

**FACT SHEET**

**DRAFT HWMA/RCRA POST-CLOSURE PERMIT RENEWAL**  
**FOR THE**  
**IDAHO NUCLEAR TECHNOLOGY AND ENGINEERING CENTER**  
**ON THE**  
**IDAHO NATIONAL LABORATORY**  
**EPA ID No. ID4890008952**

This fact sheet sets forth the principle facts pertaining to a draft Facility Post-Closure Partial-Permit that the Idaho Department of Environmental Quality (Department) is proposing to approve. The Hazardous Waste Post-Closure Permit sets forth the applicable post-closure requirements the Department intends to require of the Department of Energy for two closed mixed waste (both chemically hazardous and radioactive) management units located at the Idaho Nuclear Technology and Engineering Center (INTEC) on the Idaho National Laboratory (INL).

This fact sheet was prepared in accordance with the requirements of the Idaho *Rules and Standards for Hazardous Waste*, IDAPA 58.01.05.000 *et seq.*, specifically, IDAPA 58.01.05.013 [40 CFR § 124.8].

**A. PURPOSE OF THE POST-CLOSURE PERMIT**

Post-Closure Permits 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. This draft post-closure permit is a partial permit because it addresses only two closed hazardous waste management units; the Waste Calcine Facility (WCF) and the combined Buildings CPP-601/627/640, rather than all the hazardous waste storage, treatment, and disposal units on the INL in accordance with IDAPA 58.01.05.012 [40 CFR § 270.1(c)(4)].

The Department has reviewed the Post-Closure Permit Renewal Application submitted by DOE and their contract operator, CH2M-WG Idaho, LLC (CWI), and prepared the draft post-closure permit that is the subject of this fact sheet.

**B. PROCEDURES FOR REACHING A FINAL DECISION**

IDAPA 58.01.05.013 [40 CFR § 124.10(b)(1)] requires that the public be given forty five (45) calendar days to comment on the draft Post-Closure Permit Renewal presented for approval under the HWMA. The comment period will begin on December 16, 2013 and will end at 5:00 p.m. on January 30, 2014. Any person interested in commenting must do so within this 45-calendar day comment period.

Reasonable limits may be set on time allowed for oral statements and the submission of statements may be required. The meeting site will be accessible to the physically disabled.

All persons wishing to comment on any of the Post-Closure Partial Permit Renewal Conditions should submit their comments in writing to:

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

Comments may also be submitted through the comment form on the DEQ website at [www.deq.idaho.gov/public-comment-opportunities](http://www.deq.idaho.gov/public-comment-opportunities). Comments should include all reasonable available references, factual grounds, and supporting material.

Opportunity for a public hearing may be provided if signed, written requests for a hearing are submitted personally, or are addressed to the aforementioned and received at or before 5:00 p.m. MST, January 30, 2014. The request for a hearing must identify the nature of the issues to be raised at the hearing. If sufficient public interest is expressed in holding a public hearing, then a formal public hearing will be held.

When making the final determination regarding the approval of this Post-Closure Permit Renewal, the Department will consider all written comments received during the public comment period, those received during a public hearing, if one is 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 DESCRIPTIONS**

Both closed waste management units are located within the INTEC perimeter fence on the INL:

- The WCF was used to calcine and evaporate aqueous wastes generated from reprocessing spent nuclear fuel. The waste calciner operated from 1963 through 1981 and the evaporator system operated from 1983 until 1987. The WCF was closed under a DEQ approved closure plan. The WCF was closed with waste in place (landfill closure). DEQ approved the Closure Certification on November 2, 1999.
- CPP-601/627/640 unit was part of the spent nuclear fuel reprocessing complex at INTEC, which was used to recover enriched uranium for re-use. The unit started uranium processing in the mid-1950's and ceased in 1992. CPP-601/627/640 was closed with hazardous waste in place under an approved HWMA/RCRA closure plan. CPP-601/627/640 was covered by a low permeability concrete cap and earthen cover. DEQ approved the Closure Certification on February 19, 2010.

Both closed units are subject to HWMA post-closure permitting requirements.

#### **D. SUMMARY OF PERMIT REQUIREMENTS**

The draft partial permit requires:

1. The owner/operator must inspect and maintain the low permeability concrete cap, earthen cover, fencing, warning signs and other equipment/materials associated with these units;
2. Monitoring of the ground water in the vicinity of the WCF and CPP-601/627/640. Detection and compliance monitoring requirements are set forth in the draft permit while any required corrective action will be conducted under the December 4, 1991 Federal Facility Agreement/Consent Order (FFA/CO) between DOE, the U.S. Environmental Protection Agency and the State of Idaho. Upon completion of any corrective action, the permit requires resumption of the compliance monitoring program. To the extent possible, the HWMA monitoring requirements will be integrated with the monitoring conducted for the FFACO; and,
3. Demonstrating that the ground water samples are representative of the perched aquifer.
4. The Draft Permit includes a Contingent Snake River Plain Aquifer (SRPA) Monitoring Program. The contingent monitoring program is being established because one goal of the CERCLA remediation at INTEC is to dewater the perched zones to minimize contaminant mobility. Should declining perched zone water levels make it impossible to obtain the required perched zone ground water monitoring samples, ground water monitoring will need to be conducted in the deeper SRPA. The contingent monitoring program ensures that monitoring of the post-closure units will be conducted in a timely fashion.
5. The draft permit continues the previously granted Waiver for the Preparedness and Prevention. The WCF and CPP-601/627/640 consist of concrete monoliths where the typical emergency plan scenarios are not reasonable. Further, the units are included in the INTEC-wide emergency plan. Therefore, DEQ is proposing to continue to accept the applicant's request for a waiver, submitted in accordance with IDAPA 58.01.05.012 [40 CFR § 270.28], from the requirement to have a specific post-closure preparedness and prevention plan.

**E. POST-CLOSURE PERMIT ORGANIZATION**

The Post-Closure Permit is divided into five (5) sections with five (5) Attachments as follows.

<b>MODULE</b>	<b>TITLE</b>
I	Standard Permit Conditions
II	General Facility Conditions
III	Groundwater Monitoring Program
IV	Post-Closure Care
V	Corrective Action

<b>Attachments</b>	<b>Topic</b>
1	Facility Description and RCRA Part A Application
2	Post-Closure Operation, Inspection, and Maintenance Plans
3	Post-Closure Plan including Ground Water Sampling and Analysis Procedures
4	Permit Modification Log
5	Well construction Diagrams