

**Permittee: Department of Energy (DOE) and DOE-Designated Contractors, Idaho National Engineering and Environmental Laboratory  
Argonne National Laboratory-West Partial Permit Number: EPA ID# ID4890008952**

## **INTRODUCTION AND SIGNATURE PAGE**

Pursuant to the Idaho Hazardous Waste Management Act of 1983 (HWMA), Idaho Code §§ 39-4401 *et seq.*, and the “*Rules, and Standards For Hazardous Waste,*” as amended, IDAPA 58.01.05.000 *et seq.*, specifically IDAPA 58.01.05.012 [40 CFR § 270.1(c)(4)], a Partial Permit (for less than the entire facility) is hereby issued to the United States Department of Energy (DOE) and DOE-designated contractor (see Permit Definitions), hereinafter called the Permittee, at the Idaho National Engineering and Environmental Laboratory (INEEL), to operate a hazardous waste treatment and storage facility at Argonne National Laboratory - West, located in Bingham County, Idaho.

The Permittee shall comply with all of the terms and conditions of this Partial Permit (Permit) and Attachments 1 through 9 of this Permit. The Permittee shall comply with all applicable state regulations, including IDAPA 58.01.05.004 through 58.01.05.013 [40 Code of Federal Regulations (CFR), Parts 124, 260 through 266, 268, and 270], and as specified in this Permit.

Applicable state regulations are those which are in effect on the date of final administrative disposition of this Permit and any self-implementing statutory provisions and related regulations which, according to the requirements of the Hazardous and Solid Waste Amendments (HSWA), are automatically applicable to the Permittee’s hazardous waste management activities, notwithstanding the conditions of this Permit.

This Permit is based upon the administrative record, as required by IDAPA 58.01.05.013 [40 CFR § 124.9]. The Permittee’s failure, in the application or during the permit issuance process, to fully disclose all relevant facts, or the Permittee’s misrepresentation of any relevant facts, at anytime, shall be grounds for the termination or modification of this Permit and/or initiation of an enforcement action, including criminal proceedings. To the extent there are inconsistencies between the Permit and the attachments the language of the permit shall prevail. The Permittee must inform the Director of the Idaho Department of Environmental Quality (hereinafter referred to as “Director”) of any deviation from the permit conditions or changes in the information on which the application is based, which would affect the Permittee’s ability to comply or actual compliance with the applicable regulations or permit conditions, or which alters any permit condition in any way. The Director shall enforce all conditions of this Permit, which are designated in this Permit as state requirements. Any challenges of any permit condition that concern requirements shall be appealed to the Director, in accordance with IDAPA 58.01.05.996 and the Idaho Department of Environmental Quality Rules and Regulations 58.05.03.000 *et seq.*, “Rules Governing Contested Cases and Declaratory Rulings.”

The United States Environmental Protection Agency (EPA) shall maintain an oversight role of the state-authorized program and in such capacity, shall enforce any permit condition based on state requirements if, in the EPA’s judgment, the Director should fail to enforce that permit condition. Any challenges to the EPA-enforced conditions shall be appealed to the EPA, in accordance with 40 CFR § 124.19.

This Permit is effective as of **August 16, 2004** and shall remain in effect until **August 16, 2014** unless, in accordance with IDAPA 58.01.05.012, the Permit is revoked and reissued [40 CFR § 270.41], modified [40 CFR § 270.42, Appendix I.A.6], terminated [40 CFR § 270.43], or continued [40 CFR § 270.51].

July 15, 2004  
Date

Toni Hardesty, Director  
Idaho Department of Environmental Quality

**Amendment Number 1 to the Introduction and Signature Page**

The Introduction and signature Page is amended as follows:

1. Where it reads: "Idaho National Engineering and Environmental Laboratory" it is deleted and replaced with "Idaho National Laboratory"
2. Where it reads: "Argonne National Laboratory West" it is deleted and replaced with "Materials and Fuels Complex"
3. Where it reads: "Idaho National Engineering and Environmental Laboratory (INEEL)" it is deleted and replaced with "Idaho National Laboratory (INL)"

All other terms and conditions in the Introduction and Signature Page remain unchanged

Date: January 5, 2007

Signature  
Brian Monson

INL SPF/SSS PARTIAL PERMIT  
PERMIT NUMBER: ID4890008952  
EFFECTIVE DATE: August 16, 2004  
MODIFICATION DATE: December 5, 2012  
AMENDMENT 2, PAGE 3 of 41

**Amendment Number 2 to the MFC SPF/SSS Partial Permit**

The DOE document number for this SPF/SSS HWMA/RCRA Partial Permit is:

Doc. No. PER-140

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### LIST OF ATTACHMENTS

The following attachment list includes excerpts from documents that are part of the Permittee's Administrative Record; i.e., HWMA/RCRA Permit Application for the MFC HWMA Units: Contaminated Equipment Storage Building (CESB), Hot Fuel Examination Facility (HFEF), Radioactive Scrap and Waste Facility (RSWF), Sodium Components Maintenance Shop (SCMS), Sodium Process Facility (SPF), and Sodium Storage Building (SSB), Books 1 and 2; HWMA/RCRA Permit Application for the Experimental Breeder Reactor-II (EBR-II) Complex; supplemental reports, and other documents contained in the Department's supporting file for the draft Permit. The Director, as deemed necessary, modified specific language in the Attachments. These modifications are described in the permit conditions (Modules I through VI) and, thereby, supersede the language of the original attachment. If the language of the Permit conflicts with either the attachments or the original application, the language in the Permit shall prevail. These incorporated attachments are enforceable conditions of this Permit, as modified by the specific permit condition(s).

**ATTACHMENT 1** FACILITY DESCRIPTION, consisting of:

INL Part A Permit Application for SPF and SSS piping/components,

INL FACILITY DESCRIPTION, Section B, HWMA/RCRA Permit Application Volume 3, Section B, most recent revision

MFC FACILITY DESCRIPTION, Section B, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components

Attachment B-1: Schematic Showing MFC Administrative Boundaries; Attachment B-2: MFC Plot Plan: Location of HWMA Units, Process Codes, and Transfer Routes Between MFC HWMA Units and Off-site Attachment B-3: SPF Floor Plan Schematic Showing Facility Arrangement and Maximum Storage Capacity; Attachment B-4: Geological Map of Idaho; Attachment B-5: SSS piping/components.

PROCESS DESCRIPTION, Section D, Materials and Fuels Complex Part B Permit for SPF.

**ATTACHMENT 1a** FACILITY DESCRIPTION, consisting of:

PROCESS DESCRIPTION, Section D, Materials and Fuels Complex Part B Permit for SSS piping/components.

**ATTACHMENT 2** WASTE ANALYSIS PLAN

Section C, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components.

**ATTACHMENT 3** SECURITY

Section F, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components, Subsection F-1, Appendix F-1.

**ATTACHMENT 4**      INSPECTIONS

Section F, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components, Subsection F-2, Appendices F-2 and F-3.

**ATTACHMENT 5**      PERSONNEL TRAINING:

Section H, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components,.

**ATTACHMENT 6**      PROCEDURES TO PREVENT HAZARDS

Section F, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components, Subsections F-3 through F-5.

**ATTACHMENT 7**      CONTINGENCY PLAN

Section G, Materials and Fuels Complex Part B Permit for SPF and SSS piping/components,

**ATTACHMENT 8**      CLOSURE PLANS

Section I, Material and Fuels Complex Part B Permit for SPF and SSS piping/components.

**ATTACHMENT 9**      PERMIT REVISION LOGS

With revisions approved through December 5, 2012

## DEFINITIONS

For purposes of this Permit, the following definitions shall apply:

- a. "Application" shall mean the following:  
  
Books 1 and 2 of the July 2003 Hazardous Waste Management Act (HWMA)/Resource Conservation Recovery Act (RCRA) Permit Application for the Materials and Fuels Complex (MFC) HWMA Units: Contaminated Equipment Storage Building, Hot Fuel Examination Facility, Radioactive Scrap and Waste Facility, Sodium Components Maintenance Shop, Sodium Process Facility, and the Sodium Storage Building; and Volume 16, Books 6 and 7 of the October 2006 INL HWMA/RCRA Permit Application.
- b. "Co-Operator" shall mean both Department of Energy (DOE) and the DOE-designated contractor (as found on the signature page of each partial permit application).
- c. "Days" shall mean calendar day(s) unless otherwise specified. Any requirement of submittal under the terms of this Permit that would be due on a Saturday, Sunday, or a state or federal holiday shall be due on the following business day."
- d. "Department" shall mean the Idaho Department of Environmental Quality (IDEQ).
- e. "Director" shall mean either the Director of IDEQ, the Director's designee, or authorized representative.
- f. "Discovery (discovered)" shall mean the initial identification of a Solid Waste Management Unit (SWMU) or other Area of Concern, which has the potential to release hazardous waste or hazardous waste constituents to the environment.
- g. "DOE" shall mean the United States Department of Energy.
- h. "Facility" shall mean all contiguous land, structures, other appurtenances, and improvements under the control of the DOE at the Idaho National Laboratory (INL) for total of approximately 890 square miles or 601,260 acres
- i. "HSWA" shall mean the Hazardous and Solid Waste Amendment of 1984.
- j. "HWMA" shall mean the State of Idaho, Hazardous Waste Management Act of 1983, as amended, Idaho Code § 39-4401 et seq.
- k. "Hazardous Waste" shall mean a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, or chemical, or infectious characteristics may cause or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed [See 42 United States Code (USC) § 6903(5)].

- l. "Hazardous Waste Constituent" shall mean any constituent identified in Appendix VIII of IDAPA 58.01.05.005 [40 CFR Part 261], or any constituent identified in Appendix IX of IDAPA 58.01.05.008 [40 CFR Part 264].
- m. "Hazardous Waste Management Unit (HWMU)" shall mean those operable units subject to the requirements of IDAPA 58.01.05.012 [40 CFR § 270.14 through .25].
- n. "Mixed Waste" shall mean waste that is both hazardous and radioactive.
- o. "Off-Site HW/MW" shall mean hazardous/mixed wastes generated or owned by non MFC or INL generators/owners. This is HW/MW non-INL facilities have generated or will generate.
- p. "MFC HW/MW" shall mean hazardous/mixed wastes generated from MFC. This is HW/MW MFC facilities have or will generate as a result of ongoing MFC operations and cleanup or HW/MW for which MFC has assumed ownership, such as legacy waste.
- q. "INL HW/MW" shall mean hazardous/mixed wastes generated from INL. This is HW/MW INL facilities have or will generate as a result of on-going MFC operations and cleanup or HW/MW for which INL has assumed ownership, such as legacy waste.
- r. "Operator" shall mean the DOE-designated contractor that has responsibilities and control of the HWMU. The present operator of the SPF and SSS piping/components at the MFC is CH2M-WG Idaho, LLC.
- s. "Owner" shall mean the United States Department of Energy (DOE).
- t. "Permittee" shall mean both DOE and the DOE-designated contractor.
- u. "RCRA" shall mean the Resource Conservation and Recovery Act of 1976, as amended by HWSA in 1984.
- v. "Release" shall mean any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous waste constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous waste constituents).
- w. "Solid Waste Management Unit" (SWMU) shall mean any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous wastes. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

All definitions contained in IDAPA 58.01.05.004, .005, .008, and .010 through .013 [40 CFR Parts 260, 261, 264, 266, 268, 270, and 124] are hereby incorporated, in their entirety, by reference into this Permit, except that any of the definitions used above shall supersede any definition of the same term given in IDAPA 58.01.05.000 et seq. Where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

## ACRONYMS AND ABBREVIATIONS

AL	Analytical Laboratory
ALARA	As Low As Reasonably Achievable
ALESC	Analytical Laboratory Environmental Sample Custodian
AL NMCM	Analytical Laboratory Nuclear Material Characterization Manager
AMWTF	Advanced Mixed Waste Treatment Facility
ANL-E	Argonne National Laboratory - East
ASTM	American Society for Testing and Materials
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CESB	Contaminated Equipment Storage Building
CFA	Central Facilities Area
CFR	Code of Federal Regulations
CH-TRU	Contact Handled Transuranic (elements)
CME	Corrective Measures Evaluation
CMi	Corrective Measures Implementation
CMS	Corrective Measures Study
COCA	Consent Order Compliance Agreement
CPA	Carbonate Process Area
DC	Decontamination Cell/Spray Chamber
DOE	Department of Energy
DOE-ID	Department of Energy - Idaho Falls Operations Office
DOT	Department of Transportation
EBR-II	Experimental Breeder Reactor-II
ECC	Emergency Command Center
EDMS	Electronic Document Management System
EOC	Emergency Operations Center
EPA	U.S. Environmental Protection Agency
EQL	Estimated Quantitation Limit
ERO	Emergency Response Organization
ES&H	Environment, Safety, and Health
EWM	Environment and Waste Management
'	feet or minutes
FCF	Fuel Conditioning Facility
FFA/CO	Federal Facilities Agreement/Consent Order
FR	Federal Register
HBA	High Bay Area
HEPA	High-Efficiency Particulate Air
HFEF	Hot Fuel Examination Facility
HP	Health Physics (or health physicist)
HPT	Health Physics Technician
HRA	Hot Repair Area
HSWA	Hazardous and Solid Waste Amendments of 1984
HWC	Hazardous Waste Code
HWMA	Hazardous Waste Management Act of 1983, as amended
HWMU	Hazardous Waste Management Unit
HW/MW	Hazardous Waste/Mixed Waste
HWN	Hazardous Waste Number
IDAPA	Idaho Administrative Procedures Act

IDEQ	Idaho Department of Environmental Quality
INL	Idaho National Laboratory [used after 2/2005]
INTEC	Idaho Nuclear Technology and Engineering Center
"	inch(es) or seconds
I&C	Instrument and Control
IRT	Incident Response Team
IWTS	Integrated Waste Tracking System
LDR	Land Disposal Restrictions
MCCE	Maintenance Characterization and Containment Enclosure
MDL	Method Detection Limit
MFC	Materials and Fuels Complex [new name used after 2/2005]
MSDS	Material Safety Data Sheet
No.	Number
NRC	Nuclear Regulatory Commission
NRF	Navel Reactors Facility
NFPA	National Fire Protection Association
OJT	On-the-Job Training
OSC	On-Scene Commander
OSHA	Occupational Safety and Health Administration
P&ID	Piping and Instrumentation Diagram
PCB	Polychlorinated Biphenyl
POTW	Publically-Owned Treatment Works
PPE	Personal Protective Equipment
PR	Preparation Room
PR/VSJ	Preliminary Review/Visual Site Inspection
QAPjP	Quality Assurance Project Plan
QC	Quality Control
RA	Radiological Assay
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RH	Remote Handled
RLWTF	Radioactive Liquid Waste Treatment Facility
RPD	Relative Percent Difference
RSSF	Radioactive Sodium Storage Facility
RSWF	Radioactive Scrap and Waste Facility
RTC	Reactor Technologies Complex
RWMC	Radioactive Waste Management Complex
RWP	Radiation Work Permit
SAA	Satellite Accumulation Area
SAP	Sampling and Analysis Plan
SARA	Superfund Amendments and Reauthorization Act of 1986
SCMS	Sodium Components Maintenance Shop
SHADE	Shielded Ho Air Drum Evaporator
SLSF	Sodium Loop Safety Facility
SNF	Spent Nuclear Fuel
SPA	Sodium Process Area
SPF	Sodium Process Facility
SSB	Sodium Storage Building

SSS	Secondary Sodium System
STP	Site Treatment Plan
SW-846	Test Methods for Evaluating Solid Waste: Physical/Chemical Methods
SWB	Standard Waste Box
SWMU	Solid Waste Management Unit
TAN	Test Area North
TCLP	Toxicity Characteristic Leaching Procedure
TFF	Tank Farm Facility
TID	Tamper-Indicating Device
TSDF	Treatment, Storage, and Disposal Facility
UBC	Uniform Building Code
USGS	United States Geological Survey
UTS	Universal Treatment Standards
WAC	Waste Acceptance Criteria
WAP	Waste Analysis Plan
WCC	Warning Communications Center
WIPP	Waste Isolation Pilot Project

## MODULE I - STANDARD PERMIT CONDITIONS

### I.A. EFFECT OF PERMIT

The Permittee is required to store and/or treat mixed/hazardous waste/debris in accordance with the conditions of this Partial Permit. Any storage or treatment of hazardous/mixed waste/debris in the Hazardous Waste Management Units (HWMU), described herein, not authorized in this Permit, is prohibited.

Pursuant to Idaho Administrative Procedures Act (IDAPA) 58.01.05.012 [40 Code of Federal Regulations (CFR) § 270.4], compliance with this Permit generally constitutes compliance, for purposes of enforcement, with the Idaho Hazardous Waste Management Act (HWMA), as amended, except for those requirements not included in this Permit, which become effective by statute or future regulatory changes to include those requirements promulgated under IDAPA 58.01.05.011 [40 CFR Part 268] restricting the placement of hazardous waste in or on the land. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations as specified in IDAPA 58.01.05.012 [40 CFR 270.4].

I.A.1. The Department of Energy (DOE) is the owner and is responsible for activities which include, but are not limited to, the overall management and operation of the facility.

I.A.2. The designated DOE Contractor is identified as a Permittee for any and all activities where their agents, employees, or subcontractors have operational responsibilities and control, including waste characterization and handling, monitoring, recordkeeping, reporting, and contingency planning.

### I.B. ENFORCEABILITY

The terms and conditions of this Permit are enforceable pursuant to the HWMA or any other applicable federal, state, or local law. Violations of this Permit may result in civil penalties, in accordance with the HWMA [Idaho Code § 39-4414] and the HWMA Civil Penalty Policy.

I.B.1. Any person who knowingly makes any false statement or representation in any application, label, manifest, record, report, permit, or other document filed, maintained or used, for the purposes of complying with the provisions of Idaho Code § 39-4415, shall be guilty of a misdemeanor and subject to a fine of not more than ten thousand dollars (\$10,000) or to imprisonment not to exceed one (1) year, or to both, for each separate violation or for each day of a continuing violation.

### I.C. OTHER AUTHORITY

The Department expressly reserves any right of entry provided by law, and any authority to order or perform emergency or other response activities as authorized by law.

I.D. PERMIT ACTIONS

- I.D.1. This Permit may be modified, revoked and reissued, or terminated for cause, as specified in IDAPA 58.01.05.012 [40 CFR §§ 270.41, 270.42, or 270.43].
- I.D.2. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.
- I.D.3. The Director may modify this Permit when the standards or regulations on which the Permit was based have been changed by statute, amended standards or regulations, or by judicial decision after the effective date of this Permit.
- I.D.4. Except as provided by specific language in this Permit or except for the Director's approval of a Class 1 or 2 Permit Modification, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42(a) and (b)], any modifications which substantially alter the facility or its operation (as covered by this Permit) shall be administered as a Class 3 Permit Modification prior to such change taking place, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42(c)].
- I.D.5. Within 45 days of a permit modification being put into effect or approved, the Permittee shall provide clean copies of the relevant portions of the Permit and Attachments to incorporate the change (if not already reflected/provided in the change pages submitted with the Permit Modification Request), reprint the documents (as necessary), and submit them to the Director.
- I.D.6. The Permittee shall ensure Attachment 9, "Modification Tracking Log" is current consistent with Permit Condition I.D.5.

I.E. SEVERABILITY

- I.E.1. The provisions of this Permit are severable, and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision, which forms the basis for any condition of this Permit, does not affect the validity of any other state or federal statutory or regulatory basis for said provision.
- I.E.2. In the event that a condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the related applicable and relevant permitted standards in IDAPA 58.01.05.008 [40 CFR Part 264] until final resolution of the stayed condition, unless compliance with the related applicable and relevant interim status standards would be technologically incompatible with compliance with other conditions of this Permit that have not been stayed.

I.F. DUTY TO COMPLY

- I.F.1 The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit issued in accordance with IDAPA 58.01.05.012 [40 CFR § 270.61]. Any permit noncompliance (other than noncompliance authorized by an emergency permit) constitutes a violation of HWMA, and is grounds for enforcement action, for permit termination, revocation and reissuance, or modification of the Permit, or denial of a permit renewal application.
- I.F.2. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under §§ 3007, 3008, 3013, or 7003 of RCRA [42 U.S.C. §§ 6927, 6928, 6934, and 6973], §§ 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 [42 U.S.C. §§ 9604, 9606(a), or 9607, commonly known as CERCLA], as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), or any other state or federal law providing for protection of public health or the environment from any imminent and substantial endangerment to human health or the environment.

I.G. DUTY TO REAPPLY

A minimum of one hundred eighty (180) calendar days prior to the expiration date of this Permit, if the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee shall submit a new application, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.10(h) and 270.30(b)].

I.H. PARTIAL PERMIT EXPIRATION

Except as renewed, modified, revoked, reissued, or terminated by the Department, this Permit shall automatically expire ten (10) years from the effective date of this Permit.

I.I. CONTINUATION OF EXPIRING PERMIT

This Permit and all conditions herein shall continue in force until the effective date of a new permit, if the Permittee has submitted a timely and complete application (in accordance with IDAPA 58.01.05.012 [40 CFR §§ 270.10, 270.13 through 270.29]) and through no fault of the Permittee, the Director has neither issued or denied a new permit under IDAPA 58.01.05.013 [40 CFR § 124.5] on or before the expiration date of this Permit.

I.J. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

It shall not be a defense for the Permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit as specified in IDAPA 58.01.05.012 [40 CFR 270.30(c)].

I.K. DUTY TO MITIGATE

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment resulting from the noncompliance, and shall carry out such measures as are reasonable, to prevent significant adverse impacts on human health or the environment in accordance with IDAPA 58.01.05.012 [40 CFR 270.30(d)].

I.L. PROPER OPERATION AND MAINTENANCE

The Permittee shall, at all times, properly operate and maintain all facilities and controls (and related appurtenances), which are installed or used by the Permittee, to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary equipment or similar systems, only when necessary, to achieve compliance with the conditions of this Permit in accordance with IDAPA 58.01.05.012 [40 CFR 270(e)].

I.M. DUTY TO PROVIDE INFORMATION

The Permittee shall furnish to the Department and/or the Director, within a reasonable time, any relevant information which the Department and/or the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Department and/or the Director, upon request, copies of records required to be kept by this Permit in accordance with IDAPA 58.01.05.012 [40 CFR 270(h)].

I.N. INSPECTION AND ENTRY

Pursuant to IDAPA 58.01.05.012 [40 CFR § 270.30(i)], the Permittee shall allow the Department, the Director, and/or their authorized officers, employees or representatives (upon the presentation of credentials and other documents), as may be required by law, to:

- I.N.1. Enter, at reasonable times, the Permittee's premises where a regulated facility or activity is located or conducted, or where records are kept as required by the conditions of this Permit;
- I.N.2. Have access to and copy, at reasonable times, any records that are kept as required by the conditions of this Permit;
- I.N.3. Inspect at reasonable times any portion of the facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- I.N.4. Sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the HWMA or RCRA, any substances or parameters at any location.

I.O. MONITORING AND RECORDS

- I.O.1 The Permittee shall retain copies of all reports required by this Permit, the certification required by IDAPA 58.01.05.008 and 012 [40 CFR § 264.73(b)(9) and 270.30 (j)(2)], and records of all data used to complete the application for this Permit for a period of at least three (3) years from the date of the report, record, or certification unless a longer retention period for certain information is required by other conditions of this Permit.
- I.O.2. The Permittee shall retain, at the facility, all monitoring records from all surface water sampling, seep sampling, soil sampling, sediment sampling, ground water monitoring wells, and associated ground water surface elevations until three (3) years past the end of the corrective action instituted to address releases of hazardous waste or hazardous waste constituents from any solid waste management unit. These periods may be extended by request of the Director, at any time, by written notification to the Permittee, and the retention times are automatically extended during the course of any unresolved enforcement action regarding this facility to three (3) years beyond the conclusion of the enforcement action.
- I.O.3. Pursuant to IDAPA 58.01.05.012 [40 CFR § 270.30(j)(3)], records of monitoring information shall specify the following:
- I.O.3.a. The date(s), exact place, and times of sampling or measurements;
- I.O.3.b. The name(s), title(s), and affiliation of individuals who performed the sampling or measurements;
- I.O.3.c. The date(s) analyses were performed;
- I.O.3.d. The name(s), title(s), and affiliation of individuals who performed the analyses;
- I.O.3e. The analytical techniques or methods used; and
- I.O.3.f. The results of such analyses, including the Quality Control/Quality Assurance summary.
- I.O.4. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity in accordance with IDAPA 58.01.05.012 [40 CFR 270.30(j)(1)]. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method from IDAPA 58.01.05.005 [40 CFR Part 261, Appendix I], or an equivalent method approved by the Director. Laboratory methods shall be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 (prevailing edition - hereinafter, referred to as SW-846), Standard Methods of Wastewater Analysis (prevailing edition), or other alternate methods approved in this Permit, or an equivalent method in accordance with Permit Condition I.O.5. of this Permit.

I.O.5. The Permittee may substitute analytical methods, which are equivalent or superior to those specifically approved for use in this Permit, in accordance with the following:

I.O.5.a. The Permittee submits to the Director a request for substitution of analytical method(s) specifically approved for use in this Permit. The request shall provide information demonstrating that the proposed method(s) requested to be substituted are equivalent or superior in terms of sensitivity, accuracy, and precision (i.e., reproducibility); and

I.O.5.b. The Permittee receives a written approval from the Director for the substitution of analytical method(s). Such approval shall not require a permit modification under IDAPA 58.01.05.012 [40 CFR § 270.42].

I.P. REPORTING PLANNED CHANGES

The Permittee shall give notice to the Director as soon as possible, but not to exceed sixty (60) calendar days prior to any planned physical alteration or additions to the permitted facility, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(I)(1)].

I.Q. REPORTING ANTICIPATED NONCOMPLIANCE

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity, which may result in noncompliance with requirements of this Permit, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(I)(2)]. Advance notice shall not constitute a defense for any noncompliance.

I.R. CERTIFICATION OF CONSTRUCTION OR MODIFICATION

I.R.1 The Permittee may not commence storage or treatment of hazardous/mixed waste/debris in a new permitted Hazardous Waste Management Unit or in a modified portion of an existing permitted Hazardous Waste Management Unit, except as provided in IDAPA 58.01.05.012 [40 CFR § 270.42], until the Permittee has submitted to the Director (by certified mail express mail, or hand delivery) a letter, along with the attachments required under Permit Condition II.A.2, signed by the Permittee and a registered professional engineer certifying that the permitted unit(s) at the facility have been constructed or modified in accordance with the approved plans and specifications in compliance with this Permit, IDAPA 58.01.05.012 [40 CFR § 270.30(I)]; and

I.R.2. The Director has reviewed and inspected (if deemed appropriate) the modified or newly constructed unit(s), and has notified the Permittee in writing that the unit(s) were found in compliance with the conditions of this Permit; or

I.R.3. If within fifteen (15) calendar days after the date of submission of the letter in Permit Condition I.R.1 of this Permit, the Permittee has not received notice from the Director of the intent to inspect, prior inspection is waived and the Permittee may commence storage of hazardous waste in the permitted unit(s) certified, in accordance with Permit Condition I.R.1 of this Permit.

I.S. TRANSFER OF PERMIT

This Permit shall be transferred to a new owner or operator only if it is modified or revoked and reissued, pursuant to IDAPA 58.01.05.012 [40 CFR § 270.40]. Prior to transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator, in writing, of the requirements of IDAPA 58.01.05.008 and 58.01.05.012 [40 CFR Parts 264 and 270] and this Permit.

I.T. TWENTY-FOUR-HOUR REPORTING

I.T.1. In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(I)(6)], the Permittee shall verbally report to the Director any noncompliance with this Permit that may endanger human health or the environment within twenty-four (24) hours from the time the Permittee becomes aware of such noncompliance, including:

I.T.1.a. Noncompliance with Permit Condition II.A.1 of this Permit; or

I.T.1.b. Information concerning a release of any hazardous waste that may endanger public drinking water supplies; or

I.T.1.c. A fire, explosion, or any unplanned sudden or non-sudden release of mixed or hazardous waste, mixed or hazardous waste constituents to air, soil or surface water at the HWMA unit that could threaten human health or the environment outside the facility.

I.T.2. The verbal description of the occurrence and its cause shall, at a minimum, include:

- Name, title, and telephone number of individual reporting;
- Name, address, and telephone number of the owner or operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident;
- Location and cause of the accident;
- Name and quantity of materials involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to the environment and human health, where this is applicable;
- Description of any emergency action taken to minimize possible threat(s) to human health and the environment;
- Estimated quantity and disposition of recovered material that resulted from the incident; and
- Any other information necessary to evaluate the situation and to develop an appropriate course of action.

I.T.3. Within five (5) calendar days after the Permittee is required to provide verbal notification, as specified in Permit Conditions I.T.1 and I.T.2 of this Permit, the Permittee shall provide to the Director a written submission. The written submission shall include, but not be limited to, the following:

- Name, address, and telephone number of individual reporting;
- A description (include cause, location, extent of injuries (if any), and an assessment of actual or potential hazard(s) to the environment and human health outside the facility (where this is applicable) of the incident (noncompliance and/or release);
- The period(s) in which the incident (noncompliance and/or release) occurred (including exact dates and times);
- Whether the results of the incident remain a threat to human health and the environment (whether the noncompliance has been corrected and/or the release has been adequately remediated); and
- If not, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance, and/or the steps taken or planned to adequately remediate the release.

I.T.4. The Permittee need not comply with the five (5) calendar-day, written notice requirement if the Director waives the requirement, and the Permittee submits a written report within fifteen (15) calendar days from the time the Permittee is required to provide verbal notification, as specified in Permit Condition I.T.1 of this Permit.

I.T.5. If the facility stops operations in response to a fire, explosion, or release, a report must be submitted within 15 days that includes the following information:

- Name, title, and telephone number of the individual submitting the report;
- Date, time and type of incident;
- Location and suspected cause of the incident;
- Name and quantity of materials involved, if any;
- Any leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment;
- All changes made to the operation of the facility to ensure that the event does not recur.

I.T.5.a. If the required information is provided electronically or verbally within 24 hours of the incident, DEQ, at its discretion, may provide a written waiver of this reporting requirement.

#### I.U. OTHER NONCOMPLIANCE

The Permittee shall report all other instances of noncompliance, not otherwise required to be reported in accordance with Permit Condition I.T of this Permit, on a semi-annual basis in accordance with IDAPA 58.01.05.012 [40 CFR 270.30(I)(10)]. Reports shall be due on February 1 and August 1 of each year. The reports shall contain the information listed in Permit Condition I.T of this Permit. Reporting shall not constitute a defense for any noncompliance.

I.V. OTHER INFORMATION

Whenever the Permittee becomes aware that any relevant information was omitted in the permit application or incorrectly submitted in the permit application or in any report to the Director, the Permittee shall promptly submit such facts or information to the Director, in accordance with Permit Condition I.W of this Permit and IDAPA 58.01.05.012 [40 CFR 270.30(i)(11)].

I.W. SIGNATORY REQUIREMENT

All applications, reports, or information requested by or submitted to the Director shall be signed and certified in accordance with IDAPA 58.01.05.012 [40 CFR §§ 270.11 and 270.30(k)] and submitted in accordance with Permit Condition I.Y.

I.X. CONFIDENTIAL INFORMATION

Pursuant to Title 9, Chapter 3, of the Idaho Code; IDAPA 58.01.05.012 [40 CFR § 270.12]; or any other applicable federal, state, or local law; the Permittee may assert a claim of confidentiality regarding any information required to be submitted pursuant to this Permit. The Department shall determine whether said information is exempt from disclosure, pursuant to applicable law.

I.Y. REPORTS, NOTIFICATIONS, AND SUBMISSIONS

All reports, notifications, or other submissions, which are required by this Permit and IDAPA 58.01.05.012 [40 CFR § 270.5], shall be sent or given to the Director in duplicate by certified mail, express mail, or hand delivered at:

Director c/o Hazardous Waste Program Manager  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706-1255  
Telephone No. (208) 373-0502

Twenty-four (24) hour telephone number 1-800-632-8000

The address and telephone numbers listed above are current as of the effective date of this Permit and may be subject to change.

I.Z. DOCUMENTS TO BE MAINTAINED BY THE PERMITTEE(S)

I.Z.1 The Permittee shall maintain, at the INL, the following documents as well as any/all amendments, revisions and/or modifications to these documents as follows:

I.Z.1.a. A complete copy of this Permit including attachments, tables and modifications, until closure is completed and certified by a registered, professional engineer.

I.Z.1.b. Operating Record, as required by IDAPA 58.01.05.008 [40 CFR § 264.73] and this Permit, until closure is completed and certified by a registered, professional engineer.

- I.Z.1.c. Inspection Procedures, Schedules, Logs, Records and Results for each HWMU of this Permit, as required by IDAPA 58.01.05.008 [40 CFR §§ 264.15(b)(2), 264.73(b)(5)] and this Permit, for a period of three years.
- I.Z.1.d. Personnel training requirements for each HWMU of this Permit, as required by IDAPA 58.01.05.008 [40 CFR § 264.16(d)] and this Permit, until closure is completed and certified by a registered, professional engineer, or for three (3) years from the date the employee left the facility.
- I.Z.1.e. Waste Analysis Plan(s) for each HWMU of this Permit, as required by IDAPA 58.01.05.008 [40 CFR 264.13] and this Permit.
- I.Z.1.f. The Site-wide Contingency Plan and Contingency Plan(s) for each HWMU of this Permit, as required by IDAPA 58.01.05.008 [40 CFR 264.53(a)] and this Permit.
- I.Z.1.g. Closure Plan(s) for each HWMU of this Permit, as required by IDAPA 58.01.05.008 [40 CFR 264.112(a)] and this Permit.
- I.Z.2. Documents as specified by this Permit may be maintained at the facility records storage, records storage in Idaho Falls, and/or Electronic Document Management System [EDMS] Records Vault in a readily retrievable manner. These documents may be maintained solely using an electronic format, as long as the documents are readily retrievable to obtain a printed copy.

## MODULE II - GENERAL FACILITY CONDITIONS

### II.A. DESIGN AND OPERATION OF FACILITY

- II.A.1. The Permittee shall construct, maintain and operate all Hazardous Waste Management Units on the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous/mixed waste/debris or hazardous constituents to the air, soil, ground water, or surface water which could threaten human health and/or the environment.
- II.A.2. The Permittee shall construct and/or maintain all Hazardous Waste Management Units in accordance with the approved designs, specifications, and maintenance schedules that are included as Attachments 1 through 8 of this Permit. Minor deviations from the approved designs or specifications, necessary to accommodate proper construction and the substitution of equivalent or superior materials or equipment, shall be noted on the as-built drawings, and the rationale for those deviations shall be provided in narrative form. After completion of construction of each Hazardous Waste Management Unit, the Permittee shall submit final as-built drawings and the narrative report to the Director as part of the construction certification documentation specified in Permit Condition I.R.
- II.A.3. The Permittee shall comply with all applicable requirements of the Land Disposal Restrictions of IDAPA 58.01.05.011 [40 CFR § 268] or the Idaho National Laboratory (INL) Site Treatment Plan (STP) (published October 31, 1995), as applicable and amended.
- II.A.4. The Permittee shall inspect all tanks, ancillary piping or components from which there has been a release, suspected release, or unexplained volume of missing waste. The suspect tank, piping and components shall not be returned to service until the integrity of the tank, piping and components has been demonstrated and the Permittee has obtained a certification by a qualified Professional Engineer in accordance with IDAPA 58.01.05.008 [40 CFR 264.196(d)].

### II.B. RECEIPT OF OFF-SITE HAZARDOUS WASTE

- II.B.1. The Permittee shall not receive hazardous waste from a foreign source.
- II.B.2. The Permittee shall only receive off-site hazardous waste and debris in accordance with Attachment 1 and 1a of this Permit, and the waste acceptance criteria in Attachment 2 of this Permit.
- II.B.3. The Permittee shall receive off-site mixed waste and debris in accordance with Attachment 1 and 1a of this Permit, the waste acceptance criteria in Attachment 2 of this Permit, and only after it has been approved by IDEQ through the Site Treatment Plan.
- II.B.4. The Permittee may receive shipments from DOE-related Conditionally Exempt Small Quantity Generators provided the Permittee accepts responsibility as the generator of the waste.

- II.B.5 The Permittee may accept INL HW/MW-generated or owned waste in accordance with Attachment 1 and 1a of this Permit, and the waste acceptance criteria in Attachment 2 of this Permit.
- II.B.6. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), the Permittee shall inform the generator (in writing) that the Permittee has the appropriate permit(s) for, and shall accept, the waste the generator is shipping. The Permittee must keep a copy of this written notification as part of the Facility Operating Record, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.12(b)].
- II.B.7. The Permittee shall not accept hazardous/mixed waste/debris generated off-site that has not been verified in accordance with the Waste Analysis Plan requirements of IDAPA 58.01.05.008 [40 CFR § 264.13(c)].
- II.B.8. The Permittee must keep copies of the waste acceptance documentation, and all other documentation associated with acceptance of off-site hazardous waste streams required by Permit Conditions II.B.2 and II.B.3, in accordance with Permit Conditions I.Z.1.b and II.J.1.

#### II.C. WASTE ANALYSIS PLAN

The Permittee shall comply with the Waste Analysis Plans for the HWMUs, as described in Attachment 2 of this Permit.

- II.C.1. The Permittee shall comply with the procedures and requirements of the Waste Analysis Plan for the facility, in accordance with IDAPA 58.01.05.008 and 58.01.05.011 [40 CFR §§ 264.13 and 268.7] and Attachment 2 of this Permit, and as follows:
- II.C.2. The Permittee shall collect and analyze representative samples of waste, in accordance with IDAPA 58.01.05.005, 58.01.05.008, and 58.01.05.011 [40 CFR Part 261, Appendix I and 40 CFR §§ 264.13(a) and 268.7] and Permit Condition I.O.3, as specified in Attachment 2 of this Permit.
  - II.C.2.a. The Permittee shall develop a quality assurance project plan (QAPP) and a field sampling plan (FSP) for waste identification as required in IDAPA 58.01.05.008 [40 CFR 264.13(a)(1)] and submit it to the Director for approval.
- II.C.3. The Permittee shall perform the analysis of each waste stream in accordance with the latest edition of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 (prevailing edition), Standard Methods of Wastewater Analysis (prevailing edition), or equivalent methods approved by the Director in accordance with Permit Conditions I.O.4 and I.O.5 of this Permit. At a minimum, the Permittee shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, the Permittee shall notify the laboratory in writing of the waste analysis conditions it is to meet in order that waste analysis conditions of the Permit are met.
- II.C.4 The Permittee shall document the results of all waste analyses in the Facility Operating Records, in accordance with Permit Condition I.Z.1.b and II.J of this Permit.

II.C.5. In accordance with the sampling and analysis procedures presented in Attachment 2, non-HWMA/RCRA waste, resulting from operation of the SPF or SSS piping/components Hazardous Waste Management Units, will be tested to determine whether potential toxic contaminants are below levels established at IDAPA 58.01.05.011 [40 CFR § 268.48]. In the event contaminant levels are exceeded and further treatment at the SPF or SSS piping/components Hazardous Waste Management Units are not appropriate, the HWMA/RCRA waste will be sent to an appropriate facility.

#### II.D. SECURITY

The Permittee shall comply with the Security Provisions of IDAPA 58.01.05.008 [40 CFR § 264.14] and the SPF and SSS piping/components site-specific, security measures, as described in Attachment 3 of this Permit.

#### II.E. INSPECTION PLAN

The Permittee shall comply with Inspection Schedules and Logs included in Attachment 4 of this Permit. The Permittee shall comply with the inspection provisions of IDAPA 58.01.05.008 [40 CFR § 264.15], and as follows:

- II.E.1. The Permittee shall maintain the inspection records and results, in accordance with Permit Condition I.Z.1.c. The Permittee shall record inspections on the inspection log sheet (included in Attachment 4 of this Permit) or an equivalent, approved log sheet, as specified in IDAPA 58.01.05.008 [40 CFR § 264.15(d)].
- II.E.2. The Permittee shall record on the Inspection Logs and Inspection Log Sheets (required by Permit Condition II.E.1) as specified in IDAPA 58.01.05.008 [40 CFR § 264.15(d)]. At a minimum, the following shall be recorded:
- The date and time of the inspection;
  - The name of the inspector;
  - A notation of the observations made; and
  - The date and nature of any repairs or other remedial actions.
- II.E.3. The Permittee shall remedy, as required by IDAPA 58.01.05.008 [40 CFR § 264.15(c)], any deterioration or malfunction discovered by an inspection.
- II.E.4. The Permittee shall retain the Inspection Logs and Inspection Log Sheets required by Permit Condition II.E.1 for at least three (3) years from the date of the inspection, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.73(b)(5)] and Permit Condition I.Z.1.c.

#### II.F. TRAINING PLAN

- II.F.1. The Permittee shall comply with the Personnel Training Plan, included in Attachment 5 of this Permit and in accordance with IDAPA 58.01.05.008 [40 CFR § 264.16], until each HWMU is closed and certified.

- II.F.2. The Permittee shall ensure that all personnel who handle hazardous/mixed waste/debris are trained in hazardous/mixed waste/debris management, safety, and emergency procedures, as applicable to their job description, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.16], and the Personnel Training Plan included as Attachment 5 of this Permit.
- II.F.3. The Permittee shall maintain the Personnel Training Plan in Attachment 5 of this Permit and documentation of personnel training received, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.16(e)] and Permit Condition I.Z.1.d of this Permit.
- II.G. PREPAREDNESS AND PREVENTION
- II.G.1. The Permittee shall operate each HWMU so as to minimize the possibility of a fire, explosion, or sudden or non-sudden releases to the air or soil that could threaten human health or the environment, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.31] and Attachment 6 of this Permit.
- II.G.2. Fire-fighting equipment shall include, but not be limited to, sodium chloride, soda ash, or suitable dry fire-fighting formulations (e.g., Met-L-X) for when water-reactive metallic wastes are stored in a Hazardous Waste Management Unit.
- II.G.3. The requirement for water for fire fighting, at the SPF and SSS piping/components units is waived when the waste in storage is water-reactive; however, when the waste has been treated to be no longer water-reactive, water for firefighting must be promptly restored in accordance with IDAPA 58.01.05.008 [40 CFR § 264.32(d)].
- II.G.4. The Permittee, at a minimum, shall perform preventative maintenance and repair of the facility emergency equipment, safety devices, and miscellaneous equipment included in the attachments of this Permit, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.33] and the manufacturer's specifications. The Permittee shall maintain records of these preventative maintenance and repair activities on this equipment and schedules, reflecting minimum and planned performance of these preventative maintenance activities in the Operating Record at the facility, in accordance with Permit Condition I.Z.1 and II.J.
- II.G.5. The Permittee shall maintain access to the communications and alarm systems, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.34] and Attachment 6 of this Permit.
- II.G.6. The Permittee shall maintain the aisle width/space necessary to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.35] and Attachment 6 of this Permit.
- II.G.7. The Permittee shall maintain arrangements with state and local authorities, as required by IDAPA 58.01.05.008 [40 CFR § 264.37] and Attachment 7 of this Permit. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee for a given HWMU, the Permittee must document this refusal in the Operating Record for the excluded unit.

## II.H. CONTINGENCY PLAN

- II.H.1. The Permittee shall comply with the Contingency Plan provisions of IDAPA 58.01.05.008 [40 CFR 264 Subpart D, Contingency Plan and Emergency Procedures] and as follows:
- II.H.2. The Permittee shall comply with the Contingency Plan included in Attachment 7 of this Permit.
- II.H.3. The Permittee shall review and amend, as necessary, the Contingency Plans, pursuant to IDAPA 58.01.05.008 and .012 [40 CFR 264.54 and 270.42] and Permit Conditions I.D.4 and I.D.5 of this permit, within fourteen (14) calendar days of the following events:
- II.H.3.a. This Permit is revised;
- II.H.3.b. The plan fails in an emergency;
- II.H.3.c. The Permittee changes the facility design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of mixed waste or mixed waste constituents, or changes the response necessary in an emergency;
- II.H.3.d. The list of emergency coordinators changes; or
- II.H.3.e. The list of emergency equipment changes.
- II.H.4. The Permittee shall assure that a trained Emergency Coordinator or equivalent is available at all times in case of an emergency.
- II.H.5. The Permittee shall submit a copy of the Contingency Plan, and all revisions to the plan, to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.53(b)] and Attachment 7 of this Permit..
- II.H.6. The Permittee shall document in the Facility Operating Record the time, date, and details of any incident that requires implementing the Contingency Plan. Within fifteen (15) days after the incident, the Permittee shall submit a written report on the incident to the Director, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.56(j)] and Attachment 7 of this Permit. Said report shall include, at a minimum, the items in Permit Condition I.T.3. of this Permit.

## II.I. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of IDAPA 58.01.05.008 [40 CFR §§ 264.71, 264.72, and 264.76].

II.J. RECORD KEEPING AND REPORTING

In addition to the record keeping and reporting requirements specified elsewhere in this Permit, the Permittee shall comply with the following:

- II.J.1. The Permittee shall maintain a written Operating Record at the INL Facility, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.73(a)], for all records identified in IDAPA 58.01.05.008 [40 CFR §§ 264.73(b)(1) through (b)(16)], as modified by Permit Condition I.Z.
- II.J.2. The Permittee shall, by March 1 of each year, submit to the Director a Waste Minimization Certification, pursuant to IDAPA 58.01.05.008 [40 CFR § 264.73(b)(9)], that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates, to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or disposal is the most practicable method currently available to the Permittee, which minimizes the present and future threat to human health and the environment.
- II.J.3. The Permittee shall, by March 1 of each even numbered year, submit to the Director a biennial report covering the facility activities pursuant to IDAPA 58.01.05.008 [40 CFR § 264.75(a) through (j)].
- II.J.4. The Permittee shall conduct and complete a source reduction evaluation review and written plan in accordance with the procedures and format provided in the "EPA Waste Minimization Opportunity Assessment Manual" (EPA/625/7-88/003). The review and plan shall be completed in compliance with Permit Condition II.K of this Permit and include, at a minimum, the following general operating and reporting requirements.
  - II.J.4.a. The Permittee shall submit to the Director detailed descriptions of any programs that the Permittee may have to assist generators of hazardous waste in reducing the volume (quantity) and toxicity of wastes they produce.
  - II.J.4.b. The Permittee shall submit the following information to the Director and shall submit revisions or changes to the Director within thirty (30) calendar days after those revisions or changes:
    - II.J.4.c. A list of generators who received information from the Permittee according to Permit Condition II.J.4.a of this Permit.
    - II.J.4.d. A list of generators who used the Permittee's contractor services on a Waste Minimization Program.
    - II.J.4.e. A list of generators known to the Permittee who have a Waste Minimization Program in place and any known results (i.e., has there been a reduction in wastes submitted for treatment, recycling, or disposal).
- II.J.5. All reports, notifications, applications, or other materials required to be submitted to the Director shall be submitted in accordance with Permit Condition I.Y of this Permit.

II.K. COMPLIANCE SCHEDULE

II.K.1. The Permittee shall submit a Waste Minimization Review And Plan, to the Director, March 31, 2007, March 31, 2011, and every four (4) years thereafter, in accordance with Permit Condition II.J of this Permit.

II.L. CLOSURE

II.L.1. The Permittee shall meet the general closure performance standard, as specified in IDAPA 58.01.05.008 [40 CFR § 264.111] and Attachment 8 of this Permit, during closure of all Hazardous Waste Management Units at SPF and for SSS piping/components.

II.L.2. The Permittee shall perform a hazardous waste determination on all solid waste generated during closure including, but not limited to, contaminated process equipment, building components, tanks and ancillary equipment, scrap metal, etc., in accordance with IDAPA 58.01.05.006 [40 CFR § 262.11] and Attachment 2 of this Permit.

II.L.3. The Permittee shall amend the Closure Plans, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.112(c)] and Attachment 8 of this Permit whenever necessary.

II.L.4. The integrity of waste lines that will not be removed as a part of closure shall be determined by pressure testing, or other methods pre-approved by the Director, prior to completion of decontamination activities.

II.L.4.a. If a line fails a pressure test, or other integrity test method pre-approved by the Director, the Permittee shall determine the cause of the failure (e.g. open connection, loss of line integrity, malfunctioning pressure relief valve, etc.).

II.L.4.b. If a line fails a pressure test, or other integrity test method pre-approved by the Director, the Permittee shall determine if there has been a release to the environment.

II.L.4.c. During all closure activities, atmospheric releases of hazardous waste and hazardous waste constituents shall be minimized by venting any off-gases through the appropriate off-gas system. If gases are vented directly to the atmosphere, the Permittee shall obtain any necessary air permits or exemptions.

II.L.4.d. The Permittee shall conduct sampling and analysis, performed in accordance with Permit Condition I.O., to verify that the Clean Closure Performance Standard has been achieved.

II.M. EQUIVALENT MATERIALS/INFORMATION

II.M.1. If certain equipment, materials, and administrative information (such as names, phone numbers, addresses) are specified in this Permit, the Permittee is hereby authorized to use equivalent or superior items. Use of such equivalent or superior items shall not be considered a modification of this Permit, but the Permittee shall place the revision in the Operating Record (prior to the institution of such revision), accompanied by a narrative explanation and the date the revision became effective. The Director may judge the soundness of the revision during inspections of the facility and take appropriate action. The format of tables, forms, and figures are not subject to the requirements of this Permit, and may be revised at the Permittee's discretion.

II.M.2. If the Department determines that the substitution was not equivalent to the original, it will notify the Permittee that the Permittee's claim of equivalency has been denied, the reasons for the denial, and that the original material or equipment must be used. If the product substitution is denied, the Permittee shall comply with the original, approved product specification, find an acceptable substitution, or apply for a permit modification, in accordance with Permit Condition I.D.4.

II.N. CLOSURE COST ESTIMATE AND FINANCIAL ASSURANCE

The Permittee, as a federal facility, is exempt from the closure cost estimate and financial assurance requirements, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.140(c)].

II.O. LIABILITY REQUIREMENTS

The Permittee, as a federal facility, is exempt from the liability coverage for sudden and accidental occurrence requirements, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.140(c)].

**MODULE III - CONTAINER STORAGE AND TREATMENT**

III.A. PERMITTED CONTAINER STORAGE and/or TREATMENT AREAS

Subject to the terms of this Permit, the Permittee may store and/or treat hazardous/mixed waste/debris specified in Permit Condition III.B of this Permit in the following hazardous waste container storage and/or treatment areas:

III.A.1.

<b>SODIUM PROCESS FACILITY (SPF)</b>		<b>BUILDING #</b>	<b>799</b>
<b>PROCESS CODES:</b>		<b>S01 T04</b>	
<b>DESCRIPTION:</b>	<p><b>Sodium Process Area (SPA):</b> Is an enclosed, L-shaped structure with a carbon-steel-lined concrete pad. SPF has three designated areas for permitted HW/MW container storage, verification, repackaging and treatment.</p> <p><b>Barrel Holding Room:</b> Is 20.5' x 25' (512.5 square feet) and is used to receive HW/MW through a 10' x10' sliding door on the east exterior wall. Waste is removed through a 6' x 6' sliding door on the west wall that leads into the Sodium Melting and Draining Room. This room is used for HW/MW container storage and or treatment.</p> <p><b>Sodium Melting and Draining Room:</b> Is 25' x 22' and contains eight (8) barrel container assemblies and two (2) insulated barrel draining manifolds and is used for HW/MW container storage and or treatment.</p> <p><b>Carbonate Process Area (CPA):</b> Has a 23' x 25' main processing area, a 17' x 16' shielded staging area which includes a <b>Drum Fill Area</b> (142 gal), a <b>Drum Palletizer Area</b> (284 gal), and a 30' x 72' L-shaped <b>Drum Storage Area</b> (6,248 gal). All areas are on a reinforced-concrete pad and have cinder block walls. The CPA is used for HW/MW container storage and or treatment.</p>		
<b>CAPACITY:</b>	<p><b>Container Storage:</b> 9,386 gal</p> <p><b>Container Treatment:</b> 440 gal/day</p>		
<b>NOTES:</b>	SPF has been Part B permitted for storage and treatment since January 1997.		

III.B. PERMITTED AND PROHIBITED WASTES

The Permittee may only store/treat mixed/hazardous waste that is identified in Permit Conditions III.B.1. The Permittee may store/treat mixed/hazardous wastes subject to Attachments 1 and 2 of this Permit, and as follows:

III.B.1.

<b>SODIUM PROCESS FACILITY (SPF) – Buildings 799 and 799A</b>	
<b>Allowed Waste Types</b>	<b>Barrel Holding Room:</b> Ignitable, Reactive, Corrosive, Toxic Metal, Na, NaK, NaOH, or KOH <b>Sodium Melting and Draining Room:</b> Ignitable, Reactive, Corrosive, Toxic Metal, Na, NaK <b>Carbonate Process Area/ Drum Storage Area:</b> Sodium and/or Potassium Hydroxide (NaOH, KOH)
<b>Hazardous Waste Codes</b>	D001, D002, D003, D004-D011
<b>Process Codes</b>	<b>Barrel Holding Room:</b> S01, T04 <b>Sodium Melting and Draining Room:</b> T04, S01 <b>Carbonate Process Area/Drum Storage Area:</b> T04, S01
<b>Maximum Volume</b>	The maximum mixed waste volume for all the SPF HWMA Units combined is <b>9,386 gal</b> , mixed waste volume for each storage unit, and set as follows: <b>Barrel Holding Room:</b> 2272 gal (or 32 drums) <b>Sodium Melting and Draining Room:</b> 440 gal <b>Carbonate Process Area/Drum Storage Area:</b> 6674 gal
<b>Activities Allowed</b>	Storage, Absorption of free liquids, Deactivation (ignitables/reactives), Melt/Drain, Neutralization, Solidification, and Water washing/spraying
<b>Types of Containers</b>	<b>See Table D-1 in Attachment 1, Section D – Facility Description for a listing of example container types</b> <b>Barrel Holding Room:</b> 55 & 71-Gal Metal Drums <b>Sodium Melting and Draining Room:</b> 55- gal Metal Drums <b>Carbonate Process Area/Drum Storage Area:</b> 71- gal Metal Drums

III.C CONDITION OF CONTAINERS

III.C.1 If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition, or otherwise manage the waste in compliance with the conditions of this Permit and IDAPA 58.01.05.008 [40 CFR § 264.171].

III.C.2. The Permittee shall store wastes in containers at the SPF HWMA Units in accordance with Attachment 1 of this Permit.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

III.D.1. The Permittee shall assure that the ability of the container to contain the waste is not impaired, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.172].

III.D.2. In a case where an overpack might be used to secure sodium or NaK, the Permittee shall (through purging or some other means) assure the annular space is void of potentially incompatible gasses including, but not limited to, ambient air.

III.E. MANAGEMENT OF CONTAINERS

The Permittee shall keep all containers closed during storage and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.173].

### III.F. SECONDARY CONTAINMENT SYSTEMS

The Permittee shall maintain all SPF HWMA Unit Containment Systems in accordance with IDAPA 58.01.05.008 [40 CFR § 264.175] and the attached plans and specifications, as contained in Attachment 1 of this Permit

- III.F.1. Secondary containment at the SPF HWMA Units may consist of spill pallets or pans, standard waste boxes, sumps, and/or lined rooms, as described in Attachment 1, which are capable of containing 10% of the total volume of waste containers or 100% of the volume of the largest waste container stored within.

### III.G. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the SPF HWMA Units, in accordance with the Inspection Schedules contained in Attachment 4 of this Permit, to detect leaking containers and deterioration of containers and/or the containment system caused by corrosion and other factors.

### III.H. RECORD KEEPING

The Permittee shall document the results of all inspections and waste analyses performed in the Operating Record, in accordance with Permit Conditions I.Z and II.J of this Permit.

### III.I. CLOSURE

The Permittee shall close the SPF HWMA Units, in accordance with the procedures set forth in the respective plans in Attachment 8 and by Permit Condition II.L of this Permit.

### III.J. IGNITABLE OR REACTIVE WASTES

The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes by following the procedures specified in Attachment 6 of this Permit.

### III.K. INCOMPATIBLE WASTE

- III.K.1. The Permittee shall not place incompatible wastes, or wastes and materials which are incompatible in the same container, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.177].
- III.K.2. The Permittee shall not place hazardous waste or materials in an unwashed container that previously held an incompatible waste or material.
- III.K.3. The Permittee shall not store a container holding hazardous waste that is incompatible with any waste, or any materials stored nearby in containers, without separating these incompatible wastes or materials by protecting the wastes from commingling by means of a dike, berm, or wall.

**MODULE IV - TANK SYSTEM STORAGE AND/OR TREATMENT**

**IV.A. PERMITTED TANK SYSTEM STORAGE AND/OR TREATMENT AREAS**

Subject to the terms of this Permit, the Permittee may treat and/or store hazardous wastes, specified in Permit Condition IV.D of this Permit, in the following hazardous waste Treatment and/or Storage Tank Systems, located and operated as indicated in Attachment 1 and 1a and this Permit.

**IV.A.1.**

<b>SODIUM PROCESS FACILITY (SPF)</b>		<b>BUILDING #</b> 799 and 799A
<b>PROCESS CODES:</b> S02 T01		
<b>DESCRIPTION:</b>	<p><b>SPF:</b> Has one (1) designated area for permitted HW/MW tank storage and treatment, the Sodium Process Equipment Area.</p> <p><b>Sodium Process Equipment Area:</b> Is approximately 20' x 27' in an L-shaped configuration. The process area floor is a concrete pad, and the secondary containment pits are lined with welded carbon steel plate. This area contains the following:</p> <p><b>5,000-gal Sodium Storage Tank</b>, 24' long x 6' diameter,  <b>730-gal Sodium Day Tanks (two)</b>, 10' high x 4' diameter,  <b>500-gal Sodium Reaction Vessel</b>, 15.5' high x 2.5' diameter,  <b>1,000-gal Caustic Cooling Tank</b>, 11.5' high x 4' diameter,  <b>4,000-gal Caustic Storage Tank</b>, 13' long x 7' diameter (located in Building 799A),  <b>500-gal Water Holding Tank</b>, 7.33' high x 4' diameter.</p>	
<b>CAPACITY:</b>	<p><b>Tank Storage:</b> 11,960 gal  <b>Tank Treatment:</b> 1,080 gal/day</p>	
<b>NOTES:</b>	This facility has been Part B permitted since January 1997.	

<b>SECONDARY SODIUM SYSTEM (SSS) PIPING/COMPONENTS</b>		<b>BUILDING #</b> 766
<b>PROCESS CODES:</b> S02, T01		
<b>DESCRIPTION:</b>	<p>The SSS piping/components consists of Secondary Sodium Drain Tank System piping/components located in the eastside of Building MFC-766. The eastside of the building is 69.5' x 43.25' x 2.92' concrete floor with a secondary containment of welded carbon steel, with a capacity of 65,653 gallons. This area contains the following:</p> <p><b>1,200-gal Relief Tank</b>, 25' 4" long x 3' diameter  <b>1,200-gal Surge Tank</b>, 16' long x 4' diameter  <b>7 220-gal (1,540 gallons total) Evaporators</b>, 30' 2" long x 56" diameter  <b>2 220-gal (440 gallons total) Superheaters</b>, 30' 2" long x 56" diameter  <b>35-gal Sodium Pump</b>  <b>5,037-gal piping</b></p>	
<b>CAPACITY:</b>	<p><b>Tank system ancillary equipment storage (SSS piping/components): 9,452 gallons</b>  <b>Tank system ancillary equipment treatment (SSS piping/components) : 785 gallons/day</b></p>	
<b>NOTES:</b>	The SSS piping/components have been Part B permitted for storage since December 2002, and for treatment since 2009.	

IV.A.2 The following components are integral equipment to the Secondary Sodium System (SSS) piping/components unit; Relief Tank, Surge Tank, 7 Evaporators, 2 Superheaters, Sodium Pump and piping. Failure of one of these components will result in the shutdown of a portion of the unit. These components may contain de minimus volumes of waste during closure activities.

IV.B. PERMITTED AND PROHIBITED WASTE

The Permittee shall not treat or store hazardous waste that is not identified in Permit Condition IV.B.1 of this Permit. The Permittee may store and/or treat hazardous wastes in tanks, subject to the terms of this Permit and as follows:

IV.B.1

<b>SODIUM PROCESS FACILITY (SPF)</b>	
<b>Allowed Waste Types</b>	<b>SPF Sodium Storage Tank:</b> Ignitable, Reactive, Corrosive and/or Toxic Metal Waste: Na, NAK, NaOH, KOH. <b>Sodium Day Tanks (2):</b> Ignitable, Reactive Corrosive and/or Toxic Metal Waste: Na, NAK, NaOH, KOH <b>Sodium Reaction Vessel:</b> Toxic Metal Waste: Na, NAK, NaOH, KOH <b>Caustic Cooling Tank:</b> Na, NAK, NaOH, KOH <b>SPF Caustic Storage Tank:</b> Na, NAK, NaOH, KOH <b>Water Holding Tank:</b> Corrosive and/or Toxic Metal Waste
<b>Hazardous Waste Codes</b>	<b>SPF Sodium Storage Tank:</b> D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011 <b>Sodium Day Tanks (2):</b> D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011 <b>Sodium Reaction Vessel:</b> D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011 <b>Caustic Cooling Tank:</b> D002 <b>SPF Caustic Storage Tank:</b> D002 <b>Water Holding Tank:</b> D002, D004, D005, D006, D007, D008, D009, D010, D011
<b>Process Codes</b>	<b>SPF Sodium Storage Tank:</b> S02 <b>Sodium Day Tanks (2):</b> S02 <b>Sodium Reaction Vessel:</b> T01 <b>Caustic Cooling Tank:</b> S02 <b>SPF Caustic Storage Tank:</b> S02 <b>Water Holding Tank:</b> S02
<b>Maximum Volume</b>	<b>SPF Sodium Storage Tank:</b> 5000 gal <b>Sodium Day Tanks (2):</b> 730 gal Each <b>Sodium Reaction Vessel:</b> 1,080 gal/day <b>Caustic Cooling Tank:</b> 1,000 gal <b>SPF Caustic Storage Tank:</b> 4,000 gal <b>Water Holding Tank:</b> 500 gal
<b>Tank construction material</b>	<b>SPF Sodium Storage Tank:</b> Carbon Steel (0.25") <b>Sodium Day Tanks (2):</b> Carbon Steel (0.25") <b>Sodium Reaction Vessel:</b> S-200 Nickel (0.25") <b>Caustic Cooling Tank:</b> S-200 Nickel (0.13") <b>SPF Caustic Storage Tank:</b> S-300 Stainless Steel (0.25") <b>Water Holding Tank:</b> S-304 Stainless Steel (10 gauge)
<b>Activities Allowed</b>	Storage, Deactivation (ignitables/reactives), Melt/Drain, and Neutralization

<b>Secondary Containment System Description</b>	<b>SPF Sodium Storage Tank &amp; Sodium Day Tanks (2):</b> Carbon Steel (0.19") Over Sand Floor and Concrete Walls - Dimensions: 41' x 16' x 1.5' - Capacity: 7,360 gal <b>Sodium Reaction Vessel &amp; Caustic Cooling Tank:</b> Type - Carbon Steel-Lined (0.19") Compacted-Sand Floor Pit and Formed Concrete Walls - Dimensions: 21.5' x 13' x 14' - Capacity: 2,440 gal <b>SPF Caustic Storage Tank:</b> Type - Carbon Steel-Lined, - Dimensions: 12' x 17' x 3' - Capacity: 4,580 gal <b>Water Holding Tank:</b> Capacity - Drains into the Caustic Tank Pit. Caustic Tank Pit: 2,440 gal - Dimensions: Caustic Pit: 21.5' X 13' X 14'
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IV.B.2

<b>SECONDARY SODIUM SYSTEM (SSS) PIPING/COMPONENTS</b>	
<b>Allowed Waste Types</b>	Waste Sodium (Na) and/or sodium potassium alloy (Na/NaK) only
<b>Hazardous Waste Codes</b>	Ignitable: D001, Corrosive: D002, Reactive: D003, Chromium: D007
<b>Process Codes</b>	S02, T01
<b>Maximum Volume</b>	Capacity: Tank Storage- 9,452 gallons, Treatment- 785 gallons/day
<b>Tank construction material</b>	stainless steel
<b>Activities Allowed</b>	Storage, Deactivation/treatment (ignitables/reactives), Melt/Drain, and Neutralization
<b>Secondary Containment System Description</b>	carbon steel-lined concrete walls Dimensions: 69.5 feet x 43.25 feet x 2.92 feet Capacity: 65,653 gallons

IV.C. SECONDARY CONTAINMENT

Prior to being put into service, any new secondary containment for HWMA/RCRA-regulated tanks shall be designed, constructed, and prepared for operation, in accordance with IDAPA 58.01.05.008 [40 CFR §§ 264.193 (b) through (f)], as specified in approved, detailed design, and this Permit.

IV.D. TANKS AND TANK SYSTEM INSTALLATION

IV.D.1. The Permittee shall install new tank and tank systems (including secondary containment) and all associated ancillary equipment, as specified in approved, detailed design.

IV.D.1.1. If the Permittee replaces a component of the tank system, that component must satisfy the requirements for new tank systems or components in IDAPA 58.01.05.008 [40 CFR §§ 264.192 and 264.193].

IV.D.2. In accordance with IDAPA 58.01.05.008 [40 CFR §§ 264.192(b)and(g)], the Permittee shall obtain, and keep on file at the INL Facility, written statements from an independent, qualified, installation inspector or independent, qualified, registered professional engineer attesting that proper installation procedures, for all tanks and tank systems, were used.

IV.D.3. The independent tank system installation inspection(s) required by Permit Condition IV.D.2 of this Permit shall include, but not be limited to, inspection of the system for the presence of any of the following items:

- Weld breaks;

- Punctures;
- Scrapes and Protective Coatings;
- Cracks;
- Corrosion; and/or
- Other Structural Damage or Inadequate Construction/Installation.

IV.D.4. In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(I)] and Permit Condition I.R of this Permit, the Permittee shall not treat or store hazardous waste at the SPF or the SSS piping/components prior to submitting to the Director (by certified mail or hand delivery) a letter signed by the Permittee and a registered, professional engineer stating that the tank systems or ancillary equipment (i.e., SSS piping/components) have been constructed or modified in compliance with this Permit.

#### IV.E. TANK SYSTEM OPERATING CONDITIONS

IV.E.1. The Permittee shall prevent spills and overflows from the SPF Tank System and from the SSS piping/components using the procedures and equipment described in Attachments 6 and 8 of this Permit.

IV.E.2. The Permittee shall not place hazardous wastes or treatment reagents in the SPF Tank System if they could cause any tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail, in accordance with IDAPA 58.01.05.008 [40 CFR 264.194(a)] and Attachments 1, 2, and 6 of this Permit.

IV.E.3. The Permittee shall not place hazardous wastes or treatment reagents in the SSS piping/components if they could cause the piping/components or a containment system to rupture, leak, corrode, or otherwise fail, in accordance with IDAPA 58.01.05.008 [40 CFR 264.194(a)] and Attachments 1, 2, and 6 of this Permit.

#### IV.F. RESPONSE TO LEAKS OR SPILLS

IV.F.1. In the event of a leak or a spill from a tank system or SSS piping/components, or if a tank system or SSS piping/components becomes unfit for continued use, the Permittee shall remove the tank system or the SSS piping/components from service immediately and complete the following actions:

IV.F.1.a. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.

IV.F.1.b. Remove waste and accumulated precipitation from the system within twenty-four (24) hours of detection of the leak, to prevent further release and to allow inspection and repair of the system. If the Permittee finds that meeting this time period will be impossible, the Permittee shall notify the Director and demonstrate that more time is required.

IV.F.1.c. If the collected material is a HWMA hazardous waste, it shall be managed in accordance with all applicable requirements of IDAPA 58.01.05.006 through .008 [40 CFR Parts 262 through 264]. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters or to a POTW, it is subject to

requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under 40 CFR Part 302.

IV.F.1.d. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection, complete the following:

- prevent further migration of the leak or spill to soils or surface water, and
- remove and properly dispose of any visible contamination of the soil or surface water.

IV.F.1.e. Close the system in accordance with the Closure Plan specified in Attachment 8 of this Permit, unless the following actions are taken:

- For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs before returning the tank system to service.
- For a release caused by a leak from a primary tank system to a Secondary Containment System, the Permittee shall repair a primary tank system prior to returning it to service.
- For a release to the environment caused by a leak from an aboveground portion of the ancillary equipment that does not have secondary containment, the Permittee shall repair the tank system prior to returning it to service.
- If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in IDAPA 58.01.05.008 [40 CFR §§ 264.192 and 264.193].

IV.F.2. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee shall obtain a certification by an independent, qualified, registered, professional engineer that the repaired system is capable of handling hazardous waste without release for the intended life of the system before returning the system to service. Examples of major repairs are installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault. Record of such repairs shall be maintained in accordance with Permit Condition I.Z.1.b of this Permit.

#### IV.G. INSPECTION SCHEDULES AND PROCEDURES

IV.G.1. The Permittee shall inspect the tank systems and the SSS piping/components, in accordance with the Inspection Schedule specified in Attachment 4 of this Permit, and shall comply with Permit Conditions IV.G.2 and IV.G.3 of this Permit, as part of those inspections.

IV.G.2. The Permittee shall inspect the overfill controls, in accordance with the timetable in the Inspection Schedule specified in Attachment 4 of this Permit.

IV.G.3. The Permittee shall inspect the following (at a minimum) once each operating day, in accordance with Attachment 4 [F-2(b)(2) and Attachment F-2].

IV.G.3.a. Aboveground portions of the tank system(s) and ancillary equipment (this includes the SSS piping/components), to detect corrosion or releases of waste.

- IV.G.3.b. Construction materials and the area immediately surrounding the externally accessible portion of the tank system(s) and SSS piping/components, including the Secondary Containment System, piping, valves, and pumps, to detect erosion or signs of releases of hazardous waste.
- IV.G.3.c. Data gathered from monitoring and leak detection input to ensure tank systems and SSS piping/components are being operated according to design.
- IV.G.4. The Permittee shall document compliance with Permit Conditions IV.G.2 and IV.G.3 of this Permit and place this documentation in the Operating Record for the SPF and SSS piping/components HWMA Units, as required by Permit Condition I.Z and II.J of this Permit.

#### IV.H. RECORD KEEPING AND REPORTING

- IV.H.1. Releases from tanks or SSS piping/components that are totally contained within a Secondary Containment System need not be reported. However, said releases shall be recorded in the Operating Record required by Permit Condition I.Z and II.J of this Permit and shall include the date and time of the release, tank/piping/component identification, the name and title of the employee documenting the release, the size and amount of the release, and all actions taken.
- IV.H.2. The Permittee shall verbally report to the Director, within twenty-four (24) hours of detection, when a leak or spill from a tank system or SSS piping/components is released to the environment, in accordance with Permit Condition I.T of this Permit.
- IV.H.3. In addition to complying with the requirements of Permit Condition I.T of this Permit, within thirty (30) calendar days of detecting a release to the environment from a tank system or SSS piping/components, the Permittee shall report the following to the Director:
  - IV.H.3.a. Likely route of migration of the release;
  - IV.H.3.b. Characteristics of the surrounding soil (including soil composition, geology, and hydrogeology, taking into account possible climatic effects on the soil characteristics);
  - IV.H.3.c. Results of any monitoring, sampling, or air dispersion modeling conducted in connection with the release;
  - IV.H.3.d. Proximity of downgradient drinking water, surface water, and populated areas; and
  - IV.H.3.e. Description of response actions taken or planned.
- IV.H.4. The Permittee shall obtain, and keep on file in the Operating Records as specified in Permit Condition I.Z and II.J, the written statements by those persons required to certify the design and installation of the tank system(s) or SSS piping/components, as specified in Permit Condition IV.D.2 of this Permit, until the tank system or SSS piping/components is certified closed in accordance with Permit Condition II.L of this Permit.

IV.H.5. In the event that a tank exceeds the maximum allowable capacity designated for that tank or SSS piping/components as specified in Permit Conditions IV.A and IV.B of this Permit, the Permittee shall document in the Operating Record, required by Permit Condition II.J.1 of this Permit, the following information:

IV.H.5.a. The date and time of occurrence;

IV.H.5.b. The tank/piping/component identification as specified in Permit Condition IV.B of this Permit;

IV.H.5.c. Indicate if any other available tank storage volume, within an MFC HWMA Unit, is available and identify such tank by the tank identification specified in Permit Condition IV.B of this Permit;

IV.H.5.d. If additional storage capacity was not available within an MFC HWMA Unit Storage System, indicate whether the affected system was equipped with an automatic cutoff, and whether it was activated;

IV.H.5.e. Indicate if the tank(s) or SSS piping/components has a high-level alarm system, and whether it was activated; and

IV.H.5.f. Describe the operating control procedures that allowed the tank system or SSS piping/components to exceed the maximum capacity.

IV.H.6. The Permittee shall document compliance with Permit Conditions IV.H.2 and IV.H.3 of this Permit by placing the documentation in the Operating Records for the SPF and SSS piping/component HWMA Units, required by Permit Condition II.J of this Permit.

IV.H.7. The Permittee shall submit, to the Director, all certifications of major repairs to correct leaks within seven (7) calendar days from returning the tank or SSS piping/component systems to use.

#### IV.I. CLOSURE

IV.I.1. The Permittee shall close the tank systems in accordance with the Closure Plans, included as Attachment 8 and this Permit and all applicable requirements in IDAPA 58.01.05.008 and 58.01.05.012 [40 CFR §§ 264. 111 through 264.115 and 270.14]

#### IV.J. SPECIAL TANK PROVISIONS FOR IGNITABLE/REACTIVE WASTES

The Permittee shall not place ignitable or reactive waste in the tank systems or the SSS piping/components, unless the procedures specified in Attachment 6 of this Permit are followed.

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PERMIT NUMBER: ID4890008952  
EFFECTIVE DATE: August 16, 2004  
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### **MODULE V - CORRECTIVE ACTION**

- V.A. The corrective action requirements for these facilities are addressed in the Volume 18 HWMA Storage and Treatment Permit for the INTEC on the INL, Module VII.
- V.B. In the event that both the FFA/CO and the Volume 18 – HWMA Storage and Treatment Permit for the INTEC on the INL, Module VII. are vacated, the Permittee shall submit a permit modification in accordance with Permit Condition I.D.4. of this Permit.