



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
Curt Fransen, Director

October 21, 2014

CERTIFIED MAIL #7010 3090 0002 3445 3818
RETURN RECEIPT REQUESTED

Mr. Chuck Broschius
Earth Defense Institute
PO Box 220
Troy, ID 83871-0220

RE: Final Decision to Issue the Renewal Partial Permit for HWMA Storage and Treatment for the Liquid Waste Management System at the Idaho Nuclear Technology and Engineering Center on the Idaho National Laboratory (INL, EPA ID No. ID4890008952)

Dear Mr. Broschius:

The Department of Environmental Quality (DEQ) has reached a final decision to approve the Renewal Partial Permit for HWMA Storage and Treatment for the Liquid Waste Management System at the Idaho Nuclear Technology and Engineering Center on the Idaho National Laboratory

A public notice, proposing to approve a Hazardous Waste Facility Permit, appeared in The Idaho Statesman and The Post Register on August 18, 2014. A public hearing was held on September 18, 2014 at the Shiloh Inn in Idaho Falls. The public comment period ended on October 2, 2014 on the draft permit. The purpose of the public notice was to afford the public the opportunity to comment on the draft permit. DEQ did receive your written comments concerning the draft permit. No other comments were received during the public comment period.

In accordance with IDAPA 58.01.05.013 [40 CFR §124.15(a)], the applicant and all persons who submitted comments on the draft permit must be notified when a final permit decision is made. This letter constitutes notification that DEQ, acting under the authority of the Hazardous Waste Management Act of 1983 (HWMA), as amended, hereby approves the draft permit without changes and issues the permit. A copy of the Response to Comments is enclosed.

Because you filed comments on the draft permit, within 30 calendar days of this decision, you may petition the Director to review conditions of the final permit. Petitions shall include a statement of the reasons supporting the review, including a demonstration that any issues being raised were raised during the comment period, to the extent required by these regulations and when appropriate, a showing that the condition in question is based on: (1) A finding of fact or conclusion of law that is clearly

erroneous, or (2) An exercise of discretion or an important policy consideration that the Director should, in his discretion, review in accordance with IDAPA 58.01.05.013 [40 CFR § 124.19(a)]. Unless appealed, this permit shall be effect thirty (30) calendar days from the date of this decision.

Your interest in this permitting action is appreciated..

Sincerely,

A handwritten signature in black ink, appearing to read "Brian R. Monson". The signature is fluid and cursive, with a long horizontal flourish at the end.

Brian R. Monson
Hazardous Waste Program Manager
Waste Management and Remediation Division

BRM:BLE:js EOIRspCml

Enclosure Response to Comments

cc: Barbara McCullough, EPA Region 10
Idaho Falls Regional Office ~ Permits (wo/enc.)
COF

Response to Comments

General Statement

The commenter offered numerous observations and opinions that are not substantive to this permitting action. Comments concerning technology selection, cost overruns, or compliance with the "Idaho/DOE Settlement Agreement" are not addressed because they have no basis in regulation and therefore do not impact the conditions of the draft permit.

Comment:

EDI finds the "new" Volume 14 LWMS permit reapplication slightly better than the original permit but still deficient. Due to the limited comment time (45 days) and huge volume of Permit Volume 14 (~1,389 pages), EDI's comments will be incomplete. This has been correctly called a "paper dump" that no individual or NGO could possibly adequately review in 45 days.

Additionally, the 45-day comment period (ending 8/2/14) provided by IDEQ is inadequate given the importance of this major new operation (Integrated Waste Treatment Unit) IWTU, the failed applied treatment technology and the potential for significant environmental impact. Therefore, EDI requests that the comment period be extended to 120 days.

DEQ Response:

Although the Draft ILWMS Renewal Permit has been available for review since August 18, 2014, the Renewal Permit Application and supporting documents have been publically available since May 14, 2014. Further, while the renewal permit is considered a new permit action, most of the renewal application is the same information included as the December 2, 2013 Revision to the 2004 Permit. Attachment 1 describes the changes identified by the facility between the December 2, 2013 Revision and the draft Renewal Permit. No significant changes (changes equivalent to a Class 3 Permit Modification Request) were included in the renewal application. Changes to the renewal permit from the December 2, 2013 Revision to the October 18, 2004 permit include:

1. Deletion of units closed subsequent to the issuance of the October 18, 2004 Permit;
2. Deletion of completed Compliance Schedule Items;
3. Revision of the Automatic Waste Feed Cut-Off Table for the IWTU (equivalent to a Class 2 Permit Modification);
4. Revision of the definition of application to reflect the renewal application;
5. Updating of Engineering Drawings/Piping and Instrumentation Diagrams; and,
6. Revision of the emergency contact list.

Based on review of the voluminous data submitted by the commenter, the lack of substantive permit related issues; and, based on a substantively unchanged Application/Permit from the December 2, 2013 Revision to the ILWMS Permit, an extension of time for comment on this draft permit is not warranted.

Comment:

DOE's Permit claims the new IWTU will process "approximately 836,000 gallons of mixed liquid waste, containing both hazardous and radioactive components stored in three 300,000- gallon [high-level waste] tanks." These are only current inventories and do not include DOE plans to restart spent nuclear fuel reprocessing that will generate significant volumes of "newly-generated" high-level liquid waste. This is

an enormous amount of extremely deadly waste to treat and the potential for significant emissions that could affect the public and the environment must be recognized.

DEQ Response:

The application identifies that approximately 836,000 gallons of sodium bearing waste in the Tank Farm Facility. The application also identifies that newly generated liquid waste will be treated in the IWTU. It is not the intent of applicable regulations to "limit" the source of waste so long as the waste meets the IWTU Waste Acceptance criteria. Future unit changes and changes to waste acceptance criteria in a final permit would be subject to permit modification procedures and the requisite level of public involvement.

Comment:

The commenter provides a partial summary of start-up issues that have impacted the Integrated Waste Treatment Unit. The commenter did not suggest revisions to any specific permit condition in the renewal permit as a result of the start-up issues.

DEQ Response:

DEQ is aware of the start-up issues associated with the Integrated Waste Treatment Unit. Recovery from the June 2012 event necessitated a Class 3 Permit Modification to the October 18, 2004 Permit. The Draft Permit requires modification of the Permit should equipment changes be necessary or should new information become available. Modifications can be implemented by either the facility or by DEQ.

There were no changes to the draft permit as a result of this comment.

Comment:

*EDI also filed a Public Records request 12/28/06 with IDEQ for RCRA permit documentation and IDEQ responded stating major portions of the request are **denied** based on "trade secrets and business records." Consequently, the public is deliberately denied by IDEQ access to crucial information essential for developing informed consent.*

DEQ Response:

IDAPA 58.01.05.012 [40 CFR §270.12] allows an applicant to assert certain materials be treated as confidential. The applicant identified and provided justification for these materials to be treated as confidential at the time the application was submitted.

There were no changes to the draft permit as a result of this comment.

Comment

Equally egregious is IDEQ arbitrary and capricious requirement that only public comments on permit related to the IWTU will be considered. This means IDEQ will not consider the fundamental illegal "bootstrapping" permit issues are "off-the-table."

DEQ Response:

This comment is inaccurate; the entire draft renewal Permit was open for comment.

No changes were made to the permit as a result of this comment.

Comment:

One of the crucial deficiencies of this new IDEQ Permit is that it only addresses hazardous materials and totally ignores radioactive materials released to the atmosphere. The Permit must address compliance with all applicable regulations related to radioactive emissions.

DEQ Response:

This Hazardous Waste Management Act (HWMA) permit does not address "radioactive materials." Radionuclides are subject to Atomic Energy Act (AEA) regulation, and therefore beyond the jurisdiction of the HWMA.

No changes were made to the permit as a result of this comment.

Comment:

*IDEQ states, "The proposed IWTU is not considered a combustion technology. Although steam reforming is not subject to the Maximum Achievable Control Technology (MACT) standards for hazardous waste combustion, the IWTU is designed to meet these standards." This is a clear obfuscation of Clean Air Act regulatory enforcement. IDEQ is required by law to state that the IWTU **SHALL** meet MACT emission standards.*

The Integrated Waste Treatment Unit (IWTU) "steam reformer" meets the regulatory definition of a "combustion device [40 CFR § 63.111]"

DEQ Response:

The 40 CFR § 63.111 definition cited applies to MACT Requirements for Synthetic Organic Chemical Manufacturing. These requirements are not applicable operations at the Idaho National Laboratory.

DEQ determined that the Integrated Waste Treatment Unit does not meet the definition of a hazardous waste combustor subject to the Hazardous Waste Combustion Maximum Achievable Control Technology (MACT) standards at 40 CFR Part 63 Subpart EEE. This determination relied on the following:

1. The IWTU does not use a controlled flame in that there is no direct fired unit in either of the two treatment chambers (RCRA Online #14266); and,
2. The primary function of the IWTU is not destruction of organic wastes but drying of the acidic solution with subsequent control of the nitrogen oxides and other gases generated in the drying process.

The hazardous waste combustor emission standards were considered when the draft permit was prepared. Predicted emissions have been determined to be protective of human health and the

environment as required at IDAPA 58.01.05.008 [40 CFR Part 264 Subpart X]. The protectiveness standard for the INTEC units will be revisited when actual IWTU emissions are measured during the performance test.

No changes were made to the permit as a result of this comment.

Comment:

"Process Vent" is a broad regulatory category for a major source of hazardous air pollutants that must comply with more restrictive EPA emission regulations. DOE has been and continues to side-step compliance with these emission regulations with bogus assertions that their hazardous and radioactive waste treatment operations are not Process Vents.

The commenter asserts that the Process Equipment Waste Evaporator (PEWE), the Liquid Waste Treatment and Disposal facility (LET&D), the Evaporator Treatment System (ETS), and Integrated Waste Treatment Unit (IWTU) emissions should all be subject to regulation under the process vent standards.

DEQ Response:

The IWTU is not subject to the Process Vent requirements for the following reasons:

1. The IWTU stack does not meet the definition of a vent [see IDAPA 58.01.05.008 (40 CFR § 264.1031)] in that the off-gas is processed through a pollution control system not simply discharged to the atmosphere;
2. The IWTU is not identified as a type of unit subject to regulation as a process vent; and,
3. The volatile organic concentration of the waste being treated appears to be below the level subject to regulation.

Thus the IWTU is not subject to the process vent regulation. Similarly the PEWE and ETS off gas streams are not vented but discharged through the INTEC Main Stack after treatment. DEQ does apply the Process Vent standard to the Liquid Effluent and Treatment Disposal (LET&D) unit because: the volatile organic concentration of the feed likely is above the level subject to regulation; the LET&D is a fractional distillation unit; and the emissions are vented to the main stack without passing through a pollution control device for volatile organic compounds.

The Process Vent Standards have been properly applied to the INTEC Liquid Waste Management Treatment Units.

No changes were made to the permit as a result of this comment.

Comment:

The above DOE Permit does not implement new: "EPA (2005) recommendations that organics and metal emission limits be increased by factors of 2.8 and 1.45 respectively, to account for potential increases in emissions due to process upset conditions." Also, there is no apparent cumulative hazardous/radioactive emissions data for all the INTEC operations using the same Main Stack, other co-located stacks, and the new IWTU stack as required in the regulations.

DEQ Response:

The risk analysis presented in the Draft Permit assumes emissions from the concurrent operation of the PEWE, LET&D, ETS and IWTU. While this risk analysis does not include upset factors, the predicted cumulative risk to human health and the environment is several orders of magnitude below levels of concern. DEQ maintains the risk analysis adequately addresses the protectiveness issue with respect to hazardous constituents. As noted earlier, radionuclide emissions are beyond the scope of this Hazardous Waste Management Act Permit.

No changes were made to the permit as a result of this comment.

Comment:

DOE apparently plans to continue using ~155 tanks listed in previous permits; some compliant, some non-compliant tanks, ancillary service lines and equipment. DOE's 4/14 Permit re-application only lists about ~64 tanks and fails to provide crucial information about each tank. Apparently, all of the functioning tanks are not listed in the Permit.

DEQ Response:

The renewal permit only addresses those tanks listed in the permit that are within the scope of the INTEC LWMS operational boundaries. The list provided by the commenter includes: more than twenty tanks that have been HWMA/RCRA closed; tanks/equipment addressed in other INTEC Partial HWMA Permits; secondary containment sumps for permitted tanks (see IDAPA 58.01.05.008 [40 CFR § 264.190(b)]); tanks not subject to HWMA regulation; and, tanks beyond the INTEC Liquid Waste Management System boundaries.

No changes were made to the permit as a result of this comment.

Comment:

Twelve of the tanks (listed in the Permit) date back to 1951, and nine tanks date back to the 1970s and 1980s, long beyond their 20-year design life. An additional 18 tanks have no "certification stamp." That is a total of 39 tanks that are non-compliant. The ASME design standards for the other tanks are only relevant if the tanks have not already exceeded their design life. DOE must stipulate the ASME design life and age for each of the tanks listed in the PMR along with the anticipated years of future operational use.

Twelve of the CPP-641 listed tanks date back to the early 1950s, 45 years beyond their 20-year design life. Nine of the above tanks put into service in the 1960s and 1980s are also long beyond their design life. An additional four tanks have no certification stamp.

So a total of 26 tanks (just in CPP-641) are not in compliance. The ASME design standards for the other tanks are only relevant if the tanks have not exceeded their design life. DOE must provide documentation on each tanks design life and age to validate their continued use through the operational life of the ILWMS.

The Permit tank table states: "No code stamp required??" The code stamp is a RCRA requirement and is the only legitimate verification that the tank does in fact meet the standard. Again, these tanks are likely beyond their 20-year design life. Therefore, DOE must provide documentation on each tank design life.

Again, the ASME design standards for the tanks are only relevant if the tanks have not exceeded their design life and future operational planned use. DOE must provide documentation on each tanks design life to validate their continued use through the operational life of the ILWMS.

DEQ Response:

The commenter appears to assume that an older tank must be unsound. IDAPA 58.01.05.008 [40 CFR § 264.191] requires that a professional engineer conduct an assessment of the existing tank system certifying that the tank is not leaking and is not unfit for use. The regulation goes on to say this assessment must be kept on file at the facility. This regulation does not address ASME design life.

No changes were made to the permit as a result of this comment.

Comment:

RCRA secondary containment requirement in tank vaults is compromised by DOE's use of "gerry-rigged" Hypalon liners with dubious joint sealants that are not compliant or certified for waste contained in tanks.

ILWMS "Bottoms Tanks" do not meet required secondary containment under RCRA. DOE's Permit states: "The secondary containment is constructed of concrete floor lined with a Hypalon® membrane (registered trademark of DuPont), which extends three feet up the walls. All seams in the secondary containment are heat-welded or adhesive 14 bonded to avoid any cracks or gaps. The membrane is sealed around the tank saddles by silicone rubber 15 sealant that is capable of withstanding the expected waste solutions for extended periods of time."

The above DOE disclosure of use of non-certified "silicone sealant" that is "capable of withstanding the expected waste" for some vague undocumented "extended period of time" is grounds for denial of the Permit under 40 CFR § 270.42 because it does meet regulatory requirements for secondary containment.

DEQ Response:

The commenter speculates that the Hypalon lined vault is non-compliant because it combines a Hypalon liner and "dubious joint sealants" that are not certified for the waste in the tank. The regulations at IDAPA 58.01.05.008 [40 CFR § 264.193] require that the secondary containment be designed, installed and operated to prevent any migration of wastes or accumulated liquid out of the system . . . and that leaks can be detected within 24 hours. The Permit requires liquids be removed from a secondary containment system to the extent practicable within 24 hours of detection. Thus, if the silicone sealant is capable of withstanding the waste for an extended period of time and the waste must be removed within 48 hours (24 hours to detect the liquid in the secondary system and another 24 hours to remove it), DEQ concluded the containment is compliant.

No changes were made to the permit as a result of this comment.

Comment:

Extensive use of old non-compliant "drip troughs" in ancillary service lines instead of the required welded stainless steel secondary containment with continuous monitoring, are grounds for denying the Permit under 40 CFR § 270.42.

DOE's Permit acknowledges secondary containment in waste service piping: Concrete-embedded transfer lines have been identified at the ILWMS. "Drip troughs are located beneath process transfer lines within CPP-604, CPP-605, and CPP-1618. A drip trough also extends below the pipe bridge that spans from CPP-605 to the LLET&D facility. The troughs are designed to collect liquid (e.g., recovered nitric acid in the event of a leak from the process transfer lines. These drip troughs are sloped and drain to collection bottles located within each system. The troughs located within the LET&D facility are not equipped with leak detection devices. Therefore, LET&D collection bottles are inspected daily for the presence of liquid when the fractionators are operating. These inspections are noted on Form INTEC-4055, which is included in Appendix F-J. All drip troughs located in CPP-604, CPP-605, and the pipe bridge are equipped with leak detection cables that are continuously monitored by the DCS."

This is a violation of compliance with 40 CFR § 264.193(f) that requires monitored leak collection and welded stainless steel secondary containment. Although DOE claims its intent to upgrade or reroute these service lines, there is no apparent confirmation that all of these upgrades has occurred.

DEQ Response:

IDAPA 58.01.05.008 [40 CFR § 264.193(f)] does not require welded stainless steel secondary containment only containment that will prevent a release to the environment and be detected within 24 hours. The drip troughs, when combined with permit required inspections, meet these criteria and are not grounds to deny the entire permit.

No changes were made to the permit as a result of this comment.

Comment:

"The Westside Waste Holdup System (VES-WL-103, VES-WL-104, and VES-WL-105) is housed in CPP-641, which is a cinderblock building 22 ft. long and 15 ft. wide. CPP-641 contains the instrumentation, motor control center, sample station, and jet valves for the tanks. The three tanks are located in two underground vaults north of CPP-641. The vault complex is 39 ft. 8 in. long and 20 ft. wide (outside dimensions). The east vault is 18 ft. by 22 ft. by 12 ft. 6 in. high. "

*"The west vault measures 18 ft. by 12 ft. 2 in. by 12 ft. 6 in. high. VES-WL-104 and VES-WL-105 share the east vault; VES-WL-103 is located in the west vault. **The VES-WL-103 vault 2/28/20071414E floor and lower 4 ft. 9 in. of the walls are lined with Hypalon® with a stainless steel insert in the sump. The remainder of the walls and ceiling are coated with an epoxy coating. The VES-WL-104 and VES-WL-105 vault floors and 21 lower 2 ft. 6 in. of the walls are lined with Hypalon® with a stainless steel insert in the sump. The 22 remainder of the walls and ceilings are coated with epoxy coating.**"*

With the exception of the above, the Permit fails to disclose if the required stainless steel secondary containment extends to the tank sumps.

DEQ Response:

The Westside Waste Holdup Tanks are not described in the renewal permit because the tanks were certified closed in March of 2009 in accordance with the approved Closure Plan.

No changes were made to the permit as a result of this comment.

Attachment 1
 Changes in the ILWMS Permit Renewal Application from the October 18, 2004 Permit as Last Revised on December 2, 2013

This is the list of changes in the Volume 14 reapplication.

- Removed a redundant level recorder that was no longer being used (LRA-WL-102) from Table D-9

Section D – Table D-8 page 112

Bottoms Tank	L-WL-101-1	057946	WL-101 Level	Yes	12
VES-WL-101	LRA-WL-101	057946	WL-101 Level	Yes	12

- The table of AWFCOs from the permit was added in Section D. – as Table D-6. (see below) and remaining Tables in Section D were renumbered accordingly

Table D—6. IWTU Automatic Waste Feed Cutoff

DCS Instrument	Function	AWFCO Actuation
YS-C-401-11	Hydrogen deflagration protection	Tripped
YS-C-402-21	High temperature protection system	Tripped
YS-H-403-31	High CO detection system	Tripped
L-C-231-3	Seal water tank level	<9 inches WC
FY-C-140-1	Total feed rate	≥3.5 gpm
VOL-C-131-2	Waste feed tank volume	<200 gal
P-C-131-1A/B	Feed pump discharge pressure (one pump in use, one on standby)	<20 PSIG
TC-C-140-9	DMR average bed temperature	<580 C
TC-C-140-9	DMR average bed temperature	≥680 C
TDY-C-140-9	Temperature difference across DMR bed	≥50 C
P-C-140-1/7	DMR freeboard pressure (both)	<1 PSIG
P-C-140-1/7	DMR freeboard pressure (both)	≥10 PSIG
DCS Instrument	Function	AWFCO Actuation
AC-C-153-1	Hydrogen in DMR/PGF off-gas average	<1.5% (rolling 10 minute average dry basis)
AC-C-153-1	Hydrogen in DMR/PGF off-gas average	>15% (rolling 10 minute average dry basis)
FY-B-365-1	SSV	<0.4 ft/sec
FY-B-365-1	SSV	≥1.6 ft/sec
P-B-365-11A	N2/steam pressure to fluidizing gas superheater	>45 PSIG
T-B-365-17	DMR fluidizing gas temperature average	<430 C
P-C-153-11	PGF rupture Disk pressure	≥12 PSIG
PD-C-153-1	Differential Pressure across the PGF	>81 in. W.C.
TC-C-160-4	CRR average bed temperature	≥1100 C
TC-C-160-4	CRR average bed temperature	<850 C
TDY-C-160-4	Temperature difference across CRR bed	>50 C
P-C-760-10/16	CRR Exit Gas Pressure (both)	≥0
AC-C-760-1	O2 concentration in the CRR off-gas outlet (AVG)	>8 Vol% (average wet basis)

DCS Instrument	Function	AWFCO Actuation
AC-C-760-1	O2 concentration in the CRR off-gas outlet (AVG)	<1.0 Vol% (average wet basis)
PD-C-160-3	Differential Pressure across the OGF	>81 in. W.C.
T-C-160-1A/1B	Temperature after the off-gas cooler (either)	>205 C
T-C-160-1A/1B	Temperature after the off-gas cooler (either)	<130 C
P-C-160-12	OGC rupture disk pressure	>2.9 PSIG
I-H-260-1A/B	Off-gas blowers current (both)	<35 amps (after 10 second delay)
DCS Instrument	Function	AWFCO Actuation
T-H-140-3A/B	Temperature at outlet of process HEPA/Inlet to GAC beds (Average)	<130 C
T-H-140-3A/B	Temperature at outlet of process HEPA/Inlet to GAC beds (Average)	>175 C
T-H-140-2	Temperature at inlet to process HEPA pre-filter inlet	<130 C
PD-H-140-4A/B/C/D	Process HEPA pre-filter differential pressure (any)	>8 inches WC
P-H-140-8	HEPA filter inlet rupture disk pressure	>2.5 PSIG
T-H-141-7A/B	GAC outlet temperature (both)	>200 C
P-H-141-7A	GAC bed A rupture disk pressure	>0.5 PSIG
P-H-141-7B	GAC bed B rupture disk pressure	>0.5 PSIG
I-H-240-10A/B	Process exhaust blowers current (both)	<35 amps (after 10 second delay)
L-E-121-5	N2 Tank Level	<25 inches
P-B-357-2A/2B	Loss of N2 (both)	<80 PSIG
P-B-146-3A/3B	Loss of O2 (both)	<75 PSIG
L-E-124-5	O2 Tank Level	<30 inches
A-H-941-3A/B	CO concentration Hourly rolling ave 2 instruments	> 100 PPM
JS-B-120-1	PDC power loss	NA
P-B-166-2A/B	Loss of compressed air pressure (both)	<70 PSIG
XSH023-1CXSH023-2C	Seismic event (both)	NA

Additionally for Section D – Deleted Appendix D-5 and renumbered Section D appendices accordingly.

- Updated plot plans, exhibits, drawings, to reflect current configurations

Part A – photos of IWTU (pages 6p through 6u) were added that had not been included in previous permit submittals

Section B, Exhibits B-2, B-3, B-4, and B-5 were revised to reflect current INTEC conditions

Section G, Exhibits G-1 through G-4 were revised to reflect current conditions/staging areas for CPP-604

Drawings in Appendix II and III were updated to reflect the most current versions of drawings that are available on EDMS

Attachment 4 – Section F-2 Inspections Appendix F-1 Inspection Forms – provided updated inspection forms as found in EDMS as applicable

Provided Appendix VIII – Other Required information which includes: Completeness Evaluation Checklist, Section E – Ground Water Monitoring, Section J – Corrective Action for SWMUs, Section K – Other Federal Laws, and Section L – Certification

- Removed CPP-601 information since it is now covered in the Post-Closure Permit

General deletion of CPP-601 information throughout the document and deleted Attachment 8A Closure for the CPP-601 Deep Tanks (Phase 2, Phase 1, SPR-185 Sampling Procedure)

- Removed the CPP-604 Embedded Lines Design Package since the project has been completed

Deleted Appendix I and renumbered Appendices accordingly.

- Deleted the 3 hydrostatic analyses from the appendices as they were based on the old floodplain determination, with the BOR determination that the unit are located out of the floodplain the analyses are no longer required

Deleted old Appendix VI, VII, and VIII and Appendices were renumbered accordingly

- The OUO/CBI information was reviewed, and the amount reduced, and was consolidated in a single appendix.

OUO/CBI information is now found in new Appendix VII