEEL transmits clean-copy permit pages to the DEQ by a target date of:  | 06/14/2005              |
| <b>Volume 18 – INTEC Class 1* PMR for the Reallocation of Treatment Capacity (T01) to the High-Efficiency Particulate Air (HEPA) Filter Leach System (HFLS) and use of the HFLS for Radiological Decontamination of HEPA Filters</b> |  |                         |
| 1  | The INEEL submits the Class 1* PMR to the DEQ by a target date of:   | 09/30/2004              |
| 2  | The DEQ approves the Class 1* PMR by a target date of:   | 10/30/2004              |
| 3  | The INEEL transmits clean-copy permit pages to the DEQ by a target date of:  | 12/15/2004              |
| 4  | The INEEL notifies all persons on the official DEQ INEEL Mailing list of the approved Class 1* PMR by a target date of:  | 02/01/2005              |
| <b>Volume 22 – INTEC HWMA/RCRA Part B Permit Application for the Calcine Solids Storage Facility (CSSF)</b>  |  |                         |
| 1  | The INEEL provides public notice of the CSSF Permit Application in the Idaho Falls Post Register and completes public mail-out by:                             | 12/23/2003              |
|  | The INEEL provides public notice on KIDK radio on:   | 01/29/2004              |
| 2  | The INEEL holds a pre-application meeting for the Volume 22 CSSF permit application on:  | 01/29/2004              |
| 3  | The INEEL transmits the CSSF permit application to the DEQ by a target date of:  | 09/16/2004              |
| 4  | The DEQ reviews the CSSF permit application for initial completeness by a target date of:  | 11/16/2004              |
| 5  | 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: | 05/30/2005              |

**Table 1.** (continued).

| <b>HWMA/RCRA Permitting Items/Milestones</b>   |   | <b>Deliverable Date</b> |
|--|---|-------------------------|
| <b>Volume 5 – Radioactive Waste Management Complex (RWMC) Class 1* PMR for Modifications to WMF-628 Container Storage Unit to Support Accelerated Waste Retrieval for Shipment to the Waste Isolation Pilot Plant (WIPP) and to Provide for other Administrative/Informational Changes</b> |   |                         |
| 1  | The INEEL submits the Class 1* PMR to the DEQ by a target date of:  | 09/30/2004              |
| 2  | The DEQ approves the PMR by a target date of:   | 10/15/2004              |
| 3  | The INEEL transmits clean-copy permit pages to the DEQ by a target date of:   | 12/01/2004              |
| 4  | The INEEL notifies all persons on the official DEQ INEEL Mailing list of the approved Class 1* PMR by a target date of:   | 12/22/2004              |
| <b>Volume 5 – RWMC Class 1* PMR for Transfer of Operational Control of the Stored Waste Isolation Pilot Plant (SWEPP) Storage Facility (Building WMF-610) from BNFL to Bechtel BWXT Idaho, LLC (BBWI)</b>  |   |                         |
| 1  | The INEEL submits a Class 1* PMR and a 90-day notification for the transfer of operational control from BNFL to BBWI, to the DEQ by a target date of:               | 09/30/2004              |
| 2  | The DEQ approves the PMR by a target date of:   | 10/30/2004              |
| 3  | The INEEL transmits clean-copy permit pages to the DEQ by a target date of:   | 12/14/2004              |
| 4  | The INEEL notifies all persons on the official DEQ INEEL Mailing list of the approved Class 1* PMR by a target date of:   | 01/28/2005              |
| 5  | The operational control of WMF-610 is transferred from BNFL to BBWI by a target date of:  | 12/30/2004              |
| <b>Volume 1 - HWMA/RCRA Part A Permit Application for the INEEL - Volume 1 – BBWI - Updated to incorporate DEQ approved changes</b>  |   |                         |
| 1  | The INEEL revises Volume 1 to reflect all necessary changes and DEQ approvals from August 2003 through July 2004, to be transmitted to the DEQ by a target date of: | 09/30/2004              |
| <b>Contract Change - Class 1* PMR for Change in Operator for the Idaho Completion Project (ICP) Permitted Facilities</b>   |   |                         |
| 1  | The INEEL/ICP submits separate Class 1* PMRs for Volumes 5, 14, 18, 21 and 1 to the DEQ by a target date of:  | 04/15/2005              |
| 2  | The DEQ approves the Class 1* PMRs by a target date of:   | 05/30/2005              |
| 3  | The INEEL/ICP transitions to new operator on:   | 05/01/2005              |

**Table 1.** (continued).

| <b>HWMA/RCRA Permitting Items/Milestones</b>   |   | <b>Deliverable Date</b> |
|--|---|-------------------------|
| 4  | The INEEL transmits clean-copy permit/permit application pages to the DEQ by a target date of:  | 06/14/2005              |
| 5  | The INEEL notifies all persons on the official DEQ INEEL Mailing list of the approved Class 1* PMRs by a target date of:  | 08/25/2005              |
| <b>HWMA/RCRA Work Plan for the INEEL – Revision</b>  |   |                         |
| 1  | The INEEL revises/updates the HWMA/RCRA Work Plan for the INEEL and posts the document on the Internet @ <a href="http://www.inel.gov/publicdocuments">http://www.inel.gov/publicdocuments</a> by a target date of: | 09/30/2004              |
| <b>HWMA/RCRA Consolidated Storage and Treatment Permit for the Argonne National Laboratory – West (ANL-W) Class 3 PMR to Add the Remote Treatment Facility as a Storage and Treatment Unit</b> |   |                         |
| 1  | ANL-W completes required legal and public notifications for the Class 3 PMR, announcing a 60-day comment period and the date for the public meeting by a target date of:  | 09/30/2006              |
| 2  | ANL-W submits Class 3 PMR to DEQ (based on preliminary design) by a target date of:   | 9/30/2006               |
| 3  | ANL-W holds public information meeting on the Class 3 PMR by a target date of:  | 10/30/2006              |
| 4  | DEQ completes technical review of the Class 3 PMR by a target date of:  | To Be Determined (TBD)  |
| 5  | DEQ responds to comments received during the 60-day public comment period by a target date of:  | TBD                     |
| 6  | ANL-W provides additional final design detail to the DEQ upon request – by a target date of:  | TBD                     |
| 7  | DEQ approves the Class 3 PMR by a target date of:   | 09/30/2008              |
| 8  | ANL-W transmits clean-copy pages of the modified permit pages to the DEQ by a target date of:   | 11/15/2008              |
| 9  | ANL-W completes required public notification of DEQ's approval of the Class 3 PMR by a target date of:  | 12/30/2008              |

**Table 1.** (continued).

| <b>HWMA/RCRA Permitting Items/Milestones</b>  |  | <b>Deliverable Date</b> |
|---|--|-------------------------|
| <b>BNFL Class 1* PMR for Transfer of Operational Control of the SWEPP Storage Facility (Building WMF-610) from BNFL to BBWI</b> |  |                         |
| 1   | BNFL submits a Class 1* PMR to the DEQ by a target date of:  | 10/20/2004              |
| 2   | The DEQ approves the PMR by a target date of:  | 11/25/2004              |
| 3   | The BNFL transmits clean-copy permit pages by a target date of:  | 01/09/2005              |
| 4   | The BNFL notifies all persons on the official DEQ INEEL Mailing List of the approved Class 1* PMR by a target date of: | 01/09/2005              |
| 5   | The operational control of the SWEPP is transferred from BNFL to BBWI by a target date of:                             | 12/30/2004              |

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

| <b>RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL</b> |  |   |
|--|--|---|
| <b>BBWI CLOSURES</b>   |  |   |
| 1  | <p>INTEC – HCRWSF (CPP-1619) Closure Plan</p> <ul style="list-style-type: none"> <li>• The INEEL transmitted a notification of intent to close CPP-1619 to the DEQ on:</li> <li>• The INEEL began closure of CPP-1619 on:</li> <li>• The INEEL completes closure of CPP-1619 by a target date of:</li> <li>• The INEEL transmits P.E. certification of closure to the DEQ by a target date of:</li> <li>• The DEQ approves completion of closure activities as specified in the approved closure plan by a target date of:</li> </ul>  | <p>06/10/2004</p> <p>06/26/2004</p> <p>12/23/2004</p> <p>02/02/2005</p> <p>TBD</p>  |
| 2  | <p>INTEC – NWCF Calciner System Closure Plan:</p> <ul style="list-style-type: none"> <li>• DEQ reviewed the revised closure plan (submitted on 03/29/01) and transmitted a second NOD to the INEEL on:</li> <li>• The INEEL transmitted the revised closure plan to the DEQ on:</li> <li>• The INEEL received the third NOD on:</li> <li>• The INEEL submits a revised closure plan to the DEQ on:</li> <li>• The DEQ submitted the closure plan and public participation package to the Environmental Protection Agency (EPA) Region X for their review/concurrence on:</li> <li>• The closure plan was approved by the DEQ on:</li> <li>• The final P.E. certification is due to the DEQ by a target date of:</li> </ul> | <p>05/31/2001</p> <p>07/26/2001</p> <p>01/28/2002</p> <p>04/29/2002</p> <p>08/16/2002</p> <p>11/25/2002</p> <p>10/25/2004</p> |
| 3  | <p>INTEC – CPP-601 D-Cell Container Storage Area Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL submitted the closure plan to the DEQ on:</li> <li>• The INEEL received a NOD on the closure plan from the DEQ on:</li> <li>• The INEEL transmitted the revised closure plan to the DEQ on:</li> <li>• The DEQ issued the closure plan for public notice on:</li> <li>• Public notice/comment period of the closure plan ends by a target date of:</li> </ul>  | <p>09/29/2003</p> <p>09/29/2003</p> <p>12/16/2003</p> <p>02/11/2004</p> <p>03/08/2004</p> <p>04/07/2004</p>                   |

**Table 2.** (continued).

| <b>RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL</b> |  |  |
|--|--|--|
| 3<br>(cont)  | <ul style="list-style-type: none"> <li>• The DEQ approved the closure plan on:</li> <li>• The INEEL transmitted the P.E. certification of closure to the DEQ on:</li> <li>• The DEQ approves completion of closure activities as specified in the approved closure plan by a target date of:</li> </ul>  | <p>04/15/2004</p> <p>08/11/2004</p> <p>TBD</p>   |
| 4  | <p>INTEC – CPP-603 Basin Water Treatment System (VCO item) Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL submitted the closure plan to the DEQ on:</li> <li>• The INEEL received a NOD on the closure plan from the DEQ on:</li> <li>• The INEEL transmitted the revised closure plan to the DEQ on:</li> <li>• The DEQ provided comments to the INEEL on the revised closure plan on:</li> <li>• The INEEL transmits the revised closure plan to the DEQ by a target date of:</li> </ul>   | <p>06/23/2003</p> <p>10/22/2003</p> <p>02/26/2004</p> <p>05/06/2004</p> <p>09/30/2004</p>  |
| 5  | INTEC – CPP-603 Storage Tank (VES-SFE-106) Closure Plan is scheduled to be submitted to the DEQ by a target date of:   | 10/18/2004   |
| 6  | 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):   | TBD  |
| 7  | <p>INTEC – INTEC Tank Farm Facility (TFF) Closure Plan (submittals due per the NON/CO):</p> <ul style="list-style-type: none"> <li>• 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"> <li>- INEEL received second NOD from the DEQ on 8/27/01. INEEL received an extension to submit revised plan on:</li> <li>- INEEL transmits revised plan and second NOD response to the DEQ on:</li> <li>- DEQ provides public-notice of the plan with an addendum on:</li> <li>- INEEL received approval of the closure plan on:</li> <li>- Closure activities have commenced – closure completion date:</li> </ul> </li> <li>• 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"> <li>- 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:</li> <li>- The INEEL responded to the NOD/revised the closure plan by a target date of:</li> </ul> </li> </ul> | <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>09/24/2003</p> |

**Table 2.** (continued).

| <b>RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL</b> |   |   |
|--|---|---|
| 7<br>(cont)  | <ul style="list-style-type: none"> <li>- The DEQ issued the closure plan for public notice on:</li> <li>- The public comment period for the closure plan ended on:</li> <li>- The INEEL received DEQ approval of the closure plan on:</li> <li>• Phase 3 – Tank VES-WM-181 and VCO tanks VES-WM-103, VES-WM-104, VES-WM-105, and VES-WM-106 closure plan was submitted to the DEQ on:                             <ul style="list-style-type: none"> <li>- The DEQ issues the closure plan for public notice on:</li> <li>- The DEQ holds a public hearing for the closure plan on:</li> </ul> </li> <li>• Phase 4 – Tank VES-WM-180 closure plan submitted to the DEQ on:                             <ul style="list-style-type: none"> <li>- The DEQ issues the closure plan for public notice on:</li> <li>- The DEQ holds a public hearing for the closure plan on:</li> </ul> </li> </ul> | <p>11/14/2003</p> <p>12/31/2003</p> <p>03/01/2004</p> <p>04/15/2004</p> <p>06/16/2004</p> <p>09/09/2004</p> <p>06/29/2004</p> <p>08/10/2004</p> <p>09/09/2004</p> |
| 8  | <p>Test Area North (TAN)-020 Heat Transfer Reactor Experiment (HTRE)-3 Mercury Spill at TAN Contained Test Facility (CTF)/Loss-of-Fluid Test (LOFT) Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL submitted the closure plan to the DEQ on:</li> <li>• The INEEL received the 1<sup>st</sup> NOD on the closure plan from the DEQ on:</li> <li>• The INEEL receives a 30-day extension and submits a revised closure plan to the DEQ on:</li> <li>• The INEEL receives a 2<sup>nd</sup> NOD on the closure plan from the DEQ on:</li> <li>• The INEEL submits a revised closure plan to the DEQ on:</li> <li>• The DEQ deems the closure plan adequate and issues it for public comment by a target date of:</li> </ul>  | <p>12/04/2003</p> <p>02/20/2004</p> <p>05/13/2004</p> <p>06/14/2004</p> <p>08/26/2004</p> <p>TBD</p>  |
| 9  | <p>TAN/Technical Support Facility (TSF) Intermediate-Level Radioactive Waste Management System (ILRWMS) Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL transmitted a partial closure approach letter to the DEQ for the three ILRWMS subsystems on:</li> <li>• Phase I – Treatment Subsystem (TAN-616) Closure Plan (VCO Closure) submitted to the DEQ on:                             <ul style="list-style-type: none"> <li>- The INEEL received a NOD on:</li> <li>- The INEEL transmitted a revised closure plan to the DEQ by:</li> </ul> </li> </ul>  | <p>07/19/2002</p> <p>03/18/2003</p> <p>06/01/2003</p> <p>09/30/2003</p>   |



**Table 2.** (continued).

| <b>RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL</b>                     |  |            |
|--|--|------------|
| 9<br>(cont)  | - The DEQ issued the closure plan for public notice on:  | 03/08/2004 |
|  | - The public comment period of the closure plan ended on:  | 04/07/2004 |
|  | - The INEEL receives approval of the closure plan from the DEQ on:   | 06/07/2004 |
|  | - The INEEL completes closure by a target date of:   | 09/10/2005 |
|  | - The INEEL transmits P.E. certification of closure to the DEQ by a target date of:  | 11/10/2005 |
|  | - The DEQ approves completion of closure activities as specified in the approved closure plan by a target date of:   | TBD        |
|  | • Phase II – Feed Subsystem (V-tanks) Closure Plan submitted [per the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Record of Decision (ROD) for the TAN Operable Unit (OU) 1-10] to the DEQ on: | 01/28/2003 |
|  | - Public comment period ended on:  | 08/04/2003 |
|  | - The INEEL received approval of the closure plan on:  | 09/04/2003 |
|  | - The INEEL submits a modified closure plan to the DEQ on:   | 06/07/2004 |
|  | - The INEEL submits a revised modified closure plan to the DEQ on:   | 08/04/2004 |
|  | - The DEQ approves the revised modified closure plan by a target date of:  | 09/07/2004 |
|  | • Phase III – ILRWMS Holding Tank System (PM-2A Tanks) Closure Plan submitted (per the CERCLA ROD for the TAN OU 1-10) to the DEQ on:  | 07/24/2003 |
|  | - The INEEL received a NOD on the closure plan from the DEQ on:  | 09/29/2003 |
|  | - The INEEL submitted a revised closure plan to the DEQ on:  | 02/18/2004 |
|  | - The DEQ issues the closure plan for public notice/comment by a target date of:   | 04/12/2004 |
|  | - The public comment period ends by a target date of:  | 05/12/2004 |
|  | - The INEEL received closure plan approval from the DEQ on:  | 06/07/2004 |
|  | - The INEEL completes closure by a target date of:   | 04/23/2005 |
|  | - The INEEL submits P.E. certification of closure to the DEQ by a target date of:  | 06/22/2005 |
| - The DEQ approves completion of closure activities as specified in the approved closure plan by a target date of: | TBD  |            |

**Table 2.** (continued).

| <b>RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL</b> |   |   |
|--|---|---|
| 10   | <p>INTEC Process Equipment Waste Evaporator (PEWE) – Evaporator Condensate System, Tank System INTEC-049 (VCO Site Tank-005) Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL submitted the closure plan to the DEQ on:</li> <li>• The INEEL received a NOD on the closure plan from the DEQ on:</li> <li>• The INEEL submitted the revised closure plan to the DEQ on:</li> <li>• The DEQ issued the closure plan for public notice/comment on:</li> <li>• The DEQ approves the closure plan by a target date of:</li> </ul>   | <p>10/06/2003</p> <p>12/09/2003</p> <p>02/26/2004</p> <p>06/16/2004</p> <p>TBD</p>  |
| 11   | <p>TAN-607 Demineralized Water System, VCO System TAN-031 Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL submitted the closure plan to the DEQ on:</li> <li>• The DEQ issued the closure plan for public notice/comment on:</li> <li>• The INEEL receives approval of the closure plan from the DEQ on:</li> <li>• The INEEL submits the P.E. certification of closure to the DEQ on:</li> <li>• The DEQ approves completion of closure activities as specified in the approved closure plan by a target date of:</li> </ul>  | <p>09/23/2003</p> <p>03/08/2004</p> <p>04/23/2004</p> <p>08/11/2004</p> <p>11/2004</p>  |
| 12   | <p>INTEC SFE-VES-20 Hot Waste Tank System Closure Plan (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"> <li>• DEQ approved VES-SFE-20 Closure Plan:</li> <li>• INEEL submitted a modified closure plan to DEQ:</li> <li>• INEEL submitted another modified closure plan to DEQ:</li> <li>• DEQ reviewed and approved the modification(s) on:</li> <li>• INEEL submits revised sampling plan to the DEQ on:</li> <li>• DEQ approved sample report on:</li> <li>• INEEL completes tank sampling:</li> <li>• INEEL submits sample report to DEQ:</li> </ul> | <p>05/2002</p> <p>09/2002</p> <p>05/13/2003</p> <p>06/19/2003</p> <p>06/18/2004</p> <p>03/08/2004</p> <p>12/31/2005</p> <p>04/30/2006</p> |

**Table 2.** (continued).

| <b>RCRA CLOSURES, VCO ACTIONS AND NON/CO ACTIONS RELATED TO FACILITY CLOSURES AT THE INEEL</b> |  |  |
|--|--|--|
| 12<br>(cont)   | <ul style="list-style-type: none"> <li>• DEQ approves sample report:</li> <br/> <li>• INEEL completes closure activities in accordance with the CERCLA OU3-13 ROD:</li> <br/> <li>• INEEL submits closure certification to the DEQ by:</li> </ul>  | <p>05/30/2006</p><br><p>Schedule as outlined in the Remedial Action Work Plan</p><br><p>60 days after completion of closure activities</p> |
| 13   | <p>CPP-637/620 (Plus VCO CPP-097) Closure Plan:</p> <ul style="list-style-type: none"> <li>• The INEEL submits a notice of intent to close to the DEQ on:</li> <br/> <li>• The INEEL submits closure plan to the DEQ on:</li> <br/> <li>• The DEQ reviews closure plan and issues a NOD on:</li> <br/> <li>• The INEEL revises the closure plan and submits to the DEQ on:</li> <br/> <li>• The DEQ public comment period of the closure plan ends by a target date of:</li> <br/> <li>• The DEQ approves closure plan by a target date of:</li> </ul> | <p>05/15/2004</p><br><p>07/01/2004</p><br><p>08/02/2004</p><br><p>08/20/2004</p><br><p>10/30/2004</p><br><p>TBD</p>                        |

**Table 3.** Closed INEEL Waste Management Processes.

| <b>Unit Process Name</b>   | <b>Location</b>  | <b>DEQ Approved Closure Date</b> |
|--|--|----------------------------------|
| Radioactive Sodium Storage Facility (RSSF)   | ANL-W  | 08/03/2004                       |
| Mixed Waste Storage Facility (MWSF) Repackaging Unit   | Waste Experimental Reduction Facility (WERF)/Waste Reduction Operations Complex (WROC) | 05/10/2004                       |
| MWSF, WERF Waste Storage Building (WWSB), and MWSF Portable Storage Units (PSUs)   | WERF/WROC  | 04/13/2004                       |
| TAN-647 Storage Building   | TAN  | 01/09/2004                       |
| WERF Incinerator (Building PER-609), WERF Drum Feed/Blending Unit (PER-609, Room 111A), WERF Stabilization Units (PER-609, Rooms B106 and 109), WERF Repackaging Unit (PER-609, Room B102) | WERF/WROC  | 09/30/2003                       |
| 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                       |
| 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                       |

**Table 3.** (continued).

| <b>Unit Process Name</b>  | <b>Location</b>                        | <b>DEQ Approved Closure Date</b> |
|---|--|----------------------------------|
| Process Experimental Pilot Plant (PREPP) Incinerator and Waste Stabilization (2 Units)      | TAN                                    | 03/07/2000                       |
| HTRE – No. 3  | EBR-I                                  | 01/31/2000                       |
| CPP-633 Waste Calcine Facility (WCF)  | INTEC                                  | 11/02/1999*                      |
| CPP-627 Multicurie Cell (MCC) – Administrative Closure                                      | INTEC                                  | 07/20/1999                       |
| Portable Water Treatment Unit (PWTU)  | WROC/TAN                               | 07/08/1999                       |
| Certified and Segregated (C&S) Building and Air Support Building (ASB)-II                   | RWMC                                   | 04/16/1999                       |
| Waste Engineering Development Facility (WEDF) Storage and Waste Stabilization (2 units)     | WROC/PBF                               | 12/02/1997                       |
| Specific Manufacturing Capability (SMC) Calciner, Stabilization, and Storage (3 units)      | TAN                                    | 09/24/1997                       |
| TAN-647 Sodium Storage  | TAN                                    | 06/13/1997                       |
| Naval Ordnance Disposal Area (NODA)   | North of Central Facilities Area (CFA) | 02/25/1997                       |
| TAN-607A Evaporator   | TAN                                    | 02/25/1997                       |
| Hazardous Waste Storage Facility (HWSF)   | CFA                                    | 02/04/1997                       |
| TAN-681 Evaporator  | TAN                                    | 12/20/1996                       |
| Initial Engine Test (IET) Mercury Storage   | North of TAN                           | 12/20/1996                       |
| Army Reentry Vehicle Facility Site (ARVFS) Storage  | South of TAN                           | 09/12/1996                       |
| CPP-666 Fluorinel Dissolution Process and Fuel Storage (FAST) – Storage and Treatment Tanks | INTEC                                  | 05/13/1996                       |
| TAN-726/726A Chromate Treatment and Storage Tanks   | TAN                                    | 12/26/1995                       |
| Idaho Chemical Processing Plant (ICPP) Percolation Ponds A & B                              | INTEC                                  | 11/29/1995                       |
| TRA-610 Lead Storage  | TRA                                    | 10/27/1995                       |

**Table 3.** (continued).

| <b>Unit Process Name</b>  | <b>Location</b>              | <b>DEQ Approved Closure Date</b> |
|---|------------------------------|----------------------------------|
| ILTSF – Pad 1   | RWMC                         | 10/24/1994                       |
| Reactives Storage and Treatment Area (RSTA)                       | Auxiliary Reactor Area (ARA) | 10/24/1994                       |
| TAN-666 Storage Tank and Treatment Units – Administrative Closure | TAN                          | 10/20/1994                       |
| ARVFS Chemical Treatment Unit                                     | South of TAN                 | 09/09/1994                       |
| CPP-663 Hot Shop Storage Tank                                     | INTEC                        | 08/22/1994                       |

\*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. The DEQ subsequently issued the WCF Post-Closure Permit – with an effective date of 10/16/2003.

**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       | September 2003 Revision – Requisite information accepted by DEQ on 02/06/2004. The next revision of this document is expected to be transmitted to the DEQ by 09/30/2004. |
| 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<br>(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. 11 (July 2004) was transmitted to the DEQ on 7/30/2004.                                       |
| Volume 4   | ANL-W Storage Units:  |                      |                              | ANL-W    |               |   |
| <b>NOTE:</b> See ANL-W Consolidated Permit Information (This volume is now considered inactive.) | RSWF  | S01                  | 1                            | ANL-771  | A/C           | Permitted 01/24/1994  |
|  | RSSF  | N/A                  | N/A                          | ANL-797  | N/A           | Permitted 01/24/1994. Completion of closure activities approved by the DEQ on 08/03/2004.   |
|  | HFEF  | S01, T04             | 1, 2, 4a, 4l, 4m*            | ANL-785  | A/C           | Permitted 12/1999<br><b>NOTE:</b> 4m* (other treatment) = neutralization  |
|  | SSB   | S01                  | 1                            | ANL-703  | A/D           | Permitted 12/1999   |

**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             | RWMC – South west corner of TSA                             | N/A           | Permitted 11/13/1995. Closure approved by the DEQ on 11/12/2001.   |
|   | *Waste Storage Facility (WSF)  | S01             | 1               | RWMC – Type I/II Modules                                    | A/C           | Permitted 11/13/1995   |
|   | *SWEPP Storage Area (SSA)      | S01             | 1               | RWMC – WMF-610  | A/C           | Permitted 09/30/1996   |
|   | Type II Module – WMF-628       | S01             | 1               | RWMC – WMF-628  | A/C           | Permitted 11/13/1995<br><br>*NOTE: Operational control of the Type II module WMF-634 was transferred to BNFL Inc. on 08/07/2000. 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., 01/01/2003. |
| Volume 6<br>(This volume is now considered inactive.) | NWCF Calciner                  | T04             | 4d              | INTEC – CPP-659   | A/B/C         | Interim Status<br>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           | INTEC – 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 01/24/1994. Closure approved by the DEQ on 02/04/1997.   |
| Volume 8  | HCWHNF                         | N/A             | N/A             | INTEC -- CPP-620 Annex                                      | N/A           | Permitted 05/01/1995. Closure approved by the DEQ on 09/18/2000.   |
| Volume 9  | WERF Incinerator               | N/A             | N/A             | WROC/PBF PER-609  | N/A           | DEQ approved completion of closure activities on 09/30/2003.   |
|   | WERF Waste Stabilization       | N/A             | N/A             | WROC/PBF – Special Power Excursion Reactor Test (SPERT)-III | N/A           | DEQ approved completion of closure activities on 09/30/2003.   |



**Table 4.** (continued).

| Volume Number  | Waste Management Process*                                    | Process Code(s) | Process Type(s) | Location         | Waste Type(s) | Unit Status   |
|--|--|-----------------|-----------------|------------------|---------------|---|
| Volume 10<br>(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  |
|  | PEWE Condensate/Feed Storage Tanks**                         | S02, T01        | 2, 4c           | INTEC – CPP-604  | A             | Interim Status  |
|  | FAST Debris Storage*   | S01             | 1               | INTEC – CPP-604  | A             | Permitted – Effective Date 11/05/2001   |
|  | NWCF ETS**   | S02, X99        | 4m              | INTEC – CPP-659  | A             | Interim Status  |
|  | NWCF HFLS*   | S02, T01        | 2, 4i           | INTEC – CPP-659  | A             | Permitted – Effective date 11/05/2001   |
|  |  |                 |                 |                  |               | <p><b>*NOTE:</b> These units have been incorporated into Volume 18 Part B Permit.</p> <p><b>**NOTE:</b> 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  | N/A             | N/A             | WROC/PBF – PER-613  | N/A           | Permitted 01/27/2000. Completion of closure activities approved by the DEQ on 04/13/2004.                               |
|  | MWSF PSUs   | N/A             | N/A             | WROC/PBF – SPERT-IV | N/A           | Permitted 01/27/2000. Completion of closure activities approved by the DEQ on 04/13/2004.                               |
|  | WWSB  | N/A             | N/A             | WROC/PBF – PER-623  | N/A           | Permitted 01/27/2000. Completion of closure activities approved by the DEQ on 04/13/2004.                               |
|  | 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. Completion of closure activities approved by the DEQ on 09/23/2002.                               |
|  | THWS**<br>* <b>NOTE:</b> Incorporated from Vol. 19 Part B Permit Appl.<br>** <b>NOTE:</b> 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 approved by the DEQ on 02/20/2002.                  |
| Volume 12<br>(This Volume is now considered inactive.) | THWS<br><b>NOTE:</b> This information was incorporated into Vol. 11 Part B permit application, per NOD from DEQ.                        | N/A             | N/A             | TAN-628             | N/A           | <b>Incorporated into Volume 11</b>  |
| Volume 13<br>(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     | ILWMS  |                 |                 | INTEC                |               |                             |
|               | CPP-604 PEWE Evaporators<br>(EVAP-WL-129, EVAP-WL-161)   | T04             | 4m              | INTEC – CPP-604      | A             | Interim Status              |
|               | CPP-604 PEWE Feed Storage and Treatment Tanks<br>(VES-WL-101, -102, -111, -132, -133)            | S02, T01        | 2, 4c           | INTEC – CPP-604      | A             | Interim Status              |
|               | CPP-604 Bottoms Collection Tanks<br>(VES-WL-101, VES-WL-111)                                     | S02, T01        | 2, 4c           | INTEC – CPP-604      | A             | Interim Status              |
|               | CPP-604 PEWE Condensate Feed Storage Tanks<br>(VES-WL-106, -107, -163)                           | S02, T01        | 2, 4c           | INTEC – CPP-604      | A             | Interim Status              |
|               | CPP-604 Condensate Tanks<br>(VES-WL-134, -131, -108)   | S02             | 2               | INTEC – CPP-604      | A             | VCO units – to be permitted |
|               | CPP-604 Evaporator Head Tank<br>(VES-WL-109)   | S02             | 2               | INTEC – CPP-604      | A             | VCO unit – to be permitted  |
|               | CPP-601 WG/WH Cells Storage and Treatment Tanks<br>(VES-WG-100, -101, VES-WH-100, -101)          | S02, T01        | 2, 4c           | INTEC – CPP-601      | A             | Interim Status              |
|               | CPP-641 Westside Holdup Storage Tanks<br>(VES-WL-103, -104, -105)                                | S02             | 2               | INTEC – CPP-641      | A             | Interim Status              |
|               | CPP-604 Process Waste Liquid Tanks<br>(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<br>(VES-WM-100, -101, -102)  | S02             | 2               | INTEC – CPP-604      | A             | Interim Status              |
|               | LET&D Fractionators<br>(FRAC-WLL-170, FRAC-WLK-171)  | T04             | 4m              | INTEC – CPP-1618     | A             | VCO unit – Interim Status   |
|               | LET&D Nitric Acid Recycle Tank System<br>(VES-NCR-171, -173)                                     | S02             | 2               | INTEC – CPP-659Annex | A             | VCO unit – to be permitted  |
|               | LET&D Waste Feed Head Tank<br>(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<br>(continued)                               | LET&D Acid Fractionator Bottoms Tank<br>(VES-WLL-195)  | S02                | 2                | INTEC – CPP-1618 | A             | VCO unit – to be permitted                                       |
|  | <b>NOTE:</b> NWCf ETS Units<br>To be permitted under Volume 14 in the future:<br>VES-NCC-101, -102, -103, -104, -108, -116,<br>-119, -122, -136, 152, EVAP-NCC-150,<br>VES-NCC-152 | S02, T01, T04, X99 | 2, 4c            | INTEC – CPP-659  | A             | Both Interim Status and new units to be permitted in the future. |
| Volume 15<br>(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 09/09/1994                                |
|  | 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            |               |  |
|  | EBR-II Primary Sodium System (PSS)   | S01, S02, T01      | 1,2,4c           | ANL-767/795      | A             | Permitted 11/10/2002   |
|  | EBR-II Secondary Sodium System (SSS)   | S02, T01           | 2, 4c            | ANL-766          | A             | Permitted 11/10/2002   |
| Volume 17<br>(This volume is now considered inactive.) | Radioactive Mixed Waste Staging Facility (RMWSF)   | S01                | 1                | INTEC – CPP-1617 | A/D           | Permitted – See Volume 18 information.                           |
|  | HCRWSF   | S01                | 1                | INTEC – CPP-1619 | A/D           | Permitted – See Volume 18 information.                           |
|  | CPP-601/627 Container Storage<br><b>NOTE:</b> CPP-601/627 unit removed from Volume 17, per NOD from DEQ.   | S01                | 1                | INTEC – CPP-601  | B             | Interim Status. DEQ approved closure of CPP-627 on 07/20/1999.   |

**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<br>(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                | INTEC – CPP-659/1659 | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | CPP-659/1659 NWCF Waste Pile Storage<br>(Rooms 216, 308, 309, 323, 326, 416, and 418)  | S03             | 5                | INTEC – CPP--659     | A/C/D/  | Permitted – Effective Date 11/05/2001  |
|  | NWCF Tank Treatment<br>(SH-NCD-933, SH-NCD-934, UC-NCD-921)  | T01             | 4c               | INTEC – CPP--659     | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | NWCF HFLS<br>(VES-NCD-141, VES-NCD-142)  | S02, T01        | 4c               | INTEC – CPP-659      | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | NWCF Container Treatment<br>(VES-NCD-138, TK-NC-136, TK-NC-137)  | T04             | 1, 4c, 4j, 4l    | INTEC – CPP-659      | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | FAST Container Storage<br>[Fuel Dissolution Process (FDP) Cell]  | S01             | 1                | INTEC – CPP-666      | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | NWCF Holdup and Collection Tanks<br>(VES-NCD-123, VES-NCD-129)   | S02, T01        | 2, 4c            | INTEC – CPP-659      | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | NWCF Miscellaneous Treatment Unit<br>Scarification/Spalling (Steam Spray Booth & Glovebox [Room 418])  | X02             | 4c, j            | INTEC – CPP-659      | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | NWCF Miscellaneous Treatment Unit<br>Chemical/Physical Extraction (Steam Spray Booth – Room 418, Decon Cubicle – Rooms 421 and 422, and Decon Cell – Room 308)                                 | X99             | 4c, j            | INTEC – CPP-659      | A/C/D   | Permitted – Effective Date 11/05/2001  |
|  | RMWSF  | S01             | 1                | INTEC – CPP-1617     | A/D   | Permitted (as of 9/03/2003) – Effective Date 11/05/2001                              |
| HCRWSF   | S01  | 1               | INTEC – CPP-1619 | A/D                  | Permitted (as of 9/03/2003) – Effective Date 11/05/2001 |  |
|  |  |                 |                  |                      |   | <b>NOTE:</b> DEQ issued order affirming the Volume 18 HWMA/RCRA Permit on 05/15/2002 |
| Volume 19<br>(This volume is now considered inactive.) | WERF Macroencapsulation  | N/A             | N/A              | SPERT III            | N/A   | <b>Incorporated into Volume 11</b>   |
|  | WERF Sizing  | N/A             | N/A              | SPERT III            | N/A   | <b>Incorporated into Volume 11</b>   |

**Table 4.** (continued).

| Volume Number  | Waste Management Process*  | Process Code(s)  | Process Type(s)   | Location   | Waste Type(s)  | Unit Status  |
|--|--|--|---|--|--|--|
| Volume 20<br>(This volume is now considered inactive.) | Mercury Retort   | N/A  | N/A   | WROC/PBF   | N/A  | <b>NOTE:</b> This unit will not be constructed.  |
| Volume 21  | WCF – Post Closure Permit  | D80  | 7   | INTEC  | A/D  | Originally, the WCF units were closed as a landfill – 11/20/99. WCF Post-Closure Permit issued with an effective date of 10/16/2003.   |
| Volume 22  | CSSF   | S02  | 2   | INTEC  | B  | Interim Status. CSSF HWMA/RCRA Permit Application to be submitted to DEQ by 09/30/2004.  |
| N/A  | HMWA/RCRA Consolidated Storage and Treatment Permit for the ANL-W<br><br>RWWF<br>HFEF<br>SSB<br>CESB<br>SCMS<br>SPF<br>TREAT<br>RTF (new unit)                           | S01<br>S01, T04<br>S01<br>S01, T04<br>S01, S02, T01, T04<br>S01, S02, T01, T04<br>S01, T04<br>S01, S02, T01, T04 | 1<br>1, 2, 4a, 4l, 4m*<br>1<br>1, 2, 4a, 4l, 4m<br>1, 2, 4a, 4c, 4j, 4l, 4m<br>1, 2, 4a, 4c<br>1, 2, 4a, 4l, 4m*<br>1, 2, 4 | ANL-771<br>ANL-785<br>ANL-703<br>ANL-794<br>ANL-797<br>ANL-799<br>ANL-720<br>ANL-785 | A/C<br>A/C<br>A/D<br>A/C/D<br>A/C/D<br>A/D<br>A/C/D<br>A/C/D | Consolidated Reapplication<br><br>Permitted 6/30/2004<br>Permitted 6/30/2004<br>Permitted 6/30/2004<br>Permitted 6/30/2004<br>Permitted 6/30/2004<br>Permitted 6/30/2004<br>Permitted 6/30/2004<br>Planned to be permitted 09/2008 |
| N/A  | Advanced Mixed Waste Treatment Project (AMWTP) HWMA/RCRA Treatment Permit – BNFL Inc. Environmental Protection (EPA) Identification Numbers: 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 Identification Number: ID4890008952   | S01, T04   | 1   | RWMC   | A, C   | Permit for the Type I and Type II modules – effective on 11/12/1995.   |

**Table 4.** (continued).

| Volume Number | Waste Management Process*                | Process Code(s) | Process Type(s) | Location        | Waste Type(s) | Unit Status   |
|---------------|--|-----------------|-----------------|-----------------|---------------|---|
| N/A           | ARVFS Storage Unit                       | N/A             | N/A             | ARVFS           | N/A           | Closed 09/12/1996   |
| N/A           | CPP-601 D Cell Storage                   | S01             | 1               | INTEC – CPP-601 | A             | Interim Status<br><b>NOTE:</b> This unit will be closed under interim status. |
| N/A           | CPP-603 Storage Tank (VES-SFE-106)       | S02             | 2               | INTEC – CPP-603 | A             | Interim Status<br><b>NOTE:</b> This unit will be closed under interim status. |
| N/A           | CPP-627 MCC                              | N/A             | N/A             | INTEC – CPP-627 | N/A           | DEQ approved closure on 07/20/1999  |
| N/A           | CPP-633 WCF Evaporator                   | D80             | 7               | INTEC – CPP-633 | A/D           | Closed 11/02/1999 as a landfill. See Volume 21 information.                   |
| N/A           | CPP-633 WCF HEPA Filter Storage          | D80             | 7               | INTEC – CPP-633 | A/D           | Closed 11/02/1999 as a landfill. See Volume 21 information.                   |
| N/A           | CPP-633 WCF Storage Tanks                | D80             | 7               | INTEC – CPP-633 | A/D           | Closed 11/02/1999 as a landfill. See Volume 21 information.                   |
| N/A           | CPP-640 Headend Holdup Storage Tanks     | S02             | 2               | INTEC – CPP-640 | A             | Interim Status<br><b>NOTE:</b> This unit will be closed under interim status. |
| N/A           | CPP-663 Hot Shop Storage Tank            | N/A             | N/A             | INTEC – CPP-663 | N/A           | DEQ approved closure on 08/22/1994  |
| N/A           | CPP-666 FAST Storage and Treatment Tanks | N/A             | N/A             | INTEC – CPP-666 | N/A           | DEQ approved closure on 05/13/1996  |
| N/A           | Evaporator at TAN-607A                   | N/A             | N/A             | TAN-607         | N/A           | DEQ approved closure on 02/25/1997  |
| N/A           | Evaporator at TAN-681                    | N/A             | N/A             | TAN-681         | N/A           | DEQ approved closure on 12/20/1996  |

**Table 4.** (continued).

| Volume Number | Waste Management Process*   | Process Code(s) | Process Type(s) | Location | Waste Type(s) | Unit Status  |
|---------------|---|-----------------|-----------------|----------|---------------|--|
| 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<br><b>NOTE:</b> These tanks have interim status, but have not been built.   |
| N/A           | ICPP Percolation Ponds  | N/A             | N/A             | INTEC    | N/A           | DEQ approved closure on 11/29/1995   |
| N/A           | INTEC TFF<br><b>NOTE:</b> 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<br><b>NOTE:</b> 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 12/20/1996   |
| N/A           | ILTSF Pad 1   | N/A             | N/A             | RWMC     | N/A           | DEQ approved closure on 10/24/1994   |
| N/A           | PWTU  | N/A             | N/A             | PBF/WROC | N/A           | DEQ approved closure on 07/08/1999   |
| 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 10/24/1994   |
| N/A           | SMC Waste Calciner, Stabilization & Storage   | N/A             | N/A             | TAN-681  | N/A           | DEQ approved closure on 09/24/1997   |
| N/A           | TAN-647 Sodium Storage  | N/A             | N/A             | TAN-647  | N/A           | DEQ approved closure on 06/13/1997   |
| N/A           | TAN-647 Waste Storage Facility  | N/A             | N/A             | TAN-647  | N/A           | DEQ approved closure on 01/09/2004   |



**Table 4.** (continued).

| Volume Number | Waste Management Process*   | Process Code(s) | Process Type(s) | Location     | Waste Type(s) | Unit Status   |
|---------------|---|-----------------|-----------------|--------------|---------------|---|
| N/A           | TAN-726 Chromate Water Storage  | N/A             | N/A             | TAN-726      | N/A           | DEQ approved closure on 12/26/1995                          |
| N/A           | TAN-726A Chromate Water Treatment Unit  | N/A             | N/A             | TAN-726A     | N/A           | DEQ approved closure on 12/26/1995                          |
| N/A           | TRA-610 Lead Storage  | N/A             | N/A             | TRA-610      | N/A           | DEQ approved closure on 10/27/1995                          |
| N/A           | ASB-II (TSA-2)  | N/A             | N/A             | RWMC         | N/A           | DEQ approved closure on 04/16/1999                          |
| N/A           | C&S Building (TSA-3)  | N/A             | N/A             | RWMC         | N/A           | DEQ approved closure on 04/16/1999                          |
| N/A           | WEDF Storage  | N/A             | N/A             | SPERT II     | N/A           | DEQ approved closure on 12/02/1997                          |
| N/A           | WERF Drum Feed/Blending   | N/A             | N/A             | SPERT III    | N/A           | DEQ approved completion of closure activities on 09/30/2003 |
| 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)  | N/A             | N/A             | PBF/WROC     | N/A           | DEQ approved completion of closure activities on 05/10/2004 |
| N/A           | WERF Repackaging (Room B102 of PER-609)   | N/A             | N/A             | PBF/WROC     | N/A           | DEQ approved completion of closure activities on 09/30/2003 |
| N/A           | WERF Waste Stabilization - includes:<br>Drum Tumbler (Room B106 of PER-609)<br>Double Planetary Mixer (Room 109 of PER-609) | N/A             | N/A             | PBF/WROC     | N/A           | DEQ approved completion of closure activities on 09/30/2003 |
| N/A           | NODA Treatment  | N/A             | N/A             | North of CFA | N/A           | DEQ approved closure on 02/25/1997                          |

\* 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) Part 260.10.

**NOTE:** HWMA/RCRA Permit Volumes (and their associated information) that have received closure approval from the DEQ or that are no longer needed, due to changes in permitting strategy, have been shaded gray.

**Table 4.** (continued).

**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                   | h. surface impoundment treatment |
| b. volume reduction – shredding/compacting/sizing | i. macroencapsulation            |
| c. chemical treatment                             | j. physical treatment (debris)   |
| d. thermal treatment                              | k. microencapsulation            |
| e. blending                                       | l. repackaging                   |
| f. evaporation                                    | m. other                         |
| g. ion exchange                                   |                                  |
| 5. Waste Pile                                     |                                  |
| 6. Containment Building                           |                                  |
| 7. Landfill                                       |                                  |

**Waste Types**

- A. Low-Level Mixed – Any byproduct material radioactive waste that it 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

##### CESB

The CESB consists of a container storage and container treatment unit located in Building 794. The CESB will be used to store and treat characteristic and listed hazardous and mixed waste prior to final disposition.

##### 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.

##### 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.

SSB, Building ANL-703

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 is used to store and treat sodium, sodium-potassium (NaK), corrosive and toxic metal hazardous and mixed waste prior to final disposition.

TREAT

The TREAT consists of a container storage and container treatment unit located in Building 720. The unit is used to store, characterize, and repackage characteristic and listed mixed waste prior to shipment to the WIPP, or other approved disposal facilities for 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.

RSSF

The DEQ approved completion of closure activities on 08/03/2004.

## **FACILITY OWNER AND/OR DEPARTMENT OF ENERGY IDAHO OPERATIONS OFFICE OPERATING CONTRACTOR – BNFL Inc.**

### **Permitted Units**

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

The Advanced Mixed Waste Treatment Facility (AMWTF) was designed, built, and will be operated by BNFL Inc. under a privatized contract with the Department of Energy Idaho Operations Office. 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 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. Treatment (T04) is permitted in WMF-615, WMF-634, and WMF-635.

### **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.

## **DEPARTMENT OF ENERGY IDAHO OPERATIONS OFFICE 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 Number 1)
- 7 tanks (CPP-742 Bin Set Number 2)
- 7 tanks (CPP-746 Bin Set Number 3)
- 3 tanks (CPP-760 Bin Set Number 4)
- 7 tanks (CPP-765 Bin Set Number 5)
- 7 tanks (CPP-791 Bin Set Number 6)
- 7 tanks (CPP-795 Bin Set Number 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 PEWE Process Condensate Tanks

This unit consists of three tanks (VES-WL-108, VES-WL-131, and VES-WL-134), used for the storage (S02) of condensate from the PEWE evaporators. These tanks will be permitted as part of the ILWMS – Volume 14.

### CPP-604 PEWE Process Waste Liquid Tanks

This system consists of eight tanks (VES-WL-135, VES-WL-136, VES-WL-137, VES-WL-138, VES-WL-39, VES-WL-142, VES-WL-144, and VES-WL-150), that are used to collect/store (S02) hazardous waste liquid from CPP-604, CPP-649, and associated valve boxes. 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-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-104, 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-104, 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.

### 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 (effective date – 11/05/2001).

## **Permitted Units**

### RWMC WMF-628

This is a container storage (S01) unit that consists of one Type II Storage Module located east of TSA-3. The Volume 5 Permit was issued with an effective date of 11/12/1995.

### 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. The Volume 18 Permit was issued with an effective date of 11/05/2001.

### 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. The Volume 18 Permit was issued with an effective date of 11/05/2001.

CPP-659/1659 Storage

These units consist 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. The Volume 18 Permit was issued with an effective date of 11/05/2001.

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. The Volume 18 Permit was issued with an effective date of 11/05/2001.

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. The Volume 18 Permit was issued with an effective date of 11/05/2001.

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. The Volume 18 Permit was issued with an effective date of 11/05/2001.

CPP-633 WCF

This unit was originally closed as a landfill. The landfill was then subsequently permitted under a HWMA/RCRA Post-Closure Permit – Volume 21. The Volume 21 Post-Closure Permit was issued with an effective date of 10/16/2003.

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 postclosure 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 postclosure 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. The DEQ then issued the Volume 21 – WCF HWMA/RCRA Post-Closure Permit with an effective date of 10/16/2003.

### 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 postclosure care requirements for the WCF be addressed under the CERCLA ARARs under the final ROD and Post-ROD Monitoring Plan. The substantive postclosure 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. The DEQ then issued the Volume 21 WCF – HWMA/RCRA Post-Closure Permit with an effective date of 10/16/2003.

### 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 postclosure care requirements for the WCF be addressed under the CERCLA ARARs under the final ROD and Post-ROD Monitoring Plan. The substantive postclosure 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. The DEQ then issued the Volume 21 WCF – HWMA/RCRA Post-Closure Permit with an effective date of 10/16/2003.

## **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 09/12/1996.

### 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 09/09/1994.

### 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 04/16/1999.

### 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 04/16/1999.

### 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 07/20/1999.

### 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 08/22/1994.

### 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 05/13/1996.

### 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 12/20/1996.

### 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 02/04/1997.

### 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 01/31/2000.

### ICPP Percolation Ponds

This unit consisted of two percolation ponds (T02), located outside the INTEC fenced area. Closure was approved by the DEQ 11/29/1995.

### 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 12/20/1996.

### ILTSF – Pad 1

The ILTSF – Pad 1 was located at the RWMC, consisting of container storage (S01). Closure was approved by the DEQ on 10/24/1994.

### 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.

### MWSF

The MWSF (Building PER-613) consisted 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 was located in the high bay on the main floor. The DEQ approved completion of closure activities on 04/13/2004.

### MWSF PSUs

This was a container storage (S01) unit consisting of multiple cargo containers. The cargo containers were located on the asphalt pad to the northeast of the MWSF building (PER-613). The DEQ approved completion of closure activities on 04/13/2004.

### MWSF Repackaging

Waste repackaging (T04) was conducted in Room 102, of the MWSF. Waste repackaging was primarily done to support mixed waste repackaging and/or waste verification/validation activities, but was also used for other associated operational activities. The DEQ approved completion of closure activities on 05/10/2004.

### 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 02/25/1997.

### 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 07/08/1999.

### 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 03/07/2000.

### 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 03/07/2000.

### RSSF

The RSSF consisted of cargo containers located in the Outside Radioactive Storage Area, designated as ANL-797. The facility was used for container storage (S01). The DEQ approved completion of closure activities on 08/03/2004.

### 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 10/24/1994.

### 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 09/24/1997.

### 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 06/13/1997.

### TAN-666 Storage and Treatment Units

Closed 10/20/1994

### 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 12/26/1995.

### 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 02/20/2002. On 05/06/2002, the DEQ approved a Class 1 PMR for changing the THWS HWMA/RCRA permit expiration date to 06/01/2002.

### 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. The DEQ approved completion of closure activities on 01/09/2004.

### TRA-610 Lead Storage

This was a container storage (S01) unit in one room within Building TRA-610. Closure approved by the DEQ on 10/27/1995.

### 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 09/25/2000.



### 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 12/02/1997.

### 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 12/02/1997.

### 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). The DEQ approved completion of closure activities on 09/30/2003.

### 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 housed the incinerator control consoles. The DEQ approved completion of closure activities on 09/30/2003.

### 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 Repackaging

The repackaging room B102 within Building PER-609 was closed under interim status along with the Drum Feed/Blending unit and the WERF Incinerator. The DEQ approved completion of closure activities on 09/30/2003.

### 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

### 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). The DEQ approved completion of closure activities on 09/30/2003.

### 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 05/16/2000.

### WWSB

This unit was located at the PBF/WROC, within Building PER-623. The unit consisted of multiple container storage (S01) rooms. The DEQ approved completion of closure activities for the WWSB on 04/13/2004.

## **Appendix B**

### **Historical Summary Information**

## Historical Summary Information

Under Title 40, 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 program 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 regulated 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 permit application. 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 application. 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 Department of Energy Idaho Operations Office 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           | DOE Idaho Operations Office 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<br>208-526-0300   | Tim Safford<br>208-526-5670                                  | Gary Adamson<br>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  | Neil Brill<br>208-557-7316       | John Medema<br>208-526-1407                                  | Gary Adamson<br>208-373-0316   |
| 2             | HWMA/RCRA Part A Permit Application for the INEEL - ANL-W  | INEEL - ANL-W   | ANL-W Responsible Operator  | Mike Holzemer<br>208-533-7625    | Greg Bass<br>208-533-7184                                    | Gary Adamson<br>208-373-0316   |
| 3             | General Information for INEEL Waste Management Units   | INEEL   | BBWI operator   | Pam Cunningham<br>208-526-0300   | Tim Safford<br>208-526-5670                                  | Gary Adamson<br>208-373-0316   |
| 4             | ANL-W Storage Units<br><br>RSWF<br><br>RSSF (closed 08/03/2004)<br><br>HFEF<br><br>SSB, Building 703                                   | ANL-W<br><br>ANL-771<br><br>ANL-797<br><br>ANL-785<br><br>ANL-703 | <b>See Consolidated Storage and Treatment Permit for the ANL-W</b>    | Maureen Finnerty<br>208-533-7924 | Greg Bass<br>208-533-7184                                    | Beth McPherson<br>208-373-0483 |
| 5             | ILTSF - Pad 2<br><br>RWMC WMF-628<br><br>TSA-3 SWEPP – transferred to BNFL Inc   | RWMC<br><br>RWMC<br><br>RWMC                                      | Closed 11/12/2001<br><br>Permitted 11/13/95<br><br>Permitted 09/30/96 | Ann Boehmer<br>208-526-7937      | Tim Safford<br>208-526-5670                                  | Brian English<br>208-373-0425  |
| 6             | NWCF Calciner<br><br>NWCF ETS<br><br>NWCF Storage & Treatment Tanks  | INTEC CPP-659<br><br>INTEC CPP-659<br><br>INTEC CPP-659           | Interim Status<br><br>Interim Status<br><br>Interim Status            | Kirk Nielsen<br>208-526-6163     | Tim Safford<br>208-526-5670<br><br>Don Rasch<br>208-526-1511 | N/A                            |
| 7             | HWSF   | CFA-637   | Closed 02/04/97   | Ann Boehmer<br>208-526-7937      | N/A  | N/A                            |
| 8             | HCWHNF   | INTEC CPP-620 Annex   | Closed 09/18/2000   | Ann Boehmer<br>208-526-7937      | Dave Wessman<br>208-526-0082                                 | N/A                            |
| 9             | WERF Incinerator<br><br>WERF Waste Stabilization<br><br>WERF Repackaging   | PBF SPERT-III<br><br>PBF/SPERT-III<br><br>PBF/SPERT-III           | Closed 09/30/2003<br><br>Closed 09/30/2003<br><br>Closed 09/30/2003   | Ann Boehmer<br>208-526-7937      | Tim Safford<br>208-526-5670<br><br>Don Rasch<br>208-526-1511 | Brian English<br>208-373-0425  |

| Volume Number | Waste Management Unit Description   | Unit Location  | Unit Status  | INEEL Point of Contact   | DOE Idaho Operations Office Point of Contact                   | DEQ Point of Contact  |
|---------------|---|--|--|--|--|---|
| 10            | LET&D Fractionators<br>LET&D Storage Tank<br>LET&D Nitric Acid Recycle Tank   | INTEC CPP-1618<br>INTEC CPP-1618<br>INTEC CPP-1618   | To be permitted<br>Interim Status<br>Interim Status  | Mike Greene<br>208-526-1459 or<br>208-526-3239                                       | Tim Safford<br>208-526-5670                                    | Brian English<br>208-373-0425   |
| 11            | MWSF<br>MWSF PSUs<br>WWSB<br>WERF Macroencapsulation<br>WERF Sizing<br>THWS (TAN-628)   | PBF/SPERT-IV<br>PBF/SPERT-IV<br>PBF/SPERT-III<br>PBF/SPERT-III<br>PBF/SPERT-III<br>TAN-628 | Closed 04/13/2004<br>Closed 04/13/2004<br>Closed 04/13/2004<br>Closed 01/03/2002<br>Closed 09/23/2002<br>Closed 02/20/2002 | Ann Boehmer<br>208-526-7937  | Tim Safford<br>208-526-5670                                    | Beth McPherson<br>208-373-0483<br><br>Stephanie Carroll<br>208-373-0502 |
| 12            | THWS<br><br>(This unit was incorporated into Volume 11 in January of 1999. Volume 12 is no longer needed.)  | TAN-628  | <b>See Volume 11 information</b>   | Ann Boehmer<br>208-526-7937  | Tim Safford<br>208-526-5670                                    | N/A   |
| 13            | TSA-RE – transferred to BNFL Inc<br><br>WCF at RWMC   | RWMC<br><br>RWMC   | Interim Status<br><br>Closed 09/25/2000  | Tim Solle<br>208-557-7057<br><br>Ann Boehmer<br>208-526-7937                         | John Medema<br>208-526-1407<br><br>Tim Safford<br>208-526-5670 | N/A   |
| 14            | ILWMS<br>PEWE Evaporator<br>PEWE Feed Storage & Treatment Tanks<br>CPP-601 WG/WH<br>CPP-604 Tank Farm Tanks<br>(VES-WM-100, -101, -102)<br>NWCF Evaporator Tanks System (to be permitted as part of Volume 14 at a later date as a Class 3 PMR) | INTEC CPP-604<br>INTEC CPP-604<br>INTEC CPP-601<br>INTEC CPP-604<br>INTEC CPP-659          | Interim Status<br>Interim Status<br>Interim Status<br>Interim Status<br>Interim Status and new units                       | Mike Greene<br>208-526-1459 or<br>208-526-3239<br>&/or<br>Alan Carvo<br>208-526-1170 | Tim Safford<br>208-526-5670                                    | Brian English<br>208-373-0425   |
| 15            | ARVFS Sodium-Potassium Waste Treatment<br><br>SCMS<br>(This unit was incorporated into Volume 16. This volume is no longer needed.)   | ANL-793<br><br>ANL-793   | Closed 09/09/94<br><br>See Volume 16   | Maureen Finnerty<br>208-533-7924   | N/A  | Beth McPherson<br>208-373-0483  |



| Volume Number | Waste Management Unit Description   | Unit Location   | Unit Status  | INEEL Point of Contact   | DOE Idaho Operations Office Point of Contact | DEQ Point of Contact                                     |
|---------------|---|---|--|--|--|--|
| 16            | SPF<br>SCMS<br>RTF<br>PSS<br>SSS  | ANL-799<br>ANL-793<br>ANL-785<br>ANL-767/795<br>ANL-766               | <b>See Consolidated Storage and Treatment Permit for the ANL-W</b>                     | Mike Holzemer 208-533-7625<br>Maureen Finnerty 208-533-7924<br>Maureen Finnerty 208-533-7924<br>Mike Holzemer 208-533-7625<br>Mike Holzemer 208-533-7625 | Greg Bass 208-533-7184                       | Beth McPherson 208-373-0483                              |
| 17            | RMWSF<br>HCRWSF   | CPP-1617<br>CPP-1619  | <b>See Volume 18 Information</b>   | Alan Carvo 208-526-1170<br>&/or<br>Ann Boehmer 208-526-7937  | Tim Safford 208-526-5670                     | Beth McPherson 208-373-0483<br>Gary Adamson 208-373-0316 |
| 18            | NWCF Debris Treatment Processes<br>Holdup and Collection Tanks<br>CPP-659/1659 Storage<br>CPP-666 FDP Cell Container Storage<br>RMWSF (CPP-1617)<br>HCRWSF (CPP-1619) | CPP-659<br>CPP-659<br>CPP-659/1659<br>CPP-666<br>CPP-1617<br>CPP-1619 | Permitted<br>Permitted<br>Permitted<br>Permitted<br>Permitted<br>Permitted             | Alan Carvo 208-526-1170<br>&/or<br>Ann Boehmer 208-526-7937  | Tim Safford 208-526-5670                     | Beth McPherson 208-373-0483<br>Gary Adamson 208-373-0316 |
| 19            | WERF Macroencapsulation<br>WERF Sizing<br><br>(These units were incorporated into <b>Volume 11</b> in January of 1999. Volume 19 is no longer needed.)                | PBF/SPERT-III<br>PBF/SPERT-III  | Closed 01/03/2002<br>Closed 09/23/2002   | Ann Boehmer 208-526-7937   | Tim Safford 208-526-5670                     | N/A  |
| 21            | WCF Post-Closure Permit   | INTEC/CPP-633   | WCF Units closed as a landfill 11/02/99<br>WCF Units Post-Closure Permitted 10/16/2003 | Shawn Rosenberger 208-526-4989   | 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  |

| Volume Number       | Waste Management Unit Description   | Unit Location            | Unit Status  | INEEL Point of Contact           | DOE Idaho Operations Office Point of Contact | DEQ Point of Contact              |
|---------------------|---|--------------------------|--|----------------------------------|--|-----------------------------------|
| N/A<br>ANL-W        | HWMA/RCRA Consolidated Treatment and Storage Permit for the ANL-W                         |                          |  |                                  |  |                                   |
|                     | RSWF  | ANL-771                  | Reapplication - Permitted 6/30/04                  | Maureen Finnerty<br>208-533-7924 | Gregg Bass<br>208-533-7184                   | Beth McPherson<br>208-373-0483    |
|                     | HFEF  | ANL-784                  | Permitted 6/30/04                                  |                                  |  |                                   |
|                     | SSB   | ANL-703                  | Permitted 6/30/04                                  |                                  |  |                                   |
|                     | CESB  | ANL-794                  | Permitted 6/30/04                                  |                                  |  |                                   |
|                     | SCMS  | ANL-797                  | Permitted 6/30/04                                  |                                  |  |                                   |
|                     | SPF   | ANL-799                  | Permitted 6/30/04                                  |                                  |  |                                   |
|                     | TREAT   | ANL-720                  | Permitted 6/30/04                                  |                                  |  |                                   |
|                     | RTF   | ANL-785                  | New Unit – to be permitted                         |                                  |  |                                   |
| N/A<br>BNFL<br>Inc. | AMWTP HWMA/RCRA Storage Permit – EPA Identification Number ID4890008952                   | WSF, WMF-634 and WMF-610 | Permitted – Transferred to BNFL Inc - 08/07/2000   | Neil Brill<br>208-557-7316       | John Medema<br>208-526-1407                  | Stephanie Carroll<br>208-373-0137 |
| N/A<br>BNFL<br>Inc. | AMWTP HWMA/RCRA Treatment Permit – EPA Identification Numbers IDR000002881 & ID4890008952 | RWMC/WMF-676             | Permitted – Effective Date 08/18/2000<br>BNFL Inc. | Neil Brill<br>208-557-7316       | John Medema<br>208-526-1407                  | Stephanie Carroll<br>208-373-0137 |