FACT SHEET
HMWA/RCRA DRAFT PARTIAL CLOSURE PLAN
CPP-648 RADIOACTIVE SOLIDS AND LIQUID WASTE STORAGE
TANK SYSTEM (VES-SFE-106)
AT THE IDAHO NUCLEAR TECHNOLOGY AND ENGINEERING CENTER
AT THE
IDAHO NATIONAL LABORATORY
EPA ID NO. ID4890008952

This fact sheet sets forth the principal facts pertaining to the Draft Partial Closure Plan that the Idaho Department of Environmental Quality (DEQ) is proposing to approve. The Draft Partial Closure Plan sets forth the applicable closure requirements that DEQ intends to require of the United States Department of Energy (DOE) associated with the CPP-648 Radioactive Solid and Liquid Waste Storage Tank System.

This fact sheet was prepared in accordance with the requirements of the *Rules, and Standards for Hazardous Waste*, IDAPA § 58.01.05.000 et seq., specifically, IDAPA § 58.01.05.009 [40 CFR § 265.112(d) (4)].

A. PURPOSE OF THE DRAFT PARTIAL CLOSURE PLAN

Draft Partial Closure Plans designate specific administrative and procedural requirements the owner/operator must comply with, in accordance with the Idaho Hazardous Waste Management Act (HWMA) of 1983, as amended. DEQ reviewed and proposes to approve the plan to close the CPP-648 Radioactive Solid and Liquid Waste Storage Tank System at the Idaho Nuclear Technology and Engineering Center (INTEC) located on the Idaho National Laboratory (INL).

B. PROCEDURES FOR REACHING A FINAL DECISION

IDAPA § 58.01.05.009 [40 CFR § 265.112(d) (4)] requires that the public be given thirty (30) calendar days to comment on the Draft Partial Closure Plan presented for approval under the HWMA. The comment period will begin on April 15, 2005 and will end on May 16, 2005. Any person interested in commenting on this plan must do so within this thirty (30) -day comment period.

In response to specific requests and at the discretion of the Director of DEQ, a public hearing may be provided whenever such a hearing might clarify one or more issues concerning the Draft Partial Closure Plan. Written requests for a hearing may be submitted personally, or sent to the address below, and must be received on or before May 16, 2005.

All persons wishing to comment on the Draft Partial Closure Plan's conditions should submit comments in writing to:

Mr. Robert Bullock
c/o Ms. Teri Gregory
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255
(208) 373-0502

CONTINUED ON NEXT PAGE

Comments should include all reasonable available references, factual grounds, and supporting material.

When making the final determination regarding this Draft Partial Closure Plan, DEQ will consider all written comments received during the public comment period; comments received during the public hearing (if held); the requirements of the hazardous waste regulations of IDAPA § 58.01.05.000 et seq.; and all other applicable federal, state, or local laws.

C. FACILITY/UNIT DESCRIPTION

The VES-SFE-106 Tank System was placed into service in 1972 and was used to store characteristically hazardous wastes that were generated as a result of spent nuclear fuel storage activities, including treatment of the basin water that provided radioactive shielding for the spent nuclear fuel. The CPP-603 fuel storage basin water was treated in the CPP-603 Basin Water Treatment System (BWTS), which circulated the water through ion exchange columns and sand filters and then back to the three storage basins. The waste generated by the BWTS was pumped to the VES-SFE-106 Tank for storage. This waste stream was further treated by a clarification process within Tank VES-SFE-106.

The VES-SFE-106 Tank is a 25,000-gallon tank constructed of Type 304 stainless steel. The tank is located below ground level in a concrete vault that includes a sump. The vault was lined in 1997 with a Hypalon material that covered the bottom and went 4foot 5 inches up the walls of the vault.

Solids were allowed to settle in the VES-SFE-106 Tank and were periodically removed and disposed. Liquids were transferred to the Process Equipment Waste Evaporator System (PEWE) for evaporative volume reduction. The tank currently holds an estimated 5,000-7,000 gallons of sludge.

D. CLOSURE ACTIVITIES

The CPP-648 Radioactive Solid and Liquid Waste Storage Tank System to be closed includes Tank VES-SFE-106, and associated ancillary piping and equipment that tie the tank system to the BWTS, the VES-SFE-126 waste collection tank, and the PEWE System. Piping and ancillary equipment within CPP-648 that managed or potentially managed hazardous waste will also be closed under this HWMA/RCRA Draft Partial Closure Plan. Discharge piping from the VES–SFE-106 Waste Tank to the PEWE System will be closed, to the point that it connects to the permitted system.

The CPP-648 Radioactive Solid and Liquid Waste Storage Tank System, ancillary equipment and associated piping are to be closed under HWMA/RCRA by removal of the VES-SFE-106 Tank and decontamination or removal of ancillary equipment and piping. Tank system components, undergoing HWMA/RCRA closure, will either be decontaminated to site specific action levels specified in the HWMA/RCRA Draft Partial Closure Plan or will be removed and disposed. Site-specific action levels were developed to provide specific criteria to demonstrate that the tanks, piping, and ancillary equipment are left in a state that is protective of human health and the environment.

The waste in VES–SFE-106 will be removed by fluidizing the sludge and transferring to containers where it will be treated with a grout and solidified. If the treated sludge is tested by TCLP and found to be a non-hazardous waste per RCRA, the container with the treated material will be transported to the INL Radioactive Waste Management Complex (RWMC) for disposal. If the treated waste fails to meet the Land Disposal Restriction (LDR) standard, the container will be sent to a permitted treatment, storage, and disposal facility (TSDF).

Soils associated with the CPP-648 are included within the boundaries of one of the established FFA/CO sites (Operable Unit 3-13 Group 2, CPP-11 and CPP-88) and will be subject to characterization under HWMA/RCRA closure, once removal of the CPP-648 structure is completed. Completion of the FFA/CO activities will not be a criterion for closure certification.

Included with the Draft Partial Closure Plan for the CPP-648 Radioactive Solid and Liquid Waste Storage Tank System is the Field Sampling Plan addressing the sampling and analysis effort to demonstrate that the closure activities have met the HWMA/RCRA closure performance standard (IDAPA § 58.01.05.009 [40 CFR § 265.11 and 265.197]).

A certification by a registered professional engineer will conclude closure activities to ensure that the unit meets the closure performance standards outlined in the plan.

E. CLOSURE SCHEDULE

Closure of the CPP-648 Radioactive Solid and Liquid Waste Storage Tank System will take longer than the 180-day timeframe. In accordance with the provisions of IDAPA § 58.01.05.009 [40 CFR § 265.113], an extension is being requested to ensure that data of adequate quality are collected, and to allow DOE to implement important safety precautions and adequately perform the closure activities. The complete closure of the CPP-648 Tank System is estimated to take 900 days from plan approval. As required in other approved plans of this length, the facility will be required to submit quarterly progress reports until the system is certified closed.

F. DRAFT PARTIAL CLOSURE PLAN ORGANIZATION

The Draft Partial Closure Plan is divided into eleven sections:

SECTION	***TITLE***
1	INTRODUCTION
2	FACILITY DESCRIPTION
3	CURRENT AND MAXIMUM WASTE INVENTORIES AND CHARACTERISTICS
4	CLOSURE PERFORMANCE STANDARDS
5	CLOSURE ACTIVITES
6	CLOSURE SCHEDULE
7	DRAFT PARTIAL CLOSURE PLAN AMENDMENTS
8	CERTIFICATION OF CLOSURE
9	COST AND LIABILITY REQUIREMENTS
10	REFERENCES
11	DRAWINGS