

**ATTACHMENT 4 PERMIT MODIFICATION LOG and
PAGE CHANGE OUT LIST, consisting
of:**

- Attachment 4 shall be used to track the current revision of the permit, including attachments. The permit modification log shall record each permit modification, the portion of the permit affected, the date the modification was posted to the permit, and either a reference to a page change-out sheet, or if fewer than three pages of an attachment are revised a list of the page changes.

**HWMA/RCRA INTEC POST-CLOSURE PERMIT
FOR THE
IDAHO NATIONAL LABORATORY**

**Volume 21
Waste Calcining Facility and CPP-601/627/640**

**Attachment 4
Permit Modification Log**

Revision Date: August 25, 2011

PERMIT MODIFICATION TRACKING LOG

PERMIT MODIFICATION REQUEST (PMR) NUMBER	DATE PMR SUBMITTED TO DEQ	DATE PMR APPROVED BY DEQ	PMR CLASS	SUMMARY OF CHANGES REQUESTED IN THE PMR	PORTION OF THE PERMIT &/OR ATTACHMENTS AFFECTED BY THE PMR
1	10/30/2003	11/7/2003	1*	<ul style="list-style-type: none"> - Changing the methods of analyses for hydrazine and formaldehyde - Changing the detection limits for hydrazine - Deleting redundant language on the wording for purge water disposition - Updating the Inspection Form for Facilities Stormwater Pollution Prevention Plan for Industrial Activities <p style="text-align: center;">N/A</p>	<ul style="list-style-type: none"> - Permit Module III, page 30 of 42 - Permit Module III, page 31 of 42 - Permit Module III, page 30 of 42 - Attachment II, Inspection Forms: Inspection Form for Facilities Storm Waste Pollution Prevention Plan for Industrial Activities, Form 450.24, 1/30/2003, Rev. 04. - Permit – List of Attachments, Page 7 of 42, revised to reflect informational changes as approved in the PMR.

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2	5/21/2004	6/10/2004	1*	<ul style="list-style-type: none"> - Revising Table 2 in Permit Module III to reflect correct nomenclature of existing monitoring wells - Clarifying Permit Condition III.E.2. to reflect that annual monitoring well depths will not be required for wells that have dedicated downhole equipment - Revising Table 3 of Permit Module III for the Estimated Quantitation Limit for formaldehyde - Deleting Storm Water Information that is no longer applicable to the Permitted Facility - Revising the wording to accurately reflect the field inspection conditions for Maintenance Implementation and Tracking 	<ul style="list-style-type: none"> - Permit Module III, Table 2, page 28 of 42 - Permit Module III, Permit Condition III.E.2., page 30 of 42 - Permit Module III, Table 3, page 31 of 42 - Attachment 2, Sections D.3 Storm Water Drainage System, E.2 Maintenance of the Storm Water System and Appendix 2 Inspections Forms - Attachment 2, Section E.3.1 Maintenance and Implementation and Section E.3.2 Maintenance Tracking

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<p>2 (continued)</p>	<p>5/21/2004</p>	<p>6/10/2004</p>	<p>1*</p>	<ul style="list-style-type: none"> - Revising the wording to reflect the correct purging and sampling operations - Revising the wording to clarify when equipment rinsate samples will be collected for perched groundwater monitoring sampling events. - Other editorial/informational changes 	<ul style="list-style-type: none"> - Attachment 3, Section J.5.2.3 Perched Groundwater Sample Collection - Attachment 3, Section J.5.2.4 QA/QC Samples and Table J-5 QA/QC Samples for Perched Groundwater Sampling - Permit Condition III.H.6, page 35 of 42, Permit Condition IV.C.3 page 39 of 42, and Permit Condition V.A., page 42 of 42 - WCF HWMA/RCRA Well Inspection Checklist Form

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3	4/19/2005	4/26/2005	1*	<ul style="list-style-type: none"> - Transfer of Operational Control from Bechtel BWXT Idaho, LLC. to CH2M-WG Idaho, LLC. with an effective transfer date of May 1, 2005. 	<ul style="list-style-type: none"> - Permit – List of Attachments; pages 6, 7, and 9 of 42 - Attachment 1 – Part A Permit Application for Volume 21 Post-Closure Permit; pages 1 through 6 of EPA Form 8700-23 (OMB #: 2050-0034) and pages 1 through 3 of EPA Form 8700-23 (OMB #: 2050-0175)
4	11/14/2005	1/17/2006	2	<ul style="list-style-type: none"> - Revising Table 2 in Permit Module III to add wells ICPP-2018, ICPP-2019, and MW-10-2 as monitoring wells. - Changing well CPP-55-06 from a water elevation well to a monitoring well. - Removing well MW-4-2 as a water elevation well. - Revising Map 1 in Attachment 1 to show the locations of the wells. 	<ul style="list-style-type: none"> - Permit Module III, Table 2, page 28 of 41 - Permit Module III, Table 2, page 28 of 41 - Permit Module III, Table 2, page 28 of 41 - Attachment 1, Section I. Topographic Map

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<p>4 (continued)</p>	<p>11/14/2005</p>	<p>1/17/2006</p>	<p>2</p>	<ul style="list-style-type: none"> - Changing groundwater sampling and analysis procedures and monitoring schedule to allow quarterly monitoring of the groundwater network, including these new wells to continue longer than the initial two-year period specified in the permit. - Removing Permit Conditions II.H., III.B.1., III.F.1., III.I.1., III.I.2., and III.I.3. that were applicable during the first two years after permit issuance, have been fulfilled, and are no longer applicable. - Making other information and administrative changes: - Permit Condition I.P.4. was updated with new INTEC WCF point of contact information. 	<ul style="list-style-type: none"> - Permit Module III, page 29 of 41 - Permit Modules II and III, pages 24, 27, 30, and 35 of 41 - Permit Conditions I.P.4., page 17 of 41

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<p>4 (continued)</p>	<p>11/14/2005</p>	<p>1/17/2006</p>	<p>2</p>	<ul style="list-style-type: none"> - Permit Condition I.Z. submittal of the biennial report to the DEQ occurs by March 1 of each even numbered year, not March 31. - Permit Condition III.D.6. was changed to state that the current versions of the specified analytical methods will be used. - The identification number of the Waste Acceptance Criteria for the ICDF Evaporation Pond referenced in Permit Condition III.D.8. was changed from DOE/ID 10866 to DOE/ID 10881 to reflect an update of this document. - Permit Condition III.F.1. was changed to identify that Table 3 lists the constituents of concern. - Change from INEEL to INL and repagination of permit. 	<ul style="list-style-type: none"> - Permit Condition I.Z., page 21 of 41 - Permit Condition III.D.6., page 29 of 41 - Permit Condition III.D.8., page 30 of 41 - Permit Condition III.F.1., page 30 of 41 - Pages 1 through 41 of permit and pages 1 through 5 of Attachment 4

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<p>5</p>	<p>March 1, 2007</p>	<p>June 26, 2007</p>	<p>3</p>	<ul style="list-style-type: none"> - Modification of the EQL and/or GPS concentrations found in Table 3 of the Permit after background concentrations have been established and approved by the DEQ - Reduce the number of analytes that are sample/analyzed and establish DMLs for the remaining constituents found in Table 3 of the Permit - Revise Table 2 of the Permit to reduce the number of monitoring wells that are sampled/analyzed - Revise the permit to incorporate DEQs approval of the calculation of WCF water quality background data, submitted to the DEQ on December 11, 2006 and approved by the DEQ on January 29, 2007. 	<ul style="list-style-type: none"> - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions

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<p>5 (continued)</p>	<p>March 1, 2007</p>	<p>June 26, 2007</p>	<p>3</p>	<ul style="list-style-type: none"> - Revise the permit reflect SW-846 Methods to be used to analyze groundwater samples required by this permit. - Provide reporting requirement clarification - Revise the permit to remove permit conditions that have been completed and approved by the Director. - Revise/update the permit attachments to reflect current figures, forms, maps, and facility information - Revise the permit to provide new Floodplain information 	<ul style="list-style-type: none"> - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions

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5 (continued)	March 1, 2007	June 26, 2007	3	<ul style="list-style-type: none"> - Update security information to reflect current operations at the INL and to be consistent with other INTEC HWMA/RCRA permits - Update Groundwater Monitoring Data to reflect current information on groundwater monitoring wells, etc. at the INTEC - Provide other informational/ administrative changes as necessary and reformat and repaginate the entire Volume 21 Permit. 	<ul style="list-style-type: none"> - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions

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<p>6</p>	<p>May 31, 2011</p>	<p>August 25, 2011</p>	<p>2</p>	<ul style="list-style-type: none"> - Addition of the CPP-601/627/640 Landfill unit, currently operating under an approved Post-Closure Plan, to this post-closure permit - Update the Detection Monitoring Limits in Table 3b for the WCF based on additional statistical analyses completed in August 2010 - Revise/update the permit attachments to reflect current figures, forms, maps, and facility information - Update Groundwater Monitoring Wells and Data to reflect current information on groundwater monitoring wells, etc. at the INTEC - Addition of Attachment 5. Attachment 5 presents the INTEC Monitoring Well Map and the INTEC Monitoring Well Construction Diagrams - Provide other informational/administrative changes as necessary and reformat and repaginate the entire Volume 21 Permit. 	<ul style="list-style-type: none"> - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions - Permit – List of Attachments and Attachment 5. - Entire permit/attachments revised as applicable and reformatted to reflect approved revisions