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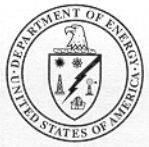
January 2001



U.S. Department of Energy
Idaho Operations Office

INEEL Storm Water Pollution Prevention Plan for Industrial Activities

INEEL
IDAHO NATIONAL ENGINEERING & ENVIRONMENTAL LABORATORY

DOE/ID-10431
Revision 41

INEEL Storm Water Pollution Prevention Plan for Industrial Activities

Published January 2001

Prepared for the
U.S. Department of Energy
Idaho Operations Office

REVISION LOG

Rev.	Date	Affected Pages	Revision Description
0	4/1/93	All	The INEL met the regulatory deadline of April 1, 1993, for development of a storm water pollution prevention plan.
1	9/15/93	All	The INEL met the regulatory deadline of October 1, 1993, for implementation of a storm water pollution prevention plan.
2	01/96	7.1.3-1 - Annex 3	The RWMC section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluations.
3	01/96	7.1.1-1 - Annex 3	The SMC section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluations.
4	02/96	7.1.5.1 - Annex 3	The TRA section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluations.
5	02/96	7.1.2-1 - Annex 3	The PBF section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluations.
6	02/96	7.2.1-1 – Annex 3	The ANL section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluation.
7	02/96	7.3-1	The NRF section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluations.
8	03/96	7.1.4-1 – Annex 3	The TAN section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluation.
9	03/96	7.1.6-1 – Annex 3	The ICPP section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluation.
10	04/96	7.1.2-1 to Annex 3	The PBF section and map have been revised to reflect the results of the 1996 comprehensive site compliance evaluation. The following pages were changed: 1, 7, 8, 16, 18, 20, 28, 30, 32, 33, 38, 39. The 1996 evaluation report was added to Annex 3.

Rev.	Date	Affected Pages	Revision Description
11	05/96	7.1.4-1 to Annex 3	The TAN section and map have been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
12	05/96	7.1.7-1 to Annex 3	The SMC section and map have been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
13	05/96	7.1.1-1 to Annex 3	The CFA section and map have been revised to reflect the results of the 1994 and 1995 comprehensive site compliance evaluation. Revised table of contents.
14	8/96	7.1.3-1 to Annex 3	The RWMC section and map have been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
15	8/96	7.3.-1 to 7.3.-51	The NRF section has been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
16	9/96	7.2.1-1 to Annex 3	The ANL-W section and map have been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
17	9/96	7.1.6-1 to Annex 3	The ICPP section and maps have been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
18	10/96	7.1.3-1 and 7.1.3-67	RWMC Worksheet #8 has been revised to postpone paving until the 1997 construction season.
19	3/97	7.1.6-1, 40, 41	ICPP Worksheet #7 has been revised to allow additional time for clean-up of oil contaminated soil.
20	4/97	7.1.3-1 to Annex 3	The RWMC section and map have been revised to reflect the results of the 1997 comprehensive site compliance evaluation.
21	6/97	7.1.1-1 to Annex 3	The CFA section and maps have been revised to reflect the results of the 1996 comprehensive site compliance evaluation.
22	6/97	7.1.2-1 to Annex 3	The PBF section and map have been revised to reflect the results of the 1997 comprehensive site compliance evaluation.

Rev.	Date	Affected Pages	Revision Description
23	6/97	7.1.7-1 to Annex 3	The SMC section and map have been revised to reflect the results of the 1997 Comprehensive Site Compliance evaluation.
24	6/97	7.1.4-1 to Annex 3	The TAN section and map have been revised to reflect the results of the 1997 comprehensive site compliance evaluation.
25	10/97	7.3-1 to Annex 3	The NRF section has been revised to reflect the results of the 1997 comprehensive site compliance evaluation.
26	4/98	7.1.1-1 to Annex 3	The CFA section has been revised to reflect the results of the 1997 comprehensive site compliance evaluation.
27	5/98	7.1.5-1 to Annex 3	The TRA section has been revised to reflect the results of the 1996 and 1997 comprehensive site compliance evaluation.
28	5/98	7.1.6-1 to Annex 3	The ICPP section has been revised to reflect the results of the 1997 comprehensive site compliance evaluation.
29	5/98	7.2.1-1 to Annex 3	The ANL-W section has been revised to reflect the results of the 1997 comprehensive site compliance evaluation
30	12/98	All	The Plan has been revised to modify the geographical area of permit applicability and to accommodate a transfer to the Multi-Sector General Permit.
31	5/99	Addendum II	Addendum II, Idaho Nuclear Technology and Engineering Center, was revised (except Table 4-4) to reflect the results of the 1999 comprehensive site compliance evaluation.
32	6/99	Addendum IV	Addendum IV, Radioactive Waste Management Complex, was revised (except Table 4-4) to reflect the results of the 1999 comprehensive site compliance evaluation.
33	6/99	Addendum V	Addendum V, Specific Manufacturing Capability Project, was revised to reflect the results of the 1999 comprehensive site compliance evaluation.
34	9/99	Addendum III	Addendum III, Landfills I, III, and III Extension, was revised to reflect the results of the 1999 comprehensive site compliance evaluation.
35	11/99	Addendum I and Section 6	Addendum I, Borrow Sources, was revised to reflect the results of the 1999 comprehensive site compliance evaluation. Section 6, References was revised.

Rev.	Date	Affected Pages	Revision Description
36	12/00	Addendum III	Addendum III, Landfills, I, III, and III Extension, was revised to reflect the results of the 2000 comprehensive site compliance evaluation.
37	12/00	Addendum IV	Addendum IV, Radioactive Waste Management Complex, was revised to reflect the results of the 2000 comprehensive site compliance evaluation.
38	12/00	Addendum I	Addendum I, Borrow Source, was revised to reflect the results of the 2000 comprehensive site compliance evaluation.
39	12/00	Addendum V	Addendum V, Specific Manufacturing Capability Project, was revised to reflect the results of the 2000 comprehensive site compliance evaluation.
40	12/00	Addendum II	Addendum II, Idaho Nuclear Technology and Engineering Center, was revised to reflect the results of the 2000 comprehensive site compliance evaluation.
41	01/01	All except Addenda	The INEEL Storm Water Pollution Prevention Plan for Industrial Activities was revised to implement the 2000 Multi-Sector General Permit.

Certification Statement
INEEL Storm Water Pollution Prevention Plan for Industrial Activities

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____ Date: 1/22/01

T. L. Perkins, Environmental Technical Support Division Director, DOE-ID
(Reference: Transfer Signature Authority Letter—OPE-EP&SA-98-01)

Certification Statement
INEEL Storm Water Pollution Prevention Plan for Industrial Activities

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: R S Watkins Date: 01/15/01

R. S. Watkins, General Manager, Environment, Safety, Health, and Quality Assurance, BBWI (Reference: Transfer Signature Authority Letter—PHD-34-00)

Approval Form
INEEL Storm Water Pollution Prevention Plan for Industrial Activities

The undersigned agree that the information in this document is true, accurate, and complete to the best of their knowledge.

Author: _____ Date: _____
E. D. Walker, Industrial Storm Water Coordinator, BBWI

Technical Reviewer: _____ Date: _____
D. R. Braun, Construction Storm Water Coordinator, BBWI

Approval: _____ Date: _____
J. F. Graham, Manager, Air/Water/NEPA Policy and Permitting, BBWI

Approval: _____ Date: _____
R. H. Guymon, Director, Environmental Affairs, BBWI

Approval: _____ Date: _____
A. Clark, INTEC Site Area Director, BBWI

Approval: _____ Date: _____
D. M. Bright, RWMC Site Area Director, BBWI

Approval: _____ Date: _____
D. L. Kudsin, SMC Site Area Director, BBWI

Approval: _____ Date: _____
V. R. Catania, CFA Site Area Director, BBWI

Approval: _____ Date: _____
M. C. Tiernan, PBF/WROC Site Area Director, BBWI

Original signatures are on file in Storm Water Program files

EXECUTIVE SUMMARY

This *INEEL Storm Water Pollution Prevention Plan for Industrial Activities* is designed to comply with the *Storm Water Multi-Sector General Permit for Industrial Activities* (EPA 2000), and it is intended to improve water quality by reducing pollutants in storm water discharges. The permit is issued by the U.S. Environmental Protection Agency through the National Pollutant Discharge Elimination System. The permittees are the U.S. Department of Energy Idaho Operations Office and Bechtel BWXT Idaho, LLC.

This plan applies to industrial activities with a potential to discharge storm water to the Big Lost River System. An addendum is included for the following:

- Borrow Sources (nonmetallic mineral mining) (Addendum I)
- Idaho Nuclear Technology and Engineering Center (Addendum II)
- Landfills I, III, and III Extension (Addendum III)
- Radioactive Waste Management Complex (Addendum IV)
- Specific Manufacturing Capability Project (Addendum V).

This plan contains requirements for pollution prevention practices to minimize pollutants in storm water. General pollution prevention practices include the following:

- Good housekeeping
- Preventive maintenance
- Spill prevention and response
- Erosion and sediment control
- Nonstorm water discharge management
- Storm water management
- Training
- Inspection
- Compliance evaluation
- Recordkeeping.

Other requirements include monitoring of storm water discharges and compliance with Idaho water quality standards, the *Endangered Species Act*, and the *National Historic Preservation Act*.

This plan describes how transportation activities are managed to control pollution of storm water. It also describes how responsibility for compliance is assigned for storm water pollution prevention.

CONTENTS

FIGURES

TABLES

ACRONYMS

BBWI	Bechtel BWXT Idaho, LLC
CFA	Central Facilities Area
DOE-ID	U.S. Department of Energy Idaho Operations Office
EPA	Environmental Protection Agency
ES&H	Environment, Safety, and Health
ESH&QA	Environment, Safety, Health and Quality Assurance
FAC	facility area of concern
INEEL	Idaho National Engineering and Environmental Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
MCP	Management Control Procedure
NEPA	National Environmental Policy Act
NOI	notice of intent
NPDES	National Pollutant Discharge Elimination System
RWMC	Radioactive Waste Management Complex
SDA	Subsurface Disposal Area
SMC	Specific Manufacturing Capability
SWPPP-CA	Storm Water Pollution Prevention Plan for Construction Activities
SWPPP-IA	Storm Water Pollution Prevention Plan for Industrial Activities
TAN	Test Area North
TSA	Transuranic Storage Area
WROC	Waste Reduction Operation Complex

INEEL STORM WATER POLLUTION PREVENTION PLAN FOR INDUSTRIAL ACTIVITIES

1. INTRODUCTION

The Idaho National Engineering and Environmental Laboratory (INEEL) must comply with the National Pollutant Discharge Elimination System (NPDES) (40 CFR 122, "EPA Administered Permit Programs: The National Pollutant Discharge Elimination System") *Storm Water Multi-Sector General Permit for Industrial Activities* (EPA 2000) (General Permit) reissued by the U.S. Environmental Protection Agency (EPA). The General Permit requires a storm water pollution prevention plan for industrial activities (SWPPP-IA) to be revised by the date a new notice of intent (NOI) is submitted. The NOI request for coverage under the October 30, 2000, General Permit is due January 29, 2001. This SWPPP-IA addresses *storm water discharge associated with industrial activities* (see definition) to *waters of the United States* (see definition). It discusses requirements, *pollution prevention practices* (see definition), evaluations, monitoring, training, records, potential pollution sources, and responsibilities. (See Section 7 "Definitions," for italicized terms.) This SWPPP-IA must be implemented within 2 days after submittal of the NOI.

The U.S. Department of Energy Idaho Operations Office (DOE-ID) and Bechtel BWXT Idaho, LLC (BBWI) are copermittees of the General Permit. The DOE-ID and BBWI share operational control of industrial activities. The DOE-ID is responsible for funding activities to ensure compliance with permit conditions. The DOE-ID is also responsible for decisions concerning policy, programmatic direction, and prioritization. In its role as the management and operating contractor to DOE-ID, BBWI has operational control of activities to ensure compliance with permit conditions. Industrial activities may involve INEEL organizations, subcontractors, or other entities. However, BBWI is only responsible for the activities of its employees and subcontractors.

The notices of intent to comply with the General Permit submitted to the EPA by DOE-ID and BBWI in January 2001 (see Appendix A, Guymon 2001) are sufficient for industrial activities at the INEEL. For industrial activities off-Site, such as in Idaho Falls, another notice of intent may be required.

1.1 Purpose

The General Permit is based on national studies that indicated *storm water* (see definition) discharges are a significant source of *pollutants* (see definition) and cause water-use impairment in receiving streams. The EPA's goal of storm water management is to improve water quality by reducing pollutants in storm water discharges. The General Permit does not authorize storm water discharges from industrial activities that cause, or have reasonable potential to cause or contribute to, violations of water quality standards. The EPA determined the best approach to storm water management is through self-designed storm water pollution prevention plans based on the use of pollution prevention practices.

The pollution prevention plans are designed to prevent or minimize the pollution of storm water before receiving streams are affected. Storm water becomes polluted as it flows over surfaces where industrial activity is taking place and picks up soil particles and other pollutants. For industrial activities, practices can be implemented to reduce the risk of spills and leaks during material handling activities, prevent materials stored outdoors from contacting storm water, and prevent potentially contaminated storm water from leaving a facility.

1.2 Background

The DOE-ID submitted a notice of intent (Pitrolo 1992) to comply with the *General Permit for Storm Water Discharges Associated with Industrial Activity* (EPA 1992b). The EPA issued a coverage notice with permit number IDR00A194. The DOE-ID was the sole permittee. The DOE-ID submitted a notice of intent (Bennett 1997) to EPA to extend coverage.

On July 11, 1997, EPA proposed (EPA 1997) to terminate the *General Permit for Storm Water Discharges Associated with Industrial Activity* (EPA 1992b) upon modification of the *Storm Water Multi-Sector General Permit for Industrial Activities* (EPA 1995). As a result, the INEEL requested and received coverage under a modified permit in 1998, and is required to seek coverage under the permit reissued on October 30, 2000 (EPA 2000).

The 1992 permit contained a State of Idaho special condition stating that storm water be treated and disposed of in such a manner that the groundwater standards of Idaho were not violated. Consequently, this plan originally applied to the entire INEEL and was intended to ensure protection of deep injection wells. The 1998 modified permit and the 2000 reissued permit do not contain that special condition, and this plan is no longer applicable to the entire INEEL (see Section 2, "Scope," for applicable area). Groundwater protection is addressed by Management Control Procedure (MCP)-3480, "Environmental Instructions for Facilities, Processes, Materials and Equipment." The wells are regulated by permits issued by the Idaho Department of Water Resources and monitored according to BBWI Environmental Monitoring procedures.

1.3 Plan Organization

This SWPPP-IA is written in two parts. The first part contains information pertaining to the scope of the storm water pollution prevention program, requirements, potential pollution from transportation activities, and responsibilities. It identifies the substantive requirements of the reissued General Permit. The requirements are applicable to each specific facility or activity in the second part of this SWPPP-IA. Correspondence is presented in Appendix A.

The second part contains addenda for regulated activities. Other than editorial changes, no substantive changes to the addenda are necessary at this time because the reissued General Permit contained no substantive changes to the sector-specific requirements applicable to the INEEL. The addenda were revised in 2000 following the comprehensive site evaluations and will be revised again during the 2001 comprehensive site evaluations unless an event necessitates earlier revision. An addendum is included for the following facilities or activities:

- Borrow Sources (nonmetallic mineral mining) (Addendum I)
- Idaho Nuclear Technology and Engineering Center (INTEC) (Addendum II)
- Landfills I, III, and III Extension at the Central Facilities Area (CFA) (Addendum III)
- Radioactive Waste Management Complex (RWMC) (Addendum IV)
- Specific Manufacturing Capability (SMC) Project (Addendum V).

The addenda address storm water regulatory requirements applicable to a facility or activity. Specific facility areas of concern are addressed, including tank farms, loading docks, material storage yards, contaminated areas, landfills, and treatment units. Maps provide a detailed layout of the facility, including surface drainage flow patterns, facility areas of concern, and storm water monitoring and spill locations. Each addendum also contains the following:

- A roster of a storm water pollution prevention team
- Identification of pollution prevention practices
- Inventory of exposed or potentially exposed significant materials since January 1998
- Identification of significant past leaks and spills that have occurred outdoors since January 1998
- Identification of nonstorm water discharges
- Summary of existing storm water monitoring data
- Description of future storm water monitoring.

1.4 Penalties

Noncompliance with the conditions of the General Permit constitutes a violation of the *Clean Water Act* and is grounds for enforcement action, including permit termination, revocation and reissuance, modification, or denial of a permit renewal application. Substantial penalties may result from violations of permit conditions and could include the following categories:

- Criminal violations (negligent violations, knowing violations, knowing endangerment, and false statement)
- Civil penalties
- Administrative penalties
- Penalties for falsification of reports
- Penalties for falsification of monitoring systems.

Table 1-2 specifies the types of violations and associated penalties, as stated in the General Permit.

Table 1-2. Penalties for noncompliance with permit requirements.

General Permit Reference and Penalty Category	Penalty
Part VII.A.2.a.(1) Criminal/Negligent Violations	"The *Clean Water Act* provides that any person who negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than 1 year, or both."
Part VII.A.2.a.(2) Criminal/Knowing Violations	"The *Clean Water Act* provides that any person who knowingly violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a fine of not less than $5,000 nor more than $50,000 per day of violation, or by imprisonment for not more than 3 years, or both."
Part VII.A.2.a.(3) Criminal/Knowing Endangerment	"The *Clean Water Act* provides that any person who knowingly violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act and who knows at that time that he is placing another person in imminent danger of death or serious bodily injury is subject to a fine of not more than $250,000, or by imprisonment for not more than 15 years, or both."
Part VII.A.2.a.(4) Criminal/False Statement	"The *Clean Water Act* provides that any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under the Act or who knowingly falsifies, tampers with, or renders inaccurate, any monitoring device or method required to be maintained under the Act, shall upon conviction, be punished by a fine of not more than $10,000 or by imprisonment for not more than 2 years, or by both. If a conviction is for a violation committed after a first conviction of such person under this paragraph, punishment shall be by a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or by both. (See Section 309.c.4 of the *Clean Water Act*)."
Part VII.A.2.b. Civil Penalties	"The *Clean Water Act* provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a civil penalty not to exceed $27,500 per day for each violation."
Part VII.A.2.c. Administrative Penalties	"The *Clean Water Act* provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to an administrative penalty, as follows: *(1) Class I penalty* - Not to exceed $11,000 per violation nor shall the maximum amount exceed $27,500. *(2) Class 2 penalty* - Not to exceed $11,000 per day for each day during which the violation continues nor shall the maximum amount exceed $137,500."
Part VII.H. Penalties for Falsification of Reports	"Section 309(c)(4) of the *Clean Water Act* provides that any person who knowingly makes any false material statement, representation, or certification in any record or other document submitted or required to be maintained under this permit including reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or by both."
Part VII.I. Penalties for Falsification Monitoring Systems	The *Clean Water Act* provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by fines and imprisonment described in Section 309 of the Act.

Note: Sections listed are: 301, "Effluent Limitation," 302, "Water Quality Related Effluent Limitations," 306, "National Standards of Performance," 307, "Toxic and Pretreatment Effluent Standards," 308, "Inspections, Monitoring and Entry," 318, "Aquaculture," 405, "Disposal of Sewage Sludge," and 309(c)(4), "False Statements."

2. SCOPE

2.1 Hydrology

2.1.1 Surface Water

Prior to agricultural development, surface water frequently flowed to the area where the INEEL is located from three major streams: Big Lost River, Birch Creek, and Little Lost River. The surface water accumulated in playas and recharged groundwater.

The Big Lost River enters the INEEL annually, except during drought conditions. Figure 2-1 shows the annual discharge of the Big Lost River from 1965 to 1999 upstream of the INEEL diversion (Figure 2-2 shows the location of the diversion). Figure 2-1 also shows the capacity of some reservoirs to compare the reservoir capacity to the annual discharge of the Big Lost River. Water flowed continuously from May 1968 to May 1977 (9 years) and from March 1982 to April 1987 (5 years). Due to drought conditions, there was no flow from August 1987 through April 1995, except during June 1993. The Big Lost River flows northeast and terminates in sinks and playas as shown on Figure 2-2.

Birch Creek flowed into Playa 4 (see Figure 2-2) before it was diverted for irrigation and power production and before gravel pits were constructed. Now Birch Creek flows into the INEEL in channels constructed below the power plant and has not reached the playa in recent years.

The Little Lost River flows to a playa at the INEEL boundary. However, it has not reached the INEEL in recent years.

2.1.2 The Big Lost River System

Figure 2-2 shows the Big Lost River System, which is waters of the United States at the INEEL. Hinman (1993) (see Appendix A) summarizes discussions between EPA Region 10 and DOE-ID regarding which surface waters on the INEEL are waters of the United States as follows: the Big Lost River and tributaries with defined channels that directly connect to the Big Lost River are considered to be waters of the United States, as are the playas where the Big Lost River terminates. Isolated, intermittent streams without defined channels directly connected to the Big Lost River are not waters of the United States. In November 1993, the Army Corps of Engineers designated Spreading Areas A and B near the RWMC as waters of the United States.

Wetland and riparian areas can temporarily cover over 2,000 acres of the INEEL during periods of high water flow in the Big Lost River and significant snow melt events. The wetland and riparian areas include spreading areas, sinks, playas, depressions, and manmade ponds and excavations. The areas are shown on the map of the Big Lost River System (see Figure 2-2).

2.1.3 Storm Water Discharge

Generally, storm water may flow into the Big Lost River System on the INEEL when the ground is frozen and there is a rain or snow melt event. Typically, storm water infiltrates or flows to low-lying areas. Figure 2-3 shows an approximate area where storm water has a reasonable potential to discharge to the Big Lost River System. For the Big Lost River and its tributaries, spreading areas, and playas, the drainage area is based on Bennett (1990). For Birch Creek and its playa, the drainage area is based on

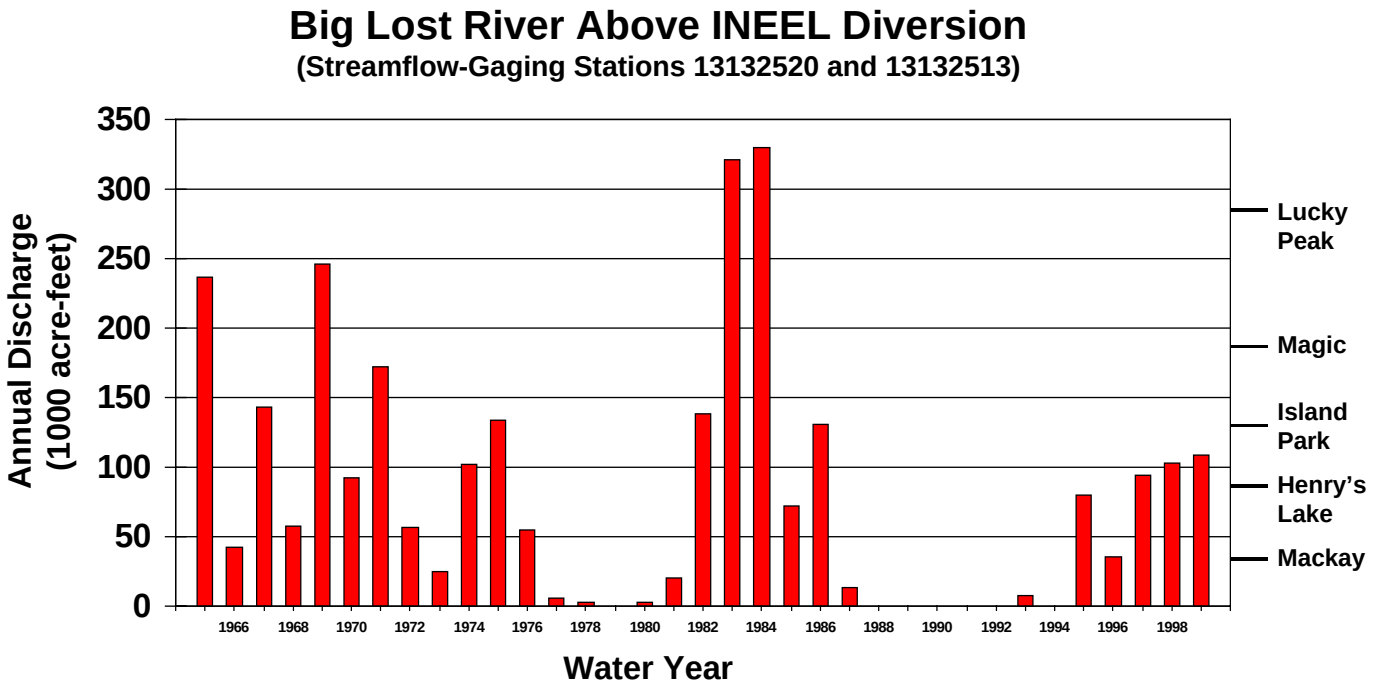


Figure 2-1. Big Lost River above INEEL diversion (Streamflow-Gaging Stations 13132520 and 13132513).

Click here to view Figure 2-2

Figure 2-2. The Big Lost River System.

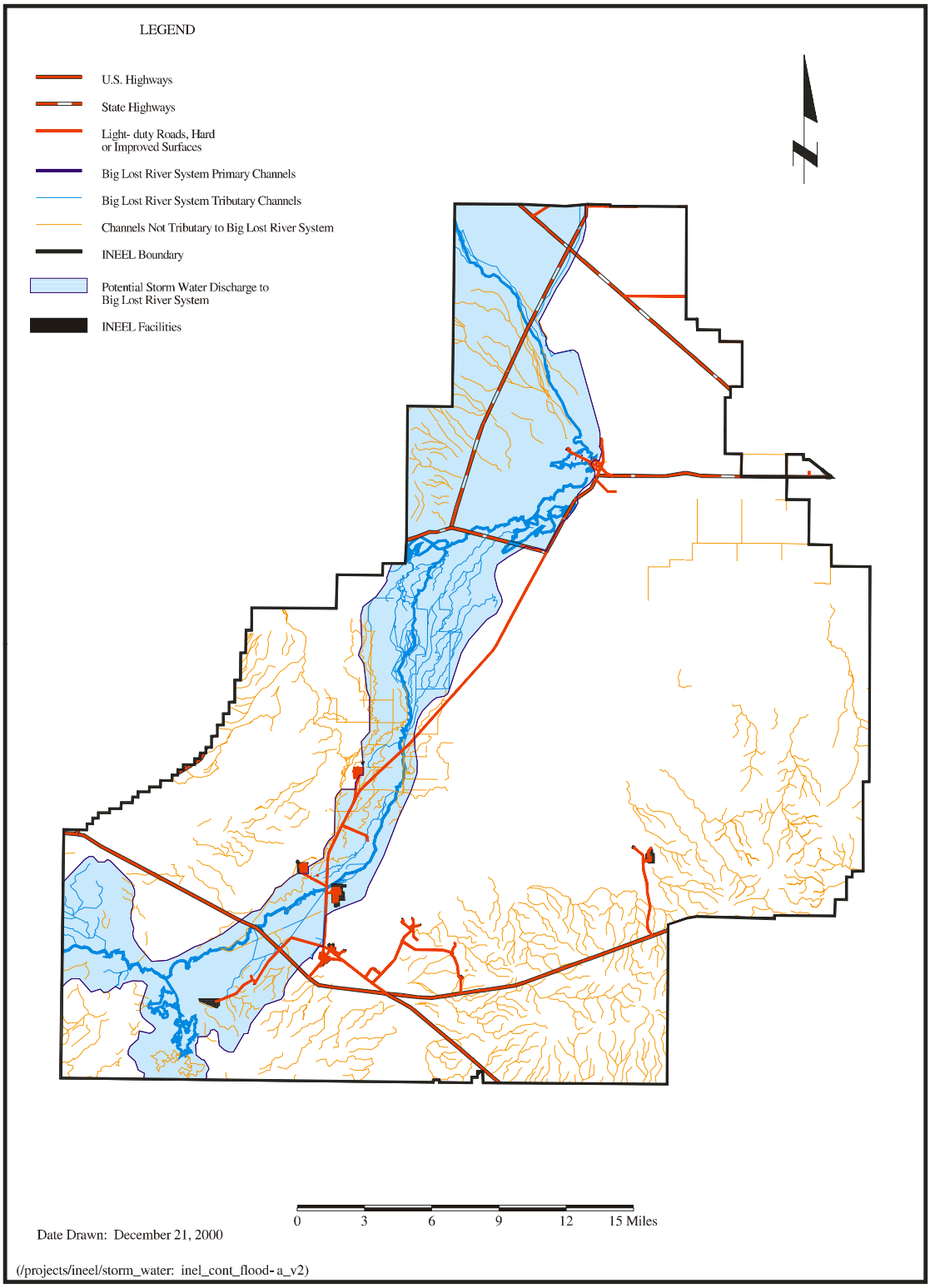


Figure 2-3. INEEL potential storm water discharge to Big Lost River System.

Brenenbrock and Kjelstrom (1997). The requirements of the General Permit are applied to activities within the area of potential storm water discharge to the Big Lost River System shown in Figure 2-3. A more detailed map of the area is in Appendix B. The area borders the perimeters of the Test Reactor Area and the Naval Reactors Facility. However, the drainage within those facilities is engineered to flow away from the Big Lost River.

2.2 Industrial Activity

The Storm Water Program will manage activities, that fall within the regulatory definition of *storm water discharge associated with industrial activity* (see definition). The term includes "the discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant" (40 CFR 122). The regulatory definition adds eleven categories of industries that are considered to be engaging in "industrial activity" for purposes of storm water regulation. The categories are defined by standard industrial classification codes or activity codes. The INEEL's primary code is 8733 (Research, Development, and Testing Services), and it is not included in the categories. So, the INEEL's primary code does not make the General Permit applicable to the INEEL. However, the INEEL does perform some of the activities with activity codes, and some of those activities have a potential to discharge storm water to the Big Lost River System. Therefore, the INEEL must comply with the General Permit. The INEEL activity codes are Landfill and Hazardous Waste Operations. Since the General Permit is applicable to the INEEL, the INEEL's secondary code 3795 (Manufacturing Tanks and Tank Components) is regulated by the General Permit because the code is included in the categories, and the activity has a potential to discharge storm water to the Big Lost River System. Other regulated activities are code 1442, Construction Sand and Gravel Mining, and code 1459, Clay Mining.

Specifically, the following activities are performed at the INEEL, have a potential to discharge storm water to the Big Lost River System, and are regulated by the General Permit:

- Transportation equipment manufacturing at SMC
- Hazardous waste treatment, storage, or disposal at INTEC and RWMC
- Landfills at RWMC; the ash pit at INTEC; and Landfills I, III, and III Extension at CFA
- Nonmetallic mineral mining at several borrow sources.

For those industries that are regulated as a result of being included in any of the eleven categories, the regulations describe various types of discharges that are regulated. They include, but are not limited to, "storm water discharges from industrial plant yards; immediate access roads and railroads used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined in 40 CFR 401); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and finished products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water" (40 CFR 122). The list is illustrative and not all-inclusive, so similar discharges are included also. This SWPP-IA refers to the areas with regulated discharges as "facility areas of concern."

2.2.1 Colocated Industrial Activity

Colocated industrial activities are determined on an outfall-by-outfall basis. If two industrial activities discharge to the same outfall, then they are colocated. For example, within the Operations Area at the RWMC, equipment is stored for use at a hazardous waste treatment, storage, or disposal facility (Sector K) and a landfill (Sector L). Facilities with colocated industrial activities shall comply with all applicable monitoring and pollution prevention plan requirements of each sector in which a colocated industrial activity is described.

2.2.2 Commingled Storm Water

The definition of storm water discharge associated with industrial activity excludes "areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas" (40 CFR 122). So, if storm water from an activity does not commingle with storm water from an industrial activity listed above, then that activity is not a facility area of concern. Conversely, if storm water from an activity commingles with storm water from an industrial activity listed above, then that activity is a facility area of concern.

2.2.3 Special Activities

The General Permit identifies special requirements for pollution prevention plans for *water priority chemicals* (see definition) above the threshold quantity for monitoring storm water from coal piles and for managing piles of sand and salt mixtures. So, those activities are also included in the scope of this SWPPP-IA if there is a potential for storm water to discharge to the Big Lost River System. Operations at INTEC involve more than the threshold quantity of nitric acid, coal at the steam plant, and storing a mixture of sand and salt. These activities are located in the corridor of the Big Lost River System and are within the scope of this SWPPP-IA.

The steam plant at INTEC has been shutdown, and the associated coal pile has been removed. However, coal residue remains and has the potential to pollute storm water. Therefore, coal pile monitoring and pollution prevention requirements apply until the coal residue is removed or stabilized.

2.2.4 Soil Disturbing Activities

Examples of industrial activities that involve soil disturbance by BBWI employees are given in the following list:

- Underground leaking pipe repair
- Geotechnical investigation with minimal disturbance
- Archaeological investigation with minimal disturbance
- Contaminated soil investigation with minimal disturbance
- Landfill operation
- Borrow source operation (for example, gravel pit).

2.3 Relationship to Construction Activities

Construction activities are addressed in the *INEEL Storm Water Pollution Prevention Plan for Construction Activities* (SWPPP-CA, DOE/ID-10425). Subcontractors usually perform construction activities. Therefore, BBWI employees typically do not disturb soil during construction activities. Demolition activities and road maintenance are considered construction activities even when performed by BBWI employees and must meet the requirements of the SWPPP-CA. Figure 2-4 is a decision tree to determine when the SWPPP-IA or SWPPP-CA applies. Project-specific storm water pollution prevention practices are implemented for each construction activity. When construction activities within an industrial area covered by the General Permit are completed, the completed construction project is evaluated to determine potential impact to storm water discharges from industrial activities. If there is a potential source of pollution from the completed construction project, the project will be addressed in the next SWPPP-IA addendum revision following the comprehensive evaluation.

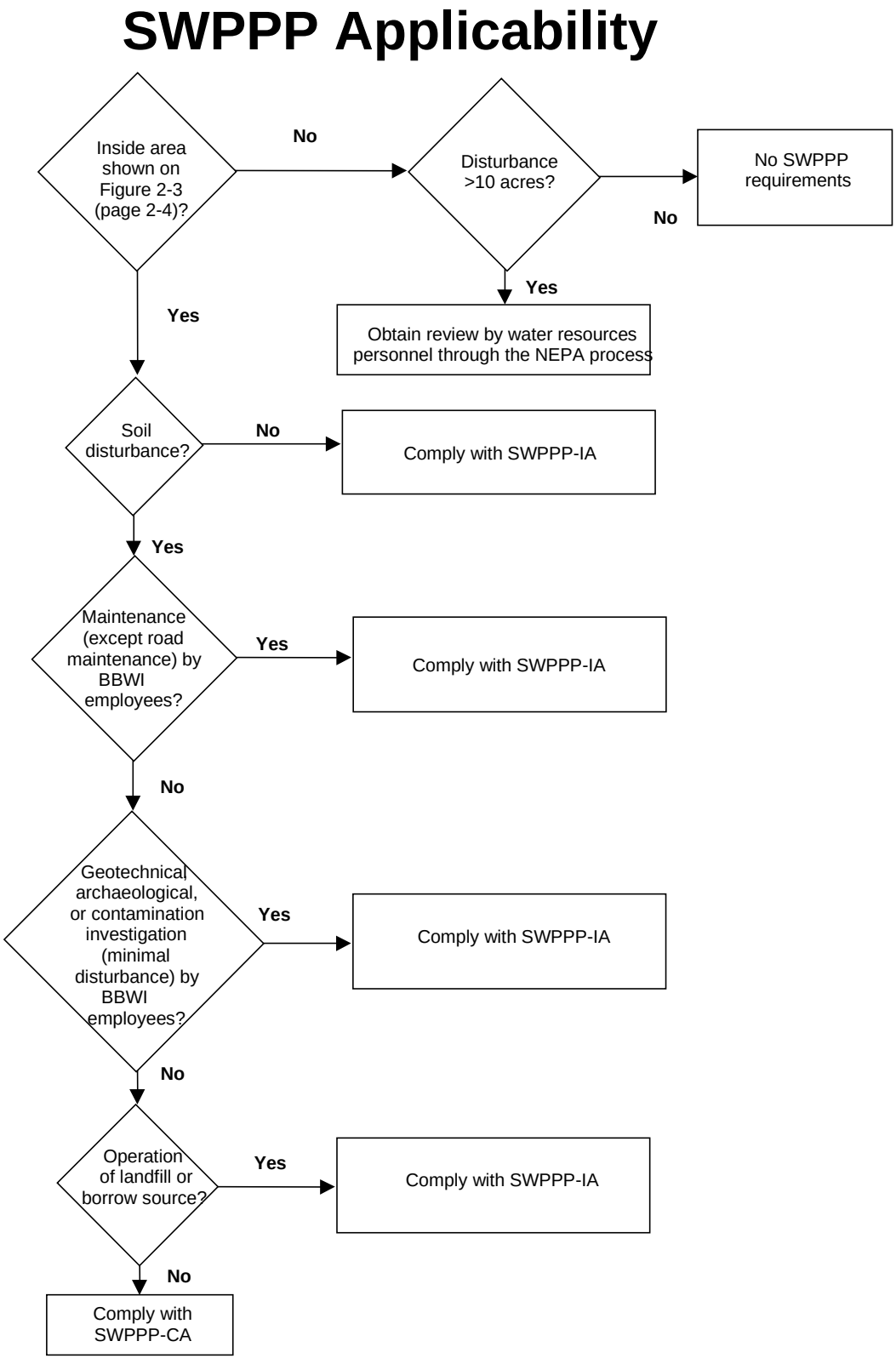


Figure 2-4. Decision tree to determine if a storm water pollution prevention plan applies.

3. REQUIREMENTS

The requirements presented in this section apply to all industrial activities within the scope of this plan. Other requirements are presented in the addenda.

3.1 Pollution Prevention Plan

This SWPPP-IA is prepared in accordance with good engineering practices as required by 40 CFR 125.3(d)(2) or (3). The EPA's guidance manual (EPA 1992a) was used extensively for the preparation of this SWPPP-IA. This SWPPP-IA identifies *significant materials* (see definition) that reasonably may be expected to affect the quality of storm water discharges as required. In addition, this SWPPP-IA describes and ensures the implementation of practices that will be used to reduce the pollutants in storm water discharges and ensure compliance with the terms and conditions of the General Permit as required.

Facilities must implement the provisions of the SWPPP-IA (BBWI, MCP-3480) as a condition of the General Permit. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to comply with the conditions of the General Permit. All reasonable steps shall be taken to minimize or prevent any discharge in violation of the General Permit that has a reasonable likelihood of adversely affecting human health or the environment. All facilities and systems of treatment and control used to achieve compliance with the General Permit shall be properly operated and maintained at all times.

3.1.1 Idaho Water Quality Requirements

The SWPPP-IA design and associated storm water discharge quality shall demonstrate that discharges will not cause water quality violations, will not cause degradation of the receiving water, and will be in compliance with applicable Idaho water quality standards as required by the General Permit. The Idaho water quality standards are published in the *Water Quality Standards and Wastewater Treatment Requirements* (Idaho Department of Environmental Quality Rules and Regulations). The Big Lost River, Birch Creek, and Little Lost River are protected from their sources to the playas (Idaho Department of Environmental Quality 01.02.150). The general water quality criteria address the following topics:

- Hazardous materials
- Toxic substances
- Deleterious materials
- Radioactive materials
- Floating, suspended, or submerged matter
- Excess nutrients
- Oxygen demanding materials
- Sediment (IDEQ 01.02.200).

As of November 2000, the classifications of the waters were those shown in Table 3-1. The water quality criteria for each classification are stated in Section 250 of the *Water Quality Standards and Wastewater Treatment Requirements* (Idaho Department of Environmental Quality). The State of Idaho lists no specific Clean Water Act 401 certification requirements for the General Permit. Therefore, no additional requirements other than those specified in the Idaho *Water Quality Standards and Wastewater Treatment Requirements* are applicable.

There are specific requirements in the permit for discharges to *water quality-impaired* (see definition) or *water quality-limited* (see definition) receiving waters. Based on review of the list of the EPA listing, there are no water quality-impaired sections of the Big Lost River, Birch Creek, or Little Lost River that are receiving waters from INEEL storm water discharges. Furthermore, *total maximum daily loads* (see definition) have not been established for the entire reach of these streams. Therefore, requirements for discharges to water quality-impaired listed receiving waters are not applicable to INEEL storm water discharges.

The INEEL will demonstrate compliance in accordance with EPA's interim approach for water quality-based effluent limitations in storm water permits (EPA 1996). The interim approach uses pollution prevention practices to attain water quality standards. The INEEL will use pollution prevention practices, inspections, evaluations, monitoring, and corrective measures as required by the General Permit to ensure that SWPPP-IA design and associated storm water discharge quality demonstrate compliance with Idaho water quality standards.

Table 3-1. Classifications for surface water.[a]

Waters	Domestic Water Supply	Agricultural Water Supply	Cold Water Biota	Warm Water Biota	Salmonid Spawning	Primary Contact Recreation	Secondary Contact Recreation	Special Resource Water	Total Maximum Daily Load Listed
Big Lost River	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No
Birch Creek	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No
Little Lost River	No	Yes	Yes	No	Yes	Yes	Yes	No	No

a. Idaho Department of Environmental Quality 01.02.150.

3.1.2 Endangered Species Requirements

This SWPPP-IA shall be designed to protect species and habitat. The *Endangered Species Act* establishes a program for the identification and conservation of listed endangered and threatened species and designated critical habitat. The Act requires federal agencies to take into account the effects of their actions on the species and habitat. The General Permit requires that storm water discharges, allowable nonstorm water discharges, and *discharge-related activities* (see definition) avoid unacceptable effects on the species and habitat.

As of November 2000, there were no known resident listed species at the INEEL. The bald eagle is a listed species that visits the INEEL, but does not reside at the INEEL. An evaluation was conducted, and existing discharges and activities are determined not to have an unacceptable effect on the bald eagle (Blew 2001).

For new discharges and activities, the INEEL satisfies the requirements of the *Endangered Species Act* by performing comprehensive field and written ecological evaluations and implementing recommendations to prevent or mitigate unacceptable effects on the species and habitat. The evaluations are included in a file of the activity's documents related to the *National Environmental Policy Act* (BBWI, MCP-3480).

3.1.3 National Historic Preservation Requirements

This SWPPP-IA shall be designed to protect historic properties and resources. The *National Historic Preservation Act* establishes a national historic preservation program for the identification and protection of historic properties and resources. Federal agencies are required to take into account the effects of their actions on historic properties that are listed or eligible for listing on the National Register of Historic Places. The General Permit requires that storm water discharges, allowable nonstorm water discharges, and discharge-related activities do not affect a property that is listed or is eligible for listing in the National Historic Register, or that the discharge be in compliance with a written agreement with the state historic preservation officer, who outlines all measures to be undertaken to mitigate or prevent adverse effects to the historic property.

For existing discharges and activities, the INEEL satisfied the requirements of the *National Historic Preservation Act* by performing field surveys and requesting concurrence of a "no effect" determination from the Idaho State historic preservation officer (Pace 2001a) and Shoshone-Bannock Tribes (Pace 2001b).

For new discharges and activities, the INEEL satisfies the requirements of the *National Historic Preservation Act* by performing comprehensive field and written historic evaluations of activities that disturb ground outside of facility fences and within 50 feet of structures and activities that demolish or modify structures. The evaluations determine if an activity has the potential to affect properties listed or eligible for listing on the National Register of Historic Places, if consultation with the state historic preservation officer is needed, and if preventive or mitigative measures are required to protect historic properties. The evaluations are included in a file of the activity's documents related to the *National Historic Preservation Act*. Activities must implement any recommendations to prevent or mitigate adverse impacts to historic properties. If archaeological materials are discovered during ground–disturbing activities, then additional historic evaluations are conducted.

3.1.4 Modification Requirements

The SWPPP-IA shall be modified within 30 days of notification from the EPA regional administrator that the plan does not meet the minimum requirements. Certification that the requested modification has been made must be submitted to the EPA regional administrator.

The SWPPP-IA shall be modified if any of the following occurs:

- If there is a change in design, construction, operation, or maintenance that has a significant effect on the potential for the discharge of pollutants
- If the SWPPP-IA proves ineffective in eliminating or significantly minimizing pollutants
- If the SWPPP-IA is ineffective in otherwise achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity.

Also, the SWPPP-IA must be modified within 14 calendar days of a discharge of a hazardous substance or oil in an amount equal to or greater than a reportable quantity to the Big Lost River System. The modification must provide the date, circumstances, and a description of the discharge. If appropriate, the SWPPP-IA must be modified to identify measures to prevent the recurrence of such releases and to respond to such releases.

If it is determined that a facility no longer has a potential to add pollutants to storm water, a "no exposure" certification will be prepared, and the SWPPP-IA modified accordingly.

3.1.5 Availability Requirements

A copy of this SWPPP-IA shall be made available upon request to the assistant administrator for fisheries of the National Oceanic and Atmospheric Administration, the U.S. Fisheries and Wildlife Service regional director, or authorized representatives of those officials. A copy of this SWPPP-IA shall be provided to the Idaho Department of Environmental Quality within 72 hours when so requested. Any information to determine compliance with the General Permit and copies of any records required by the General Permit shall be furnished to the EPA Region 10 administrator upon request. This SWPPP-IA is available at the INEEL Technical Library and is available on the internet via the INEEL homepage (www.inel.gov).

3.2 General Pollution Prevention Practices

The General Permit requires the use of pollution prevention practices to prevent or minimize pollution of storm water. The following are general pollution prevention practices:

- Good housekeeping
- Preventive maintenance
- Spill prevention and response
- Erosion and sediment controls
- Nonstorm water discharge management
- Storm water management
- Training
- Inspection
- Compliance evaluation
- Recordkeeping.

3.2.1 Good Housekeeping

Good housekeeping includes the following tasks:

- Outside areas are kept in a neat and orderly condition
- Materials stored outdoors are appropriately contained and labeled
- Adequate work space is provided
- Waste is routinely removed
- Snow and ice are promptly removed from walking surfaces, roads, and parking areas
- Outdoor storage of equipment, materials, and waste is confined to designated areas
- Measures are instituted to minimize the potential for solid materials, including floatable debris, to be discharged to the storm water system or receiving waters
- Measures are instituted to minimize off-site vehicle tracking and generation of dust from raw, final, waste materials or sediments.

3.2.2 Preventive Maintenance

Preventive maintenance includes the following tasks:

- Timely inspection and maintenance of storm water management devices, such as culverts, ditches, collection basins, oil and grit collection devices, inlets, pipes, and lift stations
- Inspection and testing of facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants
- Proper maintenance of facility equipment and systems.

3.2.3 Spill Prevention and Response

Spills of hazardous substances or oil to storm water discharges shall be prevented or minimized by implementing the following measures and practices as appropriate:

- Use secondary containment, leak detection devices, and overflow controls
- Use procedures for transferring materials that minimize spills
- Apply chemicals such as pesticides and fertilizers appropriately
- Implement good housekeeping practices
- Perform inspections to identify conditions that could lead to spills
- Perform preventive maintenance of vehicles and equipment that could produce spills.

All spills must be reported to the BBWI spill notification team, pager 6400 (BBWI, MCP–3480). Spill response is according to the *INEEL Emergency Plan/RCRA Contingency Plan* (BBWI, Manual 16A). Petroleum spills of less than 25 gallons to soil are reported if not cleaned up within 24 hours according to the *Water Quality Standards and Wastewater Treatment Requirements* (Idaho Department of Environmental Quality Rules and Regulations).

The SWPPP-IA must list significant spills that occurred since January 1998. Significant spills include the following:

- Petroleum products of 12.5 gallons or more
- Extremely hazardous substances (40 CFR 355, "Emergency Planning and Notification")
- Hazardous substances (40 CFR 117, "Determination of Reportable Quantities for Hazardous Substances" and 40 CFR 302, "Designation, Reportable Quantities, and Notification") of half the reportable quantity or more
- Chronic releases, not necessarily petroleum products or hazardous substances.

When spills to the Big Lost River System contain a hazardous substance or oil in an amount equal to or in excess of a reporting quantity established under 40 CFR 110, "Discharge of Oil," 40 CFR 117, or 40 CFR 302 during a 24-hour period, the following actions must be taken:

- Notify the National Response Center, 800-424-8802, in accordance with the requirements of 40 CFR 117 and 302.
- Modify the SWPPP-IA within 14 calendar days of a discharge to the Big Lost River System of a hazardous substance or oil in an amount equal to or greater than a reportable quantity. The modification must provide the date, circumstances, and a description of the discharge. If appropriate, the SWPPP-IA must be modified to identify measures to prevent the recurrence of such releases and to respond to such releases.
- Notify the EPA Region 10 in writing within 14 days of the incident. The notification must include a description of the release, including the type and amount of the material released, the date the release occurred, circumstances leading to the release, and steps to be taken to modify the SWPPP-IA.

3.2.4 Erosion Controls, Sediment Controls, Soil Stabilization, Offsite Tracking, and Dust Control

Structural, vegetative, or procedural measures are used to stabilize soil, control erosion, minimize offsite tracking, and minimize dust-production and transport. Structural measures include the following:

- Pavement
- Gravel with weed control
- Riprap.

Vegetative measures include the following:

- Sod
- Native vegetation for permanent cover
- Select species for temporary vegetative cover.

Vegetation other than sod is established according to the *Guidelines for Revegetation of Disturbed Sites at the Idaho National Engineering Laboratory* (DOE/ID-12114). Weeds are not an acceptable soil stabilization measure. Noxious weeds must be controlled according to the *Noxious Weed Act* and the Idaho *Noxious Weed Rules* (Idaho Department of Agriculture 02.06.22).

Procedural measures include the following:

- Minimize vehicle traffic on unstablized areas
- Minimize vehicle traffic during wet periods that may result in offsite tracking of sediment
- Minimize dust production and transport by applying water as needed.

If erosion occurs, then sediment is controlled by measures that include the following:

- Check dam
- Silt fence
- Sediment trap
- Vegetated buffer zones
- Settling basin
- Velocity dissipation devices.

3.2.5 Nonstorm Water Discharge Management

3.2.5.1 Authorized Nonstorm Water Discharges. Except as listed below, discharges of material other than storm water must be in compliance with another NPDES permit issued for the discharge. The following nonstorm water discharges, except fire fighting activities, may be authorized by the General Permit provided the nonstorm water component of the discharge is identified in the addenda and appropriate pollution prevention practices are identified and implemented for the nonstorm water component of the discharge:

- Fire fighting activities
- Fire hydrant flushings
- Potable water sources, including water line flushings

- Drinking fountain water
- Uncontaminated compressor condensate
- Irrigation drainage
- Lawn watering
- Routine external building washdown that does not use detergents or other compounds
- Pavement washwaters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used
- Air conditioning condensate
- Uncontaminated springs
- Uncontaminated groundwater
- Foundation or footing drains where flows are not contaminated with process materials such as solvents
- Cooling tower mist.

3.2.5.1.1 Liquid Effluent Inventory—All liquid effluent discharges that may impact the environment are identified at the INEEL. Information about the discharges is maintained in the Liquid Effluent Inventory (BBWI, INEEL/EXT-00-00968) database. The database provides an accurate list of all liquid effluent sources and discharge points and identifies which discharges are subject to DOE orders or federal, state, or local permitting or reporting requirements. Also, the database provides specific location descriptions that relate to buildings shown on the facility maps in the addenda. Identification tags are posted at most discharge points. An annual review of the database and field verification is performed to satisfy the requirement for an annual compliance evaluation as specified in the General Permit.

3.2.5.1.2 Nonstorm Water Certification—The General Permit requires a certification that the storm water discharge has been tested or evaluated for the presence of nonstorm water discharges. The certification shall include the identification of potential significant sources of nonstorm water, a description of the results of the test or evaluation, the evaluation criteria for the testing method, the date of the test or evaluation, and the drainage points that were observed. The Liquid Effluent Inventory is the basis for the certification. If a facility is unable to provide the certification, then the EPA Region 10 administrator must be notified.

3.2.5.2 Other Nonstorm Water Discharges. Other nonstorm water discharges are approved even though they are not on the list of authorized discharges in the General Permit. Such nonstorm water discharges are approved on a case-by-case basis by the industrial storm water coordinator and DOE-ID point of contact. The addenda list specific discharges.

3.2.6 Storm Water Management

Storm water is managed to achieve the following:

- Minimize contact with potential pollutant sources, such as material storage areas, tank farms, and contaminated soils
- Dispose of storm water through evaporation and infiltration by directing it to collection basins, vegetated swales, and channels
- Minimize pollutants discharged in storm water
- Prevent flooding of structures, such as buildings and roads.

Pollution prevention practices, other than those to control sources of pollutants, are included in storm water management. The practices include inlet protection devices, such as grit collection chambers, grit filters, and oil absorbent materials.

Collected storm water may be used for dust suppression or irrigation.

3.2.7 Training

This section presents information on training for storm water pollution prevention. The INEEL Storm Water Program is responsible for providing storm water training. Training organizations are responsible for coordinating storm water training. Managers and supervisors are responsible for identifying the personnel that must complete the training.

The training emphasizes pollution prevention practices required by the General Permit. Training is administered annually via a self-study workbook. The workbook is accessible from the BBWI internal home page on the intranet. The workbook provides regulatory requirements, scenarios of general tasks that could pollute storm water, and instructions tailored to specific industrial activities. The workbook consists of several sections, and employees complete a general section and specific sections that are applicable to the industrial activities they support. The specific sections address the industrial activities listed below (see Section 2, “Scope”):

- Transportation equipment manufacturing at SMC
- Hazardous waste operations at INTEC and RWMC
- Landfill operations at selected CFA landfills, RWMC, and INTEC
- Nonmetallic mineral mining within the Big Lost River Corridor.

Annual training is required for all personnel who work at SMC, INTEC, RWMC, selected CFA landfills, and selected borrow sources (see Section 2, “Scope”) and employees that are responsible for implementing activities identified in this SWPPP-IA. This includes subcontractors, consultants, and other temporary workers if their assigned duties have the potential to pollute storm water. For short-term assignments, however, those workers may be overseen by a trained individual at the job site.

3.2.8 Inspection

Qualified facility personnel conduct periodic inspections to achieve the following:

- Verify that pollution prevention practices are implemented
- Evaluate the effectiveness of pollution prevention practices
- Identify conditions that may contaminate storm water and identify where additional pollution prevention practices are needed
- Correct deficiencies on an ongoing basis to minimize the potential of identifying deficiencies during the annual comprehensive site compliance evaluations.

Inspections are conducted during daylight hours during both dry weather and storm events. Inspections are conducted during dry periods to allow facilities to identify and address any problems prior to a storm event, thereby minimizing the chance for storm water contamination. Inspections are also conducted during significant storm events to ensure that pollution prevention practices are functioning as intended. The frequency of inspections is specified in the addendum.

Inspections are documented, and the following information is recorded:

- When inspection was performed
- Who conducted the inspection
- What areas were inspected
- What conditions were observed
- Any steps taken immediately to resolve concerns or deficiencies
- Status of previously identified concerns or deficiencies
- Corrective actions taken to resolve deficiencies
- The amount of time between identifying and correcting a deficiency.

Concerns are entered into the INEEL Issue Communication and Resolution Environment (ICARE) system and tracked to ensure they are resolved. Deficiencies must be corrected as soon as practicable, but not later than within 14 days of an inspection.

3.2.9 Compliance Evaluation

Comprehensive site compliance evaluations are performed at least once a year as required by the General Permit. The evaluation identifies whether potential pollution sources, drainage maps, and pollution prevention practices in the SWPPP-IA are accurate and complete. Results are documented in the addenda and used to assess the effectiveness of the SWPPP-IA. At a minimum, the following tasks are performed as part of the comprehensive site compliance evaluations:

- Identify any changes to the SWPPP-IA Team Member roster
- Inspect storm water drainage areas and their outfalls for evidence of pollutants entering the drainage system
- Inspect all facility areas of concern identified in the SWPPP-IA
- Evaluate effectiveness of pollution prevention practices and whether additional practices are needed
- Evaluate any operational changes that may require additional pollution prevention practices
- Observe all structural storm water management measures, sediment and erosion control measures, and other structural pollution prevention measures to ensure proper operation
- Inspect equipment needed to implement the SWPPP-IA (for example, spill response equipment)
- Prepare a report summarizing the scope of the evaluation, personnel making the evaluation, major observations relating to implementation, corrective actions, and schedule
- Document incidents of noncompliance in the report. If there are no incidents of noncompliance, provide a certified statement that the facility is in compliance with the General Permit.

After the evaluation, the following tasks are required:

- Revise the SWPPP-IA within 2 weeks after completing the evaluation, as required by the General Permit
- Implement necessary changes to equipment, operations, and other pertinent activities before the next anticipated storm, or not more than 12 weeks after completing the evaluation, as required by the General Permit
- Prepare and certify reports of corrective actions.

3.2.10 Recordkeeping

Storm water pollution prevention plans and all reports required by the General Permit shall be retained for at least 3 years after the latest modification and at least 3 years after coverage under the General Permit terminates. The following records are under the custody of the industrial storm water coordinator:

- The SWPPP-IA
- Correspondence with EPA
- Inspection reports and corrective action records

- Comprehensive site compliance evaluations
- Reports of spills to the Big Lost River System.

Other documentation is maintained as follows:

- Preventive maintenance records are maintained by the performing organization
- Reports of spills or leaks are maintained by the BBWI spill notification team
- Storm water monitoring data are maintained by the storm water monitoring coordinator
- Training records are maintained by the training organization
- Copy of the General Permit is included in this SWPPP-IA, Appendix C.

3.3 Monitoring

The objectives of storm water monitoring are to demonstrate compliance with the regulatory requirements delineated in the General Permit and satisfy the requirements identified in DOE Order 5400.1, "General Environmental Protection Program." Samples and measurements taken for the purposes of monitoring shall be representative of the monitored activity and according to the *NPDES Storm Water Sampling Guidance Document* (EPA 1992a). Storm water discharges from the following activities shall be monitored:

- Transportation equipment manufacturing at SMC (Sector AB)
- Hazardous waste treatment, storage, or disposal at INTEC and RWMC (Sector K)
- Landfills at RWMC; ash pit at INTEC; and Landfills I, III, and III Extension, at CFA (Section L)
- Nonmetallic mineral mining within the corridor of the Big Lost River System (Sector J)
- Coal pile at INTEC.

Monitoring is conducted in accordance with the General Permit requirements and the specific requirements for each sector. Where more than one sector is co-located at a facility, monitoring is conducted for all sector-specific conditions.

Rain or snowmelt events precede storm water monitoring. Precipitation is measured at five meteorological stations on the INEEL. The meteorological stations are maintained by the National Oceanic and Atmospheric Administration at the following locations:

- Argonne National Laboratory West
- CFA
- Test Area North (TAN)

- RWMC
- Grid-III Tower (east of Test Reactor Area and north of INTEC).

Samples are collected for laboratory analysis or visual examination. Monitoring must be conducted according to test procedures under 40 CFR 136. Parameters are those specified in the General Permit, which do not include radionuclides. Exceptions are a few additional parameters monitored for characterization purposes.

The storm water monitoring requirements are implemented using the *Storm Water Monitoring Program Plan* (BBWI, PLN-731) and "Site-Specific Requirements for Storm Water" (BBWI, Technical Procedure [TPR]-6556 Rev. 3). The two implementing documents address the following:

- Monitoring locations
- Visual water quality monitoring
- Monitoring parameters
- Field, sampling, and decontamination techniques, procedures, and quality control
- Sample control, packaging, and shipping methods
- Flow rate and volume calculations
- Flow appearance (oily sheen, odor, foam, color, clarity)
- Analytical procedures, methods, and results
- Monitoring and reporting frequency
- Data analysis, reduction, validation, reporting, and storage
- Corrective actions.

Monitoring is conducted by BBWI Environmental Monitoring within the Environmental Restoration organization. Monitoring is conducted in accordance with the specific requirements for each sector and are listed in the addendum to this plan for each facility.

Numeric limitations apply to storm water from the coal pile: pH shall be within the range of 6.0 to 9.0. A numeric limitation is not applicable for total suspended solids because the coal pile has a retention basin designed to contain a 10-year, 24-hour rainfall event. Numeric limitations also apply to discharges associated with dewatering operations at mineral mines. However, the borrow sources at the INEEL are not dewatered, and therefore the limitations do not apply.

The General Permit requires retention of monitoring records for 3 years from the date of sample. Results of monitoring conducted to date are presented in the addenda and in the *1999 Environmental Monitoring Program Report* (INEEL/EXT-2000-00318). Analytical monitoring results are reported to the EPA if there was a discharge to the Big Lost River System.

Personnel who participate in the visual examination are fully knowledgeable about the storm water pollution prevention plan, the sources of contaminants on the site, the industrial activities conducted that are exposed to storm water, and the day-to-day operations that may cause unexpected pollutant releases. Participants should include the field team lead for storm water monitoring, the facility storm water coordinator, and an Operations representative. The participants should attempt to relate the results of the examination to the potential sources of storm water contamination in the drainage area of the monitoring point. When contamination is observed, the participants should evaluate the effectiveness of implemented pollution prevention practices and whether or not additional pollution prevention measures should be implemented. If pollution prevention practices are not effective, corrective action must be implemented. A tracking system (ICARE) must be used to ensure that appropriate actions are taken in response to the examinations. Visual water quality examination reports must be certified.

4. POLLUTION SOURCES FROM AND PRACTICES FOR TRANSPORTATION ACTIVITIES

This section describes potential pollutant sources from transportation activities and pollution practices.

Figure 4-1 shows the paved roads and railroads outside of facility boundaries. The INEEL has roads open to the general public and roads closed to the public. In addition, there are unpaved roads and trails within INEEL boundaries. The INEEL roads are maintained by BBWI according to DOE standards. The roads open to the general public are federal and state highways and are maintained by the State of Idaho.

The EPA clarified that "immediate access roads" refer to roads that are exclusively or primarily dedicated for use by the industrial facility. At the INEEL, immediate access roads include roads within facilities and connecting facilities, but they do not include roads open to the general public and trails.

Rail freight service to the INEEL is via the Mackay branch of the Union Pacific Railroad in the southern part of the INEEL. An INEEL railroad track passes north from the Mackay Branch through CFA, then past INTEC to the Naval Reactor Facility (see Figure 4-1). A spur runs west to connect the track to the INTEC fuel storage facility. The RWMC is serviced by a separate rail spur running north from the Mackay branch. Commercial engines and BBWI crews move the freight cars from Scoville to INEEL facilities. The INEEL railroads are maintained by BBWI according to DOE standards.

All materials used for operations are transported to the INEEL either by vehicle or by rail car. In addition, the wastes generated are shipped within the INEEL by vehicle. Wastes are shipped to non–INEEL facilities by either rail car or vehicle. Some of the INEEL facilities accept non-INEEL wastes, and those wastes are transported to the INEEL by rail car or vehicle.

Several pollution prevention practices are implemented to reduce the potential for environmental releases of materials and wastes transported on INEEL roads and railroads. The practices are as follows:

- All waste and hazardous materials shipments are packaged and transported in accordance with Department of Transportation requirements.
- When necessary, vehicles and rail cars transporting uncontainerized material (salt, coal, trash) in open beds are covered to prevent the potential of wind–blown materials.
- The antifreeze used for the bus and transport vehicle fleet at the INEEL is being converted from antifreeze containing ethylene glycol to antifreeze containing propylene glycol, which poses less of a risk if spilled.
- During the winter months, roads undergo regular snow removal as necessary to reduce the risk of accidents and potential spills. In addition, salt and sand are applied to icy stretches of roads during the winter months. In periods of extremely inclement winter weather, roads may be closed.
- INEEL roads are regularly maintained to ensure structural integrity, which aids in preventing accidents.

Click here to view Figure 4-1

Figure 4-1. Idaho National Engineering and Environmental Laboratory roads and railroads.

- All spills are reported to the BBWI spill notification team (BBWI, MCP-3480). Spills typically involve petroleum products and are cleaned up within 24 hours *(Water Quality Standards and Wastewater Treatment Requirements*, Idaho Department of Environmental Quality).

- Transportation emergencies are mitigated according to the *INEEL Emergency Plan/RCRA Contingency Plan*, Addendum 9, "Transportation" (BBWI, Manual 16A, Addendum 9).

No significant spills have occurred on the INEEL roads and railroads since June 1995. Criteria for significant spills are presented in Subsection 3.2.3, "Spill Prevention and Response."

5. RESPONSIBILITIES

5.1 Facility or Activity Storm Water Teams

Facility or activity storm water pollution prevention teams assist management in the development, implementation, and revision of the addenda. The team leaders are responsible for conducting periodic inspections and preparing corrective actions reports. Team members participate in the periodic inspections. Team leaders, or an alternate if the team leader is unavailable, participate in visual water quality examinations, and the team leaders participate in the annual compliance evaluations. Team leaders track the resolution of concerns identified during inspections, visual water quality examinations, and compliance evaluations.

5.2 Facility Environment, Safety, and Health Manager and Site Area Director

Facility Environment, Safety, and Health (ES&H) managers and the site area director ensure or provide resources for the development, implementation, maintenance, and revision of the SWPPP-IA. The facility ES&H manager's and the site area director's signatures are required on the appropriate addendum, visual examinations, compliance evaluations, and corrective actions reports associated with the compliance evaluation.

5.3 Storm Water Monitoring Coordinator

The storm water monitoring coordinator ensures storm water is monitored in accordance with the General Permit and maintains monitoring records.

5.4 Industrial Storm Water Coordinator

The industrial storm water coordinator is responsible for the overall coordination and implementation of the SWPPP-IA. The coordinator is the point of contact for the DOE-ID Environmental Technical Support Division. The coordinator performs the following tasks:

- Maintains compliance records as previously specified in Section 3 "Requirements"
- Obtains precipitation data from the National Oceanic Atmospheric Administration and relays it to monitoring personnel
- Coordinates compliance evaluations and signs the evaluations reports
- Provides training material
- Prepares the discharge monitoring reports for submittal to EPA.

5.5 BBWI Environment, Safety, Health, and Quality Assurance General Manager

The Environment, Safety, Health and Quality Assurance (ESH&QA) General Manager is the BBWI representative who certifies SWPPP-IAs, visual examination reports, evaluation reports, reports of corrective actions resulting from evaluations, and spill reports. Notification of a duly authorized representative was transmitted to EPA (Appendix A).

5.6 DOE-ID Environmental Technical Support Division Director

The DOE-ID Environmental Technical Support Division Director is the DOE-ID representative who certifies SWPPP-IAs, visual examination reports, evaluations reports, reports of corrective action resulting from evaluations, and spill reports. Notification of a duly authorized DOE-ID representative was transmitted to EPA (see Appendix A).

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7. DEFINITIONS

Discharge-related activities—Includes activities that cause, contribute to, or result in storm water point source pollutant discharges; and measures to control storm water discharges including the siting, construction, and operation of pollution prevention practices to control, reduce, or prevent storm water pollution (EPA 2000).

Pollutant—Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials [except those regulated under the Atomic Energy Act of 1954, as amended (42 U.S.C. 2011 *et seq.*], heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water. It does not mean: (a) sewage from vessels; or (b) water, gas, or other material that is injected into a well to facilitate production of oil or gas, or water derived in association with oil and gas production and disposed of in a well, if the well used either to facilitate production or for disposal purposes is approved by authority of the State in which the well is located, and if the State determines that the injection or disposal will not result in the degradation of ground or surface water resources. (40 CFR 122) NOTE: Radioactive materials covered by the Atomic Energy Act are those encompassed in its definition of source, byproduct, or special nuclear materials. Examples of materials not covered include radium and accelerator-produced isotopes.

Pollution prevention practice—Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to waters of the United States. Pollution prevention practices also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Significant materials—Includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of CERCLA; any chemical the facility is required to report pursuant to EPCRA Section 313; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges (EPA 1995).

Storm water—Storm water runoff, snow melt runoff, and surface runoff and drainage (EPA 1995).

Storm water discharge associated with industrial activity—The discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program. For the categories of industries identified in paragraphs (i) through (x) of this definition, the term includes, but is not limited to, storm water discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at 40 CFR part 401); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and finished products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water. For the categories of industries identified in paragraph (xi) of this definition, the term includes only storm water discharges from all areas (except access roads and rail lines) listed in the previous

sentence where material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water. For the purposes of this paragraph, material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, finished product, by-product or waste product. The term excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas. Industrial facilities (including industrial facilities that are federally, state, or municipally owned or operated that meet the description of the facilities listed in this paragraph (i) to (xi) of this definition) include those facilities designated under 122.26(a)(1)(v). The following categories of facilities are considered to be engaging in "industrial activity" for purposes of this subsection:

(i) Facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards under 40 CFR subchapter N (except facilities with toxic pollutant effluent standards which are exempted under category (xi) of this definition);

(ii) Facilities classified as Standard Industrial Classification 24 (except 2434), 26 (except 265 and 267), 28 (except 283 and 285), 29, 311, 32 (except 323), 33, 3441, 373;

(iii) Facilities classified as Standard Industrial Classification 10 through 14 (mineral industry) including active or inactive mining operations [except for areas of coal mining operations no longer meeting the definition of a reclamation area under 40 CFR 434.11 (1) because the performance bond issued to the facility by the appropriate SMCRA authority has been released, or except for areas of noncoal mining operations which have been released from applicable state or federal reclamation requirements after December 17, 1990] and oil and gas exploration, production, processing, or treatment operations, or transmission facilities that discharge storm water contaminated by contact with or that has come into contact with, any overburden, raw material, intermediate products, finished products, by-products or waste products located on the site of such operations; inactive mining operations are mining sites that are not being actively mined, but which have an identifiable owner/operator;

(iv) Hazardous waste treatment, storage, or disposal facilities, including those that are operating under interim status or a permit under subtitle C of RCRA;

(v) Landfills, land application sites, and open dumps that have received any industrial wastes (waste that is received from any of the facilities described under this subsection) including those that are subject to regulation under subtitle D of RCRA;

(vi) Facilities involved in the recycling of materials, including metal scrapyards, battery reclaimers, salvage yards, and automobile junkyards, including but limited to those classified as Standard Industrial Classification 5015 and 5093;

(vii) Steam electric power generating facilities, including coal handling sites;

(viii) Transportation facilities classified as Standard Industrial Classifications 40, 41, 42 (except 4221-25), 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility that are either involved in vehicle maintenance (including vehicle rehabilitation,

mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, airport deicing operations, or which are otherwise identified under paragraphs (i) to (vii) or (ix) to (xi) of this subsection are associated with industrial activity;

(ix) Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of 1.0 mgd or more, or required to have an approved pretreatment program under 40 CFR part 403. Not included are farm lands, domestic gardens or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with 40 CFR 503;

(x) Construction activity including clearing, grading and excavation activities, except: operations that result in the disturbance of less than five acres of total land area which are not part of a larger common plan of development or sale;

(xi) Facilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, 4221-25, (and which are not otherwise included within categories (i) to (x) (EPA 1995).

Total maximum daily load (TMDL)—A calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards and an allocation of that amount to pollutant sources (EPA 2000).

Water priority chemical—A chemical or chemical categories that: (1) are listed at 40 CFR 372.65 pursuant to Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) (also known as Title III of the Superfund Amendments and Reauthorization Act [SARA] of 1986); (2) are present at or above threshold levels at a facility subject to EPCRA Section 313 reporting requirements; and (3) meet at least one of the following criteria: (i) are listed in Appendix D of 40 CFR Part 122 on either Table II (organic priority pollutants), Table III (certain metals, cyanides, and phenols), or Table V (certain toxic pollutants and hazardous substances); (ii) are listed as a hazardous substance pursuant to Section 311(b)(2)(A) of the CWA at 40 CFR 116.4; or (iii) are pollutants for which EPA has published acute or chronic water quality criteria (EPA 1995).

Water quality-impaired—Refers to a stream, lake, estuary, etc., that is not currently meeting its assigned water quality standards (EPA 2000).

Water quality-limited—Refers to waterbodies for which a State had to develop individual total maximum daily loads (TMDLs), a tool which helps waterbodies meet their water quality standards (EPA 2000).

Waters of the United States—

(1) All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide;

(2) All interstate waters, including interstate “wetlands”;

(3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:

a. Which are or could be used by interstate or foreign travelers for recreational or other purposes;

b. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or

c. Which are used or could be used for industrial purposes by industries in interstate commerce;

(4) All impoundments of waters otherwise defined as waters of the United States under this definition;

(5) Tributaries of waters identified in paragraphs (1) through (4) of this definition;

(6) The territorial sea; and

(7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs 1 through 6 of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet the requirement of the CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States. This exclusion applies only to manmade bodies of water that neither were originally created in waters of the United States (such as disposal area in wetlands) nor resulted from the impoundment of waters of the United States. Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the *Clean Water Act*, the final authority regarding *Clean Water Act* jurisdiction remains with EPA (40 CFR 122).

Appendix A

Correspondence

Appendix A

Correspondence

Appendix A contains correspondence between the INEEL and the EPA:

1. Letter from M. B. Hinman, U.S. Department of Energy, to Steve Bubnick, U.S. Environmental Protection Agency, dated January 5, 1993; Subject: Strategy To Identify "Waters of the United States" at the INEL, AM/SES-EDS-92-494.

2. Letter from P. H. Divjak, BBWI, to U.S. Environmental Protection Agency, dated March 6, 2000, delegating signature authority for BBWI.

3. Letter from J. M. Wilcynski, DOE-ID, to U.S. Environmental Protection Agency, dated May 12, 1998, delegating signature authority for DOE-ID to DOE-ID Environmental Programs and Settlement Agreement Manager.

4. Letter from R. H. Guymon, Bechtel BWXT Idaho, LLC, to Notice of Intent, U.S. Environmental Protection Agency, dated January 25, 2001; Subject: "Storm Water Multi-Sector General Permit for Industrial Activities at the Idaho National Engineering and Environmental Laboratory," RHG-01-05.

5. Letter from R. D. Blew, Stoller Corp., to R. L. Twitchell, U.S. Department of Energy, dated January 4, 2001; Subject: "Storm Water Permit Eligibility Regarding Species Listed as Threatened or Endangered."

6. Letter from B. R. Pace, Bechtel BWXT Idaho, LLC, to S. Neitzel, Idaho State Historical Society; Subject: "Transmittal of Report," BRP-01-01.

7. Letter from B. R. Pace, Bechtel BWXT Idaho, LLC, to D. Yupe, Shoshone-Bannock Tribes; Subject: "Transmittal of Report," BRP-02-01.

Department of Energy
Idaho Field Office
785 DOE Place
Idaho Falls, Idaho 83401-1562

January 5, 1993

Mr. Steve Bubnick
Environmental Protection Agency, Region 10
1200 Sixth Avenue, MS WD134
Seattle, Washington 98101

SUBJECT: Strategy to Identify "Waters of the United States" at the INEL (AM/SES-ESD-92-494)

Dear Mr. Bubnick:

The purpose of this letter is to clarify those areas at the Idaho National Engineering Laboratory (INEL) that should reasonably be considered for NPDES permitting purposes. Discussions between the EPA and DOE-ID in a meeting in Seattle on September 8, 1992, and subsequent telephone conversations in October 1992 between EPA and DOE-ID, addressed the issue of "waters of the United States" for purposes of NPDES permitting or other related activities.

Following is a summary of the key points discussed:

1. The INEL is located in a very arid climate with only 7.5 to 8.5 inches per year of precipitation.

2. The Big Lost River and tributaries within the boundary of the INEL that connect to the Big Lost River are intermittent streams whose channels are dry for extended periods of time because of upstream diversions for irrigation, high channel infiltration rates, and/or limited precipitation in the drainage area on the INEL. There has been no flow onto the INEL from the Big Lost River since 1987. Significant streamflow in the Big Lost River only occurs when an abnormally large snowpack exists. Nearly all runoff events in the intermittent tributaries that connect to the Big Lost River occur when a standard set of hydrologic conditions are present. These hydrologic conditions that must be present to induce significant runoff include antecedent conditions of frozen soil and a significant snowpack (12 to 24 inches of snow) followed by two to three days of warm rain (in excess of 1 inch to 1 and 1/2 inches). These conditions exist only infrequently (probably on the order of only two or three times every thirty to forty years).

3. It is generally recognized that the Big Lost River and those tributaries with defined channels that directly connect to the Big Lost River are considered to be "waters of the United States" (see enclosed map of the Big Lost River System). Also included as "waters of the United States" would be the terminal playas of the Big Lost River (Playa Numbers 1, 2, 3, and 4).

4. Those isolated, intermittent streams, without defined channels directly connecting to the Big Lost River, are not "waters of the United States" for NPDES permitting purposes. These isolated, intermittent streams often have well defined channels in areas of significant topographic relief, however, as the topographic relief becomes insignificant, the channels become poorly defined and disappear. The disappearance of the defined channels is due largely to the decrease in stream velocity, high infiltration rates, and a subsequent spreading of the water over a large area (sheet flow). Occasionally, an isolated, intermittent channel may enter a series of small shallow depressions before the streamflow disappears. These depressions do not exhibit the geomorphological criteria required to be classified as a playa.

Using the above criteria, at least three facilities at the INEL would have runoff that would be directed to isolated, intermittent streams and would not be subject to NPDES permitting requirements. These facilities include the Power Burst Facility (PBF), Naval Reactors Facility (NRF), and Argonne National Laboratory - West (ANL-W) (see enclosed map). The above facilities will participate in the INEL Stormwater Pollution Prevention Plan because their operations are directly associated with the rest of the INEL (haul roads, bus line, railroad, etc.). However, because the potential to discharge to "waters of the United States" is practically non-existent at the above facilities, DOE will develop and implement a less complex and less costly plan than for those facilities with direct connections to the Big Lost River. For other NPDES permitting purposes, runoff from the above facilities into isolated, intermittent streams would not be considered as runoff into "waters of the United States."

If you have questions or comments on this strategy to identify the location of "waters of the United States" at the INEL, please contact C. M. Bennett, of my staff, at (208) 526-3734.

Sincerely,

Peggy Hinman

M. B. Hinman, Director
Environmental Support Division

Enclosure

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EXTERNAL bcc DISTRIBUTION:

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CONCURRENCE:

AM/SES GES 12/4/92

OCC M.D.C. 12/02/92

DOE-CH _____

DOE-IBO _____

RECORD NOTES:

1. Tiger Team Finding SW/BMPF-2.AP02, Milestone 1 states, "Compile information from surface water investigations and define and delineate "waters of the U.S.," as defined at 40 CFR 122, located on the INEL." The identification of "waters of the U.S." is an important consideration in the determination of the applicability of rules and regulations related to the Clean Water Act to the INEL. Examples include facilities that discharge wastewaters to surface water, storm water discharges from industrial activity, and storm water discharges from construction activities.

2. "Waters of the U.S.," as defined initially in conversations with EPA Region 10 were as inclusive as "waters which are, or would be, used by other migratory birds which cross state lines," i.e., if a duck can ever land, drink, or otherwise use the water, it was considered by EPA to be "waters of the U.S."

3. The enclosed map of the Big Lost River System does not include all of the INEL which may contain "waters of the U.S." Other areas of intermittent streamflow which drain into terminal playas other than the Big Lost River at the INEL or into the Snake River drainage basin along the eastern and southern edges of the INEL are not included.

4. This correspondence was prepared by C. M. Bennett (SES) and discussed with P. Hinman (SES); E. D. Walker, T. Brock and L. Gwinn (EG&G), and M. M. Garvey and B. Bowhan (OCC).

5. The attached correspondence affects the Naval Nuclear Propulsion Program. NRF/IBO is included under the sitewide general permit for storm water discharges.

CMBennett (AM/SES-ESD): rrhickey, x6-6521, 12/01/92, A:H2OUS.CMB
(File 1.4.E)

NOTE: 12/23/92 - Key point #4 has been rewritten by M. Garvey (OCC) to simplify what has already been stated.

INEEL
Idaho National Engineering & Environmental Laboratory
BECHTEL BWXT IDAHO, LLC

P.O. Box 1625
2525 North Fremont Ave.
Idaho Falls, Idaho 83415
(208) 526-0111

March 6, 2000

CCN: 00-005722

Mr. Charles C. Clarke
Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, RA-140
Seattle, WA 98101

CERTIFICATION OF STORM WATER DOCUMENTS

Dear Mr. Clarke:

Bechtel BWXT Idaho (BBWI) received coverage during 1999 as a co-permittee at the Idaho National Engineering and Environmental Laboratory (INEEL) under the following National Pollutant Discharge Elimination System permits:

- General Permit for Storm Water Discharges from Construction Activities (Federal Register, February 17, 1998), Permit Number IDR10A432

- Modified Storm Water Multi-Sector General Permit for Industrial Activities (Federal Register, September 30, 1998), Permit Number IDR05A296.

As the BBWI Operations Vice President, I am delegating authority to certify storm water documents under both the construction and industrial permits to the position of Environmental, Safety, Health & Quality Assurance General Manager. That position has overall responsibility for environmental, safety, health, and quality matters at INEEL facilities under the cognizance of BBWI. If additional information is needed to clarify the delegation, please contact Richard S. Watkins, ESH&QA General Manager, at (208) 526-7191.

DRB:caq

Sincerely,

For
Paul H. Divjak
Vice President of Operations

cc: K. Collins, U.S. EPA
D. L. Korkukluoglu, BBWI, MS 3560

bcc: BBWI
D. R. Braun, MS 4110
J. F. Graham, MS 4110
R. H. Guymon, MS 3428
J. D. Hops, MS 3899
M. D. Olsen, MS 3899
E. D. Walker, MS 4110
R. S. Watkins, MS 3428
P. H. Divjak File (PHD-34-00)
Correspondence Control, MS 3601

Uniform File Code: 6106/CFL-2
Disposition Authority: ENV1-K-1
Retention Schedule: Pending

Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

May 12, 1998

Mr. Charles C. Clark
U.S. Environmental Protection Agency, Region 10
Waste Water Management & Enforcement Branch
1200 Sixth Avenue, MS WD-135
Seattle, Washington 98101

SUBJECT: Transfer of Signature Authority for Certification of Storm Water Pollution Prevention Plans and Other Signature Requirements of the General Permit at the Idaho National Engineering Laboratory to a Duly Authorized Representative OPE-EP&SA-98-091)

Dear Mr. Clark:

The Department of Energy, Idaho Operations Office (DOE-ID) received coverage in 1993 under NPDES General Permits, IDROOA194, to discharge storm water from Industrial activity at the Idaho National Engineering Laboratory (INEL), Idaho to waters of the United States. An NOI for construction activity was submitted on May 12, 1998.

The DOE-ID Manager, J. M. Wilcynski, was the Signature Authority for Certification Statements related to the NPDES General Permits under the provisions of 40 CFR 122 from 1993 to December 1995. The DOE-ID Environmental Programs Manager has been the Signature Authority for Certification from December 1995 to present. By this letter, the DOE-ID Manager is giving notification to the Director of the transfer of signature authority to the DOE-ID Environmental Programs and Settlement Agreement Manager as the Manager's duly authorized representative for the NPDES General Permit (40 CFR 122.22(b)(1), (2) and (3)). The DOE-ID Environmental Programs and Settlement Agreement Manager has overall responsibility for environmental matters at INEL facilities under the cognizance of DOE-ID.

If additional information or discussion is needed to clarify this notification, please contact Mike Bennett at (208) 526-3734.

Sincerely,

J. M. Wilcynski
Manager

INEEL
Idaho National Engineering & Environmental Laboratory
BECHTEL BWXT IDAHO, LLC

P.O. Box 1625
2525 North Fremont Ave.
Idaho Falls, Idaho 83415
(208) 526-0111

January 25, 2001

CCN 16963

Storm Water Notice of Intent (4203M)
U.S EPA
1200 Pennsylvannia Avenue, NW
Washington, D.C. 20460

STORM WATER MULTI-SECTOR GENERAL PERMIT FOR INDUSTRIAL ACTIVITIES AT THE IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY

The Idaho National Engineering and Environmental Laboratory (INEEL) wishes to seek coverage under the National Pollutant Discharge Elimination System Storm Water Multi-Sector General Permit published in the Federal Register on October 30, 2000. It is our understanding that administratively extended permit coverage under the Multi-Sector General Permit for Industrial Activities published September 30, 1998 and issued to the INEEL will continue until a Notice of Intent (NOI) is submitted for coverage under the 2000 General Permit no later than January 29, 2001. Storm water discharge for industrial activity at the INEEL is presently covered under permit IDR05A45F issued to the U S Department of Energy Idaho Operations Office (DOE-ID) and IDR05A296 issued to Bechtel BWXT Idaho, LLC (BBWI). The area of coverage includes the industrial activities within the 890 square mile area that comprises the INEEL that have the potential to have storm water discharge to waters of the United States.

Both DOE-ID and BBWI have certified the enclosed NOIs as the operator of the permitted facility. DOE-ID has determined that dual certifications best reflect the actual apportionment of responsibility under the regulations. BBWI is the management and operation contractor for DOE-ID at the INEEL under a five-year contract. BBWI operates a large portion of the INEEL for DOE-ID and is responsible for the storm water permit activities within its area of responsibility. DOE-ID is the federal owner of the INEEL and is also an operator in the sense that it controls and allocates funding, and provides oversight of BBWI. DOE-ID is also responsible for decisions concerning policy, programmatic direction, funding, and prioritization. It should also be noted that although BBWI has some responsibilities for administering the permit at the INEEL, BBWI does not administer industrial activities at other areas administered separately by DOE-ID.

If you need additional information or have questions related to theses NOIs, please contact Dennis Walker, BBWI at (208) 526-0226 or Mike Bennett, DOE-ID at (208) 526-3734.

Sincerely,

Ronald H. Guymon, Director
Environmental Affairs

EDW:caq

Attachments

cc: C. M. Bennett, DOE-ID, MS 1146
B. R. Bowhan, DOE-ID, MS 1209
J. R. Cooper, DOE-ID, MS 1154
R. M. Kauffman, DOE-ID, MS 1146
R. L. Knighten, DOE-ID, MS 4202
T. L. Perkins, DOE-ID, MS 1146
T. J. Safford, DOE-ID, MS 4109
L. A. Sehlke, BBWI, MS 3810

NPDES Form 3510-6

United States Environmental Protection Agency
Washington, DC 20460

Form Approved
OMB No. 2040-0086

Notice of Intent for Storm Water Discharges Associated with INDUSTRIAL ACTIVITY Under the Multi-sector NPDES General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the entitiy in Section B intends to be authorized to discharge pollutants to waters of the United States, from the facility or site identified in Section C, under EPA's Storm Water Multi-sector General Permit (MSGP). Submission of the NOI also constitutes notice that the party identified in Section B of this form has read, understands, and meets the eligibility conditions of Part I of the MSGP; agrees to comply with all applicable terms and conditions of the MSGP; understands that continued authorization under the MSGP is contigent on maintaining eligibility for coverage, and that implementation of the permittee's pollution prevention plan is required two days after a complete NOI is mailed. In order to be granted coverage, all information required on this form must be completed. Please read and make sure you comply with all permit requirements, including the requirement to prepare and implement a storm water pollution prevention plan.

A. Permit Selection

Permit number assigned to your facility under the previous permit: IDR05A45F

New Permit Number (EPA Use Only): R05

B. Facility Operator Information

1. Name: US DEPT OF ENERGY IDAHO OPS 2. Phone: 2085267177

3. Mailing Address: a. Street or P.O. Box: 850 ENERGY DRIVE MS1146

b. City: IDAHO FALLS c. State: ID d. Zip Code: 83401-1563

C. Facility/Site Information

1. Facility/Site Name: IDAHO NATL ENGG & ENVIRON LAB

2. Location Address: a. Street: 43 MILES WEST OF IDAHO FALLS

b. City: IDAHO FALLS c. County: BUTTE

d. State: ID e. Zip Code: 83415-1563

3.a. Latitude: 43°43'23" b. Longitude: 112°45'10"

4.a. Permit Applicant: ☒ Federal ☐ State ☐ Tribal ☐ Private ☐ Other public entity

b. Is the facility located on Indian Country Lands? ☐ Yes ☒ No

5. Does the facility discharge storm water into:

a. Receiving water(s)? ☒ Yes ☐ No If yes, name(s) of receiving water(s): BIG LOST RIVER

b. A municipal separate storm sewer system (MS4)? ☐ Yes ☒ No

If yes, name of the MS4 operator:

6. The 4-digit Standard Industrial Classification (SIC) codes or the 2-letter Activity Codes that best represent the principal products produced or services rendered by your facility and major co-located activities:

Primary: HZ Secondary (if applicable): 3795

7. Applicable sector(s) of industrial activity, as designated in Part 1.2.1 of the MSGP, that include associated discharges that you seek to have covered under this permit (choose up to three):

☐ Sector A	☐ Sector F	☒ Sector K	☐ Sector P	☐ Sector U	☐ Sector Z
☐ Sector B	☐ Sector G	☒ Sector L	☐ Sector Q	☐ Sector V	☐ Sector AA
☐ Sector C	☐ Sector H	☐ Sector M	☐ Sector R	☐ Sector W	☒ Sector AB
☐ Sector D	☐ Sector I	☐ Sector N	☐ Sector S	☐ Sector X	☐ Sector AC
☐ Sector E	☒ Sector J	☐ Sector O	☐ Sector T	☐ Sector Y	☐ Sector AD

8. Additional Facility/Site Requirements:

a. Based on the instructions provided in Addendum A of the MSGP, have the eligibility criteria for "listed species" and critical habitat been met? ☒ Yes ☐ No

b. Based on the instructions provided in Addendum B of the MSGP, have the eligibility criteria for protection of historic properties been met? ☒ Yes ☐ No

D. Certification

Do you certify under penalty of law that this document and all attachments were prepared under your direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted? Based on your inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, do you certify that the information submitted is, to the best of your knowledge and belief, true, accurate, and complete? Do you certify that you are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations?

Print Name: BEVERLY A COOK

Signature: Beverly A. Cook Date: 01/24/01

NPDES Form 3510-6

United States Environmental Protection Agency
Washington, DC 20460

Form Approved
OMB No. 2040-0086

Notice of Intent for Storm Water Discharges Associated with INDUSTRIAL ACTIVITY Under the Multi-sector NPDES General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the entitly in Section B intends to be authorized to discharge pollutants to waters of the United States, from the facility or site identified in Section C, under EPA's Storm Water Multi-sector General Permit (MSGP). Submission of the NOI also constitutes notice that the party identified in Section B of this form has read, understands, and meets the eligibility conditions of Part I of the MSGP; agrees to comply with all applicable terms and conditions of the MSGP; understands that continued authorization under the MSGP is contigent on maintaining eligibility for coverage, and that implementation of the permittee's pollution prevention plan is required two days after a complete NOI is mailed. In order to be granted coverage, all information required on this form must be completed. Please read and make sure you comply with all permit requirements, including the requirement to prepare and implement a storm water pollution prevention plan.

A. Permit Selection

Permit number assigned to your facility under the previous permit: IDR05A296

New Permit Number (EPA Use Only): R05

B. Facility Operator Information

1. Name: BECHTEL BWXT IDAHO LLC 2. Phone: 2085260226

3. Mailing Address: a. Street or P.O. Box: PO BOX 1625 MS 4110

b. City: IDAHO FALLS c. State: ID d. Zip Code: 83415-

C. Facility/Site Information

1. Facility/Site Name: IDAHO NATIONAL ENGINEERING & ENVIRONMENTAL LAB

2. Location Address: a. Street: 43 MILES WEST OF IDAHO FALLS

b. City: IDAHO FALLS c. County: BUTTE

d. State: ID e. Zip Code: 83415-

3.a. Latitude: 43° 43' 23" b. Longitude: 112° 45' 10"

4.a. Permit Applicant: ☐ Federal ☐ State ☐ Tribal ☒ Private ☐ Other public entity

b. Is the facility located on Indian Country Lands? ☐ Yes ☒ No

5. Does the facility discharge storm water into:

a. Receiving water(s)? ☒ Yes ☐ No If yes, name(s) of receiving water(s): BIG LOST RIVER

b. A municipal separate storm sewer system (MS4)? ☐ Yes ☒ No

If yes, name of the MS4 operator:

6. The 4-digit Standard Industrial Classification (SIC) codes or the 2-letter Activity Codes that best represent the principal products produced or services rendered by your facility and major co-located activities:

Primary: HZ Secondary (if applicable): 3795

7. Applicable sector(s) of industrial activity, as designated in Part 1.2.1 of the MSGP, that include associated discharges that you seek to have covered under this permit (choose up to three):

☐ Sector A	☐ Sector F	☒ Sector K	☐ Sector P	☐ Sector U	☐ Sector Z
☐ Sector B	☐ Sector G	☒ Sector L	☐ Sector Q	☐ Sector V	☐ Sector AA
☐ Sector C	☐ Sector H	☐ Sector M	☐ Sector R	☐ Sector W	☒ Sector AB
☐ Sector D	☐ Sector I	☐ Sector N	☐ Sector S	☐ Sector X	☐ Sector AC
☐ Sector E	☒ Sector J	☐ Sector O	☐ Sector T	☐ Sector Y	☐ Sector AD

8. Additional Facility/Site Requirements:

a. Based on the instructions provided in Addendum A of the MSGP, have the eligibility criteria for "listed species" and critical habitat been met? ☒ Yes ☐ No

b. Based on the instructions provided in Addendum B of the MSGP, have the eligibility criteria for protection of historic properties been met? ☒ Yes ☐ No

D. Certification

Do you certify under penalty of law that this document and all attachments were prepared under your direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted? Based on your inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, do you certify that the information submitted is, to the best of your knowledge and belief, true, accurate, and complete? Do you certify that you are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations?

Print Name: PAUL H DIVJAK

Signature: [signature] Date: 01/16/01

Stoller

established 1959

January 4, 2001

Mr. Roger L. Twitchell
NEPA Compliance Officer
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive, MS 1216
Idaho Falls, ID 83401-1563

Subject: Storm water permit eligibility regarding species listed as threatened or endangered.

Dear Mr. Twitchell:

The S.M. Stoller Corp. has been asked to provide information regarding threatened and endangered species occurring on the Idaho National Engineering and Environmental Laboratory (INEEL) for the Notice of Intent for the National Pollutant Discharge Elimination System Storm Water Multi-sector General Permit for Industrial Activities (65 FR 64746).

Twice a year, the U.S. Fish and Wildlife Service provides a notice *of Listed and proposed endangered and threatened species, and candidate species, that may occur within the boundaries of the INEEL-DOE project*. However, for the purposes of the subject permit, the EPA's County/Species list (enclosed) must be used. The species on that list for Bingham, Bonneville, Butte, Clark, and Jefferson Counties are Gray Wolf (*Canis lupus*), Bald Eagle (*Haliaeetus leucocephalus*) and Bull Trout (*Salvelinus confluentus*). The EPA lists Critical Habitat for the Gray Wolf in Bonneville and Clark Counties. The EPA list also indicates that all permittees in Idaho should consider the Canada Lynx (*Lynx canadensis*).

In most of Idaho the Gray Wolf is listed as an experimental, non-essential population. There have been several unconfirmed sightings of the gray wolf on the INEEL during the past decade. None of these sightings were near facility complexes or the Big Lost River. Critical habitat for the Gray Wolf does not exist on the INEEL (see enclosed *Listed and Proposed Endangered and Threatened Species, and Candidate Species, that may occur within the boundaries of the INEEL-DOE Project SP #1-4-00-SP-789* and the *90-Day Confirmation of Species List SP #1-4-00-SP-0075*). The U.S. Fish and Wildlife Service does not designate Critical Habitat for experimental, non-essential populations. Gray wolves in those portions of Bonneville and Clark Counties west of Interstate 15 are in the area designated as experimental, non-essential population. This includes the areas of those counties occupied by the INEEL.

Inventories for Bald Eagles on the INEEL are conducted annually as part of the U.S. Fish and Wildlife Service Mid-winter Bald Eagle Count. Bald Eagles occur on the INEEL only during winter and primarily near the north end of the site near the towns of Howe and Mud Lake. On

The S.M. Stoller Corporation 1780 First Street Idaho Falls, Idaho 83401 (208) 525-9358 FAX (208) 525-3364

rare occasions bald eagles may congregate at the spreading areas near the Radioactive Waste Management Complex. These locations are up gradient of INEEL facilities and their storm water discharges.

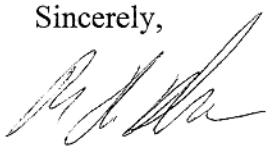
Bull Trout occur in the Little Lost River in Butte County. The Little Lost River terminates before reaching the INEEL and is up gradient of INEEL facilities and storm water discharges. There are no recorded sightings of Canada Lynx on the INEEL. Both of these species are absent from the *Listed and Proposed Endangered and Threatened Species, and Candidate Species, that may occur within the boundaries of the INEEL-DOE Project SP #1-4-00-SP-789* provided by the U.S. Fish and Wildlife Service.

Although absent from the EPA County/Species list, the U.S. Fish and Wildlife Service lists Ute ladies tresses (*Spiranthes diluvialis*) as a threatened species possibly occurring on the INEEL. Although specific surveys for it have not been conducted, it has never been recorded on the INEEL. Suitable habitat for this species has also not been identified on the INEEL.

Based on the instructions given in Addendum A of the Multi-sector General Permit, it is my opinion the INEEL is eligible under Criteria A: *No endangered or threatened species or critical habitat are in proximity to the facility or the point where authorized discharges reach the receiving water.* The Notice of Intent form should be checked "Yes" in Section C, Question 8.a.

If you have any questions about this evaluation, please contact me at the letterhead phone number.

Sincerely,



Roger D. Blew, Ph.D.
Plant Ecologist

Enclosures: As stated

cc: T. L. Perkins, DOE MS 1146
R. M. Kauffman, DOE MS 1146
E. D. Walker, BBWI, MS 4110
D. R. Braun, BBWI, MS 4110
R. H. Guymon, BBWI, MS 3428

ENCLOSURE

LISTED AND PROPOSED ENDANGERED AND THREATENED SPECIES, AND CANDIDATE SPECIES, THAT MAY OCCUR WITHIN THE BOUNDARIES OF THE INEEL-DOE PROJECT SP #1-4-00-SP-789

LISTED SPECIES	COMMENTS
Gray wolf (XN) *(Canis lupus)*	Experimental/Non-essential population
Bald eagle (LT) *(Haliaeetus leucocephalus)*	Occasionally winter on part of INEEL
Ute ladies'-tresses (LT) *(Spiranthes diluvialis)*	

PROPOSED SPECIES

None

CANDIDATE SPECIES

None

The Fish and Wildlife Service has concerns about the following plants and animals. Although these species have no status under the Endangered Species Act, we are concerned about their population status and threats to their long-term viability. In context with ecosystem-level management, we suggest that you consider these species and their habitats in project planning and review.

Mammals

Long-eared myotis
(Myotis evotis)

Small-footed myotis
(Myotis ciliolabrum)

Townsend's big-eared bat
(Corynorhinus townsendii)

Pygmy rabbit
(Brachylagus idahoensis)

Merriam's shrew
(Sorex merriami)

Birds

Sage grouse
(Centrocercus urophasianus)

Long-billed curlew
(Numenius americanus)

Ferruginous hawk
(Buteo regalis)

Amphibians and Reptiles

Northern sagebrush lizard
(Sceloporus graciosus graciosus)

Plants

Slender moonwort
(Botrychium lineare)

Painted milkvetch
(Astragalus ceramicus var. *apus)*

GENERAL COMMENTS

LE - Listed endangered
LT - Listed threatened
XN - Experimental/non-essential population
PT - Proposed threatened
C - Candidate

GRAY WOLF (*Canis lupus*) -- The gray wolf is listed as endangered in the coterminous United States, except where it is listed (1) as threatened (Minnesota) or (2) as a nonessential experimental population including Wyoming, and portions of Idaho and Montana. Within the central Idaho area, the nonessential experimental population areas are those portions of Idaho that are south of Interstate Highway 90 and west of Interstate Highway 15, and those portions of Montana south of Interstate Highway 90, Highway 93 and 12 from Missoula, Montana west of Interstate Highway 15. Portions of the Yellowstone Management Area (YMA) in Idaho and Montana are designated as the nonessential experimental population area. The boundaries of the YMA include that portion of Idaho that is east of Interstate Highway 15; that portion of Montana that is east of Interstate Highway 15 and south of the Missouri River from Great Falls, Montana, to the eastern Montana border; and all of Wyoming.

Federal action agencies are required to confer with the Service if their actions are likely to jeopardize the continued existence of gray wolves; or you have the option of conferring with the Service regardless of the determination.

UTE LADIES'-TRESSES (*Spiranthes diluvialis*) has the potential to occur in wetland and riparian areas including springs, wet meadows, and river meanders. The plant is known to occur at sites ranging from 1,500 to 7,000 feet in elevation. This species generally flowers from mid-July through September, and can be identified definitively only at that time. The orchid can remain dormant for several years; therefore, we suggest surveys for the orchid be scheduled for sequential years. The species may be adversely affected by modification of riparian and wetland habitats associated with livestock grazing, vegetation removal, excavation, construction for residential or commercial purposes, stream channelization, hydroelectric development and operation, and actions that alter hydrology.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Snake River Basin Office, Columbia River Basin Ecoregion
1387 South Vinnell Way, Room 368
Boise, Idaho 83709

DEC 0 1 2000

Timothy D. Reynolds, Research Ecologist
Environmental Science and Research Foundation
101 South Park Avenue, Suite 2
P.O. Box 51838
Idaho Falls, Idaho 83405-1838

Subject: 90 - Day Confirmation of Species List
SP #1-4-01-SP-0075/Updates SP #1-4-00-SP-789/File #506.0000

Dear Mr. Reynolds:

The U.S. Fish and Wildlife Service (Service) is writing to update the species list SP #1-4-00-SP-789 of September 1, 2000, for the Department of Energy, Idaho National Engineering and Environmental Laboratory. There are no additions or changes to the previous list.

This officially updates the list as of the date of this letter, under the new reference number SP #1-4-01-SP-0075. You should refer to this number in all subsequent correspondence and documentation.

Information concerning Federal agency obligations under the Endangered Species Act has been provided to you in the past. If you would like us to send you any of this information again or if you have questions, please contact Deb Carter of my staff at (208) 378-5261.

Thank you for your continued interest in endangered species conservation.

Sincerely,

Supervisor, Snake River Basin Office

cc: FWS-ES, Chubbuck (Mignogno)

December 2000

IV. COUNTY/SPECIES LIST

The following list identifies federally listed or proposed U.S. species by State and County. It has been updated through December 31, 1999. Species listed below with a status of both E and T are generally either endangered or threatened within the specified county. Designation of critical habitat (CH) d oes not mean that the county constitutes critical habitat, only that critical habitat has been designated for that species (see Addendum A Instructions of the Construction General Permit, or Addendum H instructions of the Multi-Sector Permit).

State/County	Group name	Inverse name	Scientific name	Action/ Status
IDAHO				
NO COUNTY DETAILS–ALL PERMITTEES SHOULD CONSIDER	MAMMALS	LYNX, CANADA	Lynx canadensis	T
ADA	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
ADAMS	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER FALL RUN)	Oncorhynchus tshawytscha	E,CH
		SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
BANNOCK	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
BEAR LAKE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
BENEWAH	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
BINGHAM	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
BLAINE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		SALMON, SNAKE RIVER SOCKEYE	Oncorhynchus nerka	E,CH
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
BOISE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
BONNER	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
		CARIBOU, WOODLAND	Rangifer tarandus caribou	D,E
		WOLF, GRAY	Canis lupus	E,T,CH
BONNEVILLE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
BOUNDARY	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	STURGEON, WHITE (KOOTENAI RIVER POP.)	Acipenser transmontanus	E
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
		CARIBOU, WOODLAND	Rangifer tarandus caribou	E
		WOLF, GRAY	Canis lupus	E,T,CH
BUTTE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
CAMAS	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
CANYON	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
CARIBOU	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
CASSIA	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
CLARK	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
CLEARWATER	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER FALL RUN)	Oncorhynchus tshawytscha	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
		WOLF, GRAY	Canis lupus	E,T,CH

Key: E - Endangered, T - Threatened, CH - Critical Habitat

IV. COUNTY/SPECIES LIST–CONTINUED

[The following list identifies federally listed or proposed U.S. species by State and County. It has been updated through December 31, 1999.]

State/County	Group name	Inverse name	Scientific name	Action/ Status
CUSTER	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		SALMON, SNAKE RIVER SOCKEYE	Oncorhynchus nerka	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
ELMORE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	SNAILS	LIMPET, BANBURY SPRINGS	Lanx n. sp.	E
		SNAIL, BLISS RAPIDS	Family Hydrobiidae n. sp.	T
		SNAIL, SNAKE RIVER PHYSA	Physa natricina	E
		SNAIL, UTAH VALVATA	Valvata utahensis	E
		SPRINGSNAIL, IDAHO	Fontelicella idahoensis	E
FRANKLIN	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
FREMONT	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
		WOLF, GRAY	Canis lupus	E,T,CH
GEM	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
GOODING	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	SNAILS	LIMPET, BANBURY SPRINGS	Lanx n. sp.	E
		SNAIL, BLISS RAPIDS	Family Hydrobiidae n. sp.	T
		SNAIL, SNAKE RIVER PHYSA	Physa natricina	E
		SNAIL, UTAH VALVATA	Valvata utahensis	E
IDAHO	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER FALL RUN)	Oncorhynchus tshawytscha	E,CH
		SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		SALMON, SNAKE RIVER SOCKEYE	Oncorhynchus nerka	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
		WOLF, GRAY	Canis lupus	E,T,CH
	PLANTS	CATCHFLY, SPALDING'S	Silene spaldingii	T
		FOUR-O'CLOCK, MACFARLANE'S	Mirabilis macfarlanei	T
JEFFERSON	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
JEROME	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
KOOTENAI	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
	PLANTS	HOWELLIA, WATER	Howellia aquatilis	T
LATAH	PLANTS	HOWELLIA, WATER	Howellia aquatilis	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
LEMHI	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		SALMON, SNAKE RIVER SOCKEYE	Oncorhynchus nerka	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
LEWIS	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		SALMON, SNAKE RIVER SOCKEYE	Oncorhynchus nerka	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	PLANTS	CATCHFLY, SPALDING'S	Silene spaldingii	T
MADISON	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
MINIDOKA	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T

Key: E - Endangered, T - Threatened, CH - Critical Habitat

IV. COUNTY/SPECIES LIST–CONTINUED

[The following list identifies federally listed or proposed U.S. species by State and County. It has been updated through December 31, 1999.]

State/County	Group name	Inverse name	Scientific name	Action/ Status
NEZ PERCE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER FALL RUN)	Oncorhynchus tshawytscha	E,CH
		SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		SALMON, SNAKE RIVER SOCKEYE	Oncorhynchus nerka	E,CH
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	PLANTS	CATCHFLY, SPALDING'S	Silene spaldingii	T
OWYHEE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (JARBRIDGE RIVER POP)	Salvelinus confluentus	T
	SNAILS	SNAIL, SNAKE RIVER PHYSA	Physa natricina	E
		SPRINGSNAIL, BRUNEAU HOT	Pyrgulopsis bruneauenis	E
		SPRINGSNAIL, IDAHO	Fontelicella idahoensis	E
PAYETTE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
POWER	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	SNAILS	SNAIL, UTAH VALVATA	Valvata utahensis	E
SHOSHONE	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
		WOLF, GRAY	Canis lupus	E,T,CH
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
TETON	MAMMALS	BEAR, GRIZZLY	Ursus arctos (=U.a. horribilis)	T
TWIN FALLS	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	SNAILS	SNAIL, BLISS RAPIDS	Family Hydrobiidae n. sp.	T
		SNAIL, SNAKE RIVER PHYSA	Physa natricina	E
VALLEY	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	SALMON, CHINOOK (SNAKE RIVER FALL RUN)	Oncorhynchus tshawytscha	E,CH
	FISHES	SALMON, CHINOOK (SNAKE RIVER SPRING/SUMMER)	Oncorhynchus tshawytscha	E,CH
		STEELHEAD, SNAKE RIVER BASIN POP	Oncorhynchus mykiss	T
		TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T
	MAMMALS	WOLF, GRAY	Canis lupus	E,T,CH
WASHINGTON	BIRDS	EAGLE, BALD	Haliaeetus leucocephalus	T
	FISHES	TROUT, BULL (COLUMBIA RIVER POP)	Salvelinus confluentus	T

Key: E - Endangered, T - Threatened, CH - Critical Habitat

INEEL
BECHTEL BWXT IDAHO, LLC

P.O. Box 1625
Idaho Falls, Idaho 83415
(208) 526-0111

January 2, 2001

CCN # 16857

Ms. Suzi Neitzel
Deputy State Historic Preservation Officer
Idaho State Historical Society
210 Main Street
Boise, Idaho 83702

REPORT TRANSMITTAL

Dear Ms. Neitzel:

Thank you in advance for your time and consideration of the enclosed report, in duplicate, documenting cultural resource investigations of the Storm Water Pollution Prevention program at the Idaho National Engineering and Environmental Laboratory (INEEL). Please feel free to contact me at 526-0916 if any questions arise during your review.

Sincerely,

Brenda

Brenda Ringe Pace, Archaeologist
INEEL Cultural Resource Management Office

BRP:slt

Enclosures

cc: R. Starck, DOE-ID, MS 1146

bcc: D. R. Braun, MS 4110
R. P. Breckenridge, MS 3600
Correspondence Control, MS 3601
INEEL CRM Files, 2001-05
Brenda Ringe Pace File (2001-01)

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(208) 526-0111

January 2, 2001

CCN # 16854

Ms. Diana Yupe, Cultural Resources Coordinator
Shoshone Bannock Tribes
Heritage Tribal Office
P.O. Box 306, MS28
Fort Hall, ID 83203-0306

REPORT TRANSMITTAL

Dear Ms. Yupe:

Thank you in advance for your time and consideration of the enclosed report documenting cultural resource investigations of the Storm Water Pollution Prevention program at the Idaho National Engineering and Environmental Laboratory (INEEL). Please feel free to contact me at 526-0916 if any questions arise during your review.

Sincerely,

Brenda

Brenda Ringe Pace, Archaeologist
INEEL Cultural Resource Management Office

BRP:slt

Enclosures

cc: R. Pence, DOE-ID, MS 1214
R. Starck, DOE-ID, MS 1146

bcc: D. R. Braun, MS 4110
R. P. Breckenridge, MS 3600
Correspondence Control, MS 3601
INEEL CRM Files, 2001-05
Brenda Ringe Pace File (2001-02)

Appendix B

INEEL Map

Appendix B

INEEL Map

Potential Storm Water Discharge to the Big Lost River System

Click here to view map.

Appendix C

General Permit

Appendix C

General Permit

NPDES Storm Water Multi-Sector General Permit for Industrial Activities.