



Department of Energy

Idaho Operations Office
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November 3, 2011

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Richland, WA 99352

Mr. Daryl Koch
FFA/CO Manager
Waste and Remediation Division
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

SUBJECT: Addendum to Table 1. of the Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project (DOE/ID-11293, Revision 1) (EM-FMDP-11-097)

Dear Mr. Faulk and Mr. Koch:

The Idaho Cleanup Project (ICP) requests concurrence from the Department of Environmental Quality (DEQ) and the Environmental Protection Agency (EPA) for inclusion of the Accelerated Retrieval Project (ARP) structures with the list of structures to be decommissioned pursuant to the *Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project* (DOE/ID-11293, Revision 1, January 2009). This non-time critical removal action (NTCRA) approach is intended to simplify administrative processes for management of these structures and associated wastes generated during decommissioning.

The potential for modifying the scope of the NTCRA subsequent to the signing of the Action Memorandum was addressed during the public review period of the *Engineering Evaluation/Cost Analysis for General Decommissioning Activities under the Idaho Cleanup Project* (DOE/ID-11291, August 2006). This provision to modify the list was memorialized in the Action Memorandum itself in Section 1., Statement of Basis and Purpose, which states,

"ICP may be asked to decommission other Idaho National Laboratory (INL) buildings and structures with similar characteristics, contaminants, and complexity to those

Mr. Koch
Mr. Faulk

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specifically identified in Section 2.1.1 0, Table 1. This Action Memorandum intends to allow the potential future inclusion of such buildings and structures under the scope of this NTCRA, as appropriate. If additional buildings and structures are added to the list in Table 1, concurrence from DEQ and EPA will first be obtained, and a letter will be placed in the Administrative Record for this NTCRA identifying the building or structure and explaining why it is sufficiently similar to the facilities specifically identified in this Action Memorandum and appropriate for inclusion under the scope of the NTCRA."

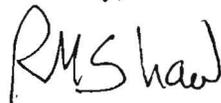
The ARP structures are located within CERCLA Operable Unit 7-13/14 in the sub-surface disposal area (SDA) of the Radioactive Waste Management Complex and were used to provide containment for the excavation of targeted waste streams. The decommissioning of these structures is similar in nature to the decommissioning for the Glovebox Excavator Method (GEM) Facility as a NTCRA that was completed in 2009. Further information on the ARP structures are provided in Enclosure 1 to this letter.

The enclosure to this letter further defines the scope of the decommissioning activities and provides explanation as to why these structures are similar in "characteristics, contaminants, and complexity" to the other buildings identified for general decommissioning action memo Table 1, and are appropriate for inclusion as NTCRAs.

Please note that these facilities are located within CERCLA Operable Unit 7-13/14 and the D&D of these facilities was addressed in *the Phase 1 Remedial Design/Remedial Action Work Plan for Operable Unit 7-13/14* (DOE/ID-11389) with anticipated wastes disposed as CERCLA waste primarily within the SDA. Geographical Information System (GIS) data on disposal locations for the structural steel and fabric will be recorded in project completion records and transmitted to the OU 7-13/14 Environmental Restoration program. General decommissioning and waste management will be conducted in accordance with applicable or relevant and appropriate requirements (ARARs) and waste disposition identified in the attachment to this letter.

Upon receipt of your concurrence with this determination, this letter and enclosure, along with your concurrence letters, will be posted to the Administrative Record, and will serve as an addendum to Section 2.1.1 0, Table 1, of the Action Memorandum. This information will also be incorporated into the next revision of that document.

Sincerely,



R. Mark Shaw, Federal Project Director
Facilities Disposition Project
Idaho Cleanup Project

enclosure

ID DISTRIBUTION:

Email to: ! DOE-ID Admin Support
SHAW,ROBERT M
Katie Hain
Kevin O'Neill
Doug Pruitt
Dave Eaton (CWI)

CONCURRENCE:

RECORD NOTES:

1. This letter transmits the Addendum to Table 1.of the Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project (DOE/ID-11293, Revision 1)
2. This letter was written by Mark Shaw with input from Katie Hain and CWI.
3. This letter closes Pegasus action NA.
4. The attached correspondence has no relation to the Naval Nuclear Propulsion Program.
5. The attached correspondence has no relation to the ARRA stimulus funding.

Enclosure 1 Accelerated Retrieval Project Structures

The Accelerated Retrieval Project (ARP) structures are located within CERCLA Operable Unit 7-13/14 in the Subsurface Disposal Area (SDA) at the Radioactive Waste Management Complex (RWMC). See Figures 1-1 and 1-2. These structures will be decommissioned under the General Decommissioning Action Memo (DOE/ID-11293) as anticipated in the OU 7-13/14 Remedial Action/Remedial Design Work Plan (DOE/ID-11389). The purpose of these ARP structures was to support targeted waste retrieval in order to remove specific waste forms that were highly contaminated with solvents, transuranics, and uranium. These structures will need to be removed to prior to the installation of the final cap over the SDA. The ARP structures include ARPs I, II, III, IV, V, VI, VII, VIII, IX, and WMF-698.

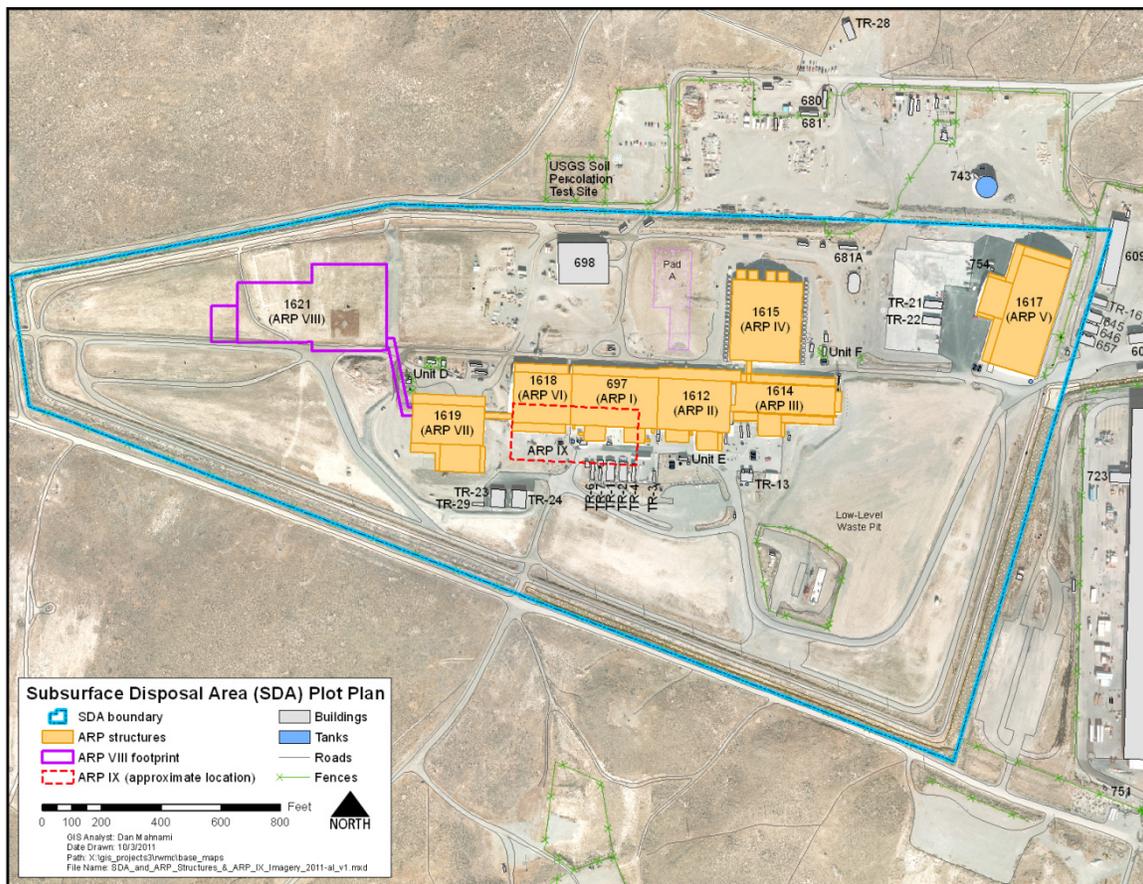


Figure 1-1. Accelerated Retrieval Project locations.

The NTCRA approach is consistent with anticipated decommissioning approach laid out in the *Phase 1 Remedial Design/Remedial Action Work Plan for Operable Unit 7-13/14* (DOE/ID-11389). That document states in Section 3.4, bullet 14, that interim or final removal and disposition of structures (e.g. retrieval enclosures, airlocks, and waste storage facilities) will be planned and executed either under the ICP General Decommissioning Action Memorandum (DOE/ID-11293) or in Phase 3.

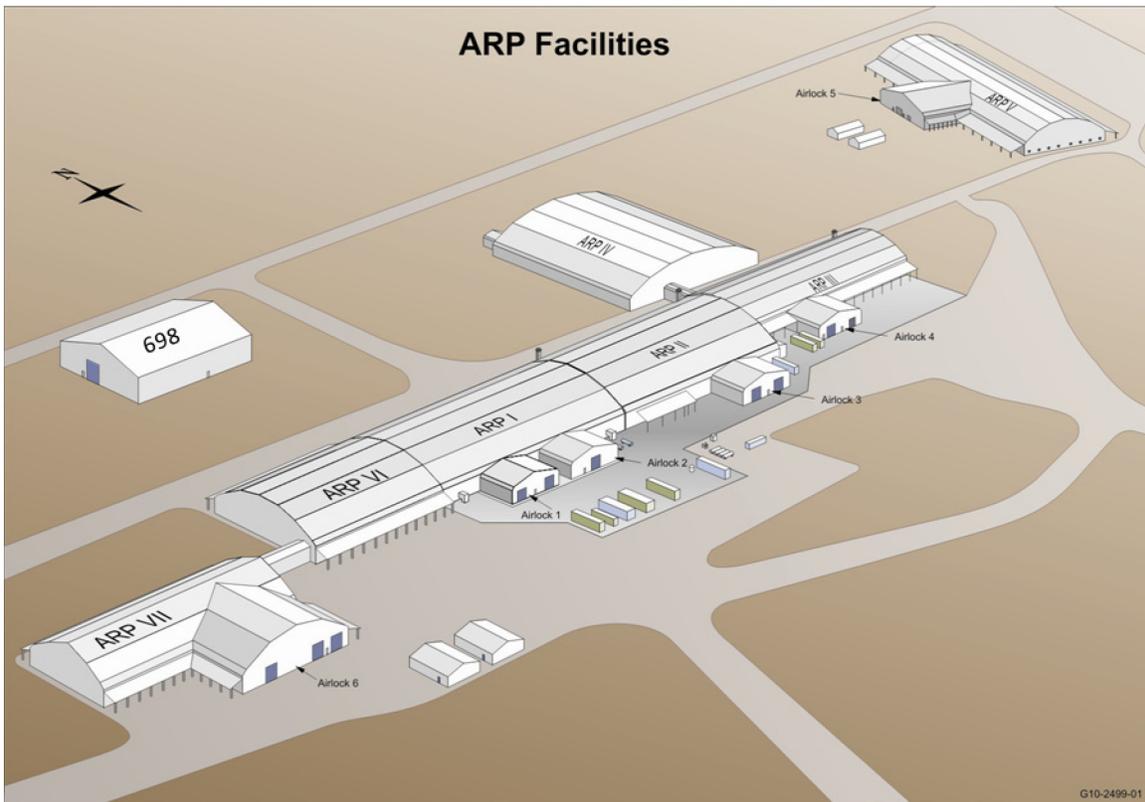


Figure 1-2. Accelerated Retrieval Projects (ARPs VIII and IX not shown)

The decommissioning of these structures is similar in nature to the decommissioning for the Glovebox Excavator Method (GEM) Facility that was completed in 2009. Waste disposition for the decommissioning of ARP structures was specifically addressed in the OU 7-13/14 RD/RA WP. Table 10 in section 4 of that document (see Table 1-1 below) stated that the waste from decommissioning would be managed as CERCLA waste with disposal primarily within the SDA. The vast majority of waste from the decommissioning of the ARP structures is anticipated to be disposed within the SDA. Only those items that are removed for reuse with other ARP structures or are not compatible with disposal in the SDA would not be disposed within the SDA. These items would be removed for reuse or removed and prepared for disposal elsewhere. Examples for disposal elsewhere include batteries and lighting systems. Non-radiological and non-hazardous demolition waste may be sent to the INTEC CERCLA Demolition Waste Landfill for disposal.

Table 1-1. Waste Disposition from DOE/ID-11389 Section 4 Table 10.

Waste Stream Description	Expected Type(s)	Storage or Staging Location	Planned Disposition
Personal protective equipment that has come in contact with waste from the SDA (e.g., respirators, air lines, leather gloves, and safety clothing)	CERCLA	Retrieval enclosure, airlock, or CERCLA area in the SDA	Disposal in the SDA or ICDF.

Waste Stream Description	Expected Type(s)	Storage or Staging Location	Planned Disposition
Debris that has come in contact with CERCLA waste from the SDA (e.g., hand tools, machinery and equipment [that contain no liquids], wood, plastic sheeting, sampling equipment, plastic buckets, pumps, air sample pumps, filters, plastic jugs, hydraulic hoses containing no liquids, tripods, survey equipment, tubing, valves, gaskets, and empty drums)	CERCLA	Retrieval area, airlock, or CERCLA area in the SDA	Disposal in the SDA or ICDF (in accordance with the ICDF waste acceptance criteria). Used <i>tray</i> liners from re-worked drums shall not be returned to the SDA. Empty re-worked drums (intact or splayed) and associated <i>drum</i> liners may be returned to the SDA if they meet the RCRA definition of empty.
Miscellaneous waste generated from construction, decontamination, operation, or maintenance of retrieval enclosures, airlocks, or other structures (e.g., rags, absorbed condensate, decontamination water, and plastic)	CERCLA	Retrieval enclosure, airlock, or CERCLA area in the SDA	Disposal in the SDA. Decontamination fluids may be applied as dust suppressant in the retrieval enclosure or absorbed by soils when decontamination is occurring in the retrieval enclosure.
Radiological control survey waste	CERCLA (associated with contamination, or suspected contamination, from the SDA)	Retrieval enclosure, airlock, or CERCLA area in the SDA	Disposal in the SDA, ICDF, or off-INL Site facility.
Personal protective equipment waste from decontamination	CERCLA	Retrieval enclosure, airlock, or CERCLA area in the SDA Note: Some personal protective equipment, including respirators, may be sent to a radiological laundry for cleaning and reuse and not generated as waste.	Disposal in the SDA.
Nonhazardous tools and equipment	CERCLA	Retrieval enclosure, airlock, or CERCLA area in the SDA	Disposal in the SDA.

Waste Stream Description	Expected Type(s)	Storage or Staging Location	Planned Disposition
Facility structural components (e.g., building liners, trusses, and foundation blocks) from decommissioning and demolition (Significant amounts are not expected until Phase 3.)	CERCLA	Retrieval enclosure, airlock, or CERCLA area in the SDA	Disposal in the SDA.
Compressed gas cylinders	Not applicable	Retrieval enclosure, airlock, or CERCLA area in the SDA	For contaminated cylinders, ensure cylinder is depressurized, remove valve assembly, and dispose of in the SDA if determined nonhazardous.
EcoSafe (hydraulic) and other fluids resulting from maintenance Note: EcoSafe is a nonhazardous synthetic lubricant that is used in retrieval equipment.	CERCLA	Retrieval enclosure, airlock, or CERCLA area in the SDA Interim storage in a CERCLA area	Disposal at ICDF; Energy Solutions, LLC, of Utah; or other suitable or licensed disposal facility (Note: May require solidification at the project site before transfer to ICDF).
Personal protective equipment waste from maintenance and operations (e.g., cotton gloves)	Industrial waste	Clean waste receptacles	INL Landfill Complex after survey release.
Used parts from maintenance	Industrial waste	Clean waste receptacles	INL Landfill Complex after survey release.
Administrative waste (e.g., paper, tape, and pens)	Industrial waste	Clean waste receptacles	INL Landfill Complex after survey release.
Light bulbs	Industrial waste or universal waste	Clean waste receptacles or RWMC accumulation area for universal waste bulbs	INL Landfill Complex or INL contract for universal waste disposal.
Batteries	Industrial waste or universal waste	Clean waste receptacles or RWMC accumulation area for batteries if universal waste	INL Landfill Complex or INL contract for universal waste disposal.
Uncontaminated construction debris—metals	Industrial waste	Near a targeted waste retrieval area	Recycling or INL Landfill Complex.

Waste Stream Description	Expected Type(s)	Storage or Staging Location	Planned Disposition
Uncontaminated construction debris—other materials (e.g., wood, plastics, and paper)	Industrial waste	Construction debris dumpster	Recycling or INL Landfill Complex.
Spill waste—hazardous materials	Hazardous waste	RWMC CERCLA storage	INL contract for hazardous waste disposal.
Waste zone material	Mixed transuranic waste	WMF-698 or approved CERCLA area, including cargo containers	Disposal at WIPP.
Waste zone material	Mixed low-level waste	WMF-698 or approved CERCLA storage area, including cargo containers	May require treatment and disposal at other on-INL or off-INL Site facilities, as appropriate, depending on waste stream characterization.
Waste zone material	Nontransuranic unaltered sample material not composed of targeted waste	WMF-698 or approved CERCLA area, including cargo containers	Disposal in the SDA.
Camera equipment and other equipment containing circuit boards	Mixed low-level waste	CERCLA area	Disposal Energy Solutions, LLC, of Utah; or other approved off-INL Site disposal facilities.
Batteries (e.g., lead-acid batteries)	Mixed low-level waste	Retrieval enclosure, airlock, or CERCLA area in the SDA CERCLA area outside of retrieval structures	Disposal at Energy Solutions, LLC, of Utah or other suitable or licensed facility.
Spill waste—nonhazardous fluid spills within the retrieval enclosure (e.g., hydraulic fluids that leak from the excavator/telescopic forklift inside the retrieval structure)	Not applicable	Not applicable	Nonhazardous fluid spills will be allowed to absorb into the soil if released within the retrieval enclosure. Other fluid spills will be cleaned up as practicable as part of ongoing operations and included in the waste stream or processed for disposal at an appropriate facility (i.e., not to remain in the SDA).

Waste Stream Description	Expected Type(s)	Storage or Staging Location	Planned Disposition
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act		
ICDF	Idaho CERCLA Disposal Facility		
INL	Idaho National Laboratory		
RCRA	Resource Conservation and Recovery Act		
RWMC	Radioactive Waste Management Complex		
SDA	Subsurface Disposal Area		
WIPP	Waste Isolation Pilot Plant		

The planned disposition of the demolition waste includes disposal to the extent practicable within an ARP retrieval area. Any remaining demolition waste that is not practicable to dispose within an ARP retrieval area will be placed elsewhere within the SDA and will be covered with pit run soils. The structure fabric will be disposed in such a manner so as to prevent it from becoming either a moisture barrier or vapor trap. Geographical Information System (GIS) data on disposal locations for the structural steel and fabric will be recorded in project completion records and transmitted to the OU 7-13/14 Environmental Restoration program.

The decommissioning of the ARP facilities will be managed in accordance with the general applicable or relevant and appropriate requirements (ARARs) identified in Table 2 of the Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project (DOE/ID-11293) and site-specific ARARs (see Table 1-2) from the Phase 1 Remedial Design/Remedial Action Work Plan for Operable Unit 7-13/14 (DOE/ID-11389) tables A-1, A-2, and A-3 as applicable to general decommissioning activities.

Table 1-2 Chemical, location, and action specific applicable or relevant and appropriate requirements for general decommissioning of the ARP facilities.

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
1	Idaho Toxic Air Pollutants	IDAPA 58.01.01.5 85 IDAPA 58.01.01.5 86	A	Estimation of toxic air pollutant emissions is performed consistent with the process outlined in IDAPA 58.01.01.203 (“Permit Requirements for New and Modified Stationary Sources”) and IDAPA 58.01.01.210 (“Demonstration of Preconstruction Compliance with Toxic Standards”). Through the use of the U.S. Environmental Protection Agency-approved computer model ISCST3 (or other approved model), verification of compliance with toxic air pollutant standards is required before start of excavation activities.
2	Idaho Ambient Air Quality Standards for Specific Air Pollutants	IDAPA 58.01.01.5 77	A	Estimation of criteria pollutant emissions must be performed consistent with the process outlined in IDAPA 58.01.01.203 and IDAPA 58.01.01.203.02 (“National Ambient Air Quality Standards”). Accelerated Retrieval Projects II and III air emissions analysis did not assess diesel emissions because requirements do not apply to excavators and telehandlers used to support operations (i.e., nonroad engines). Similarly, diesel emissions will not be assessed for retrievals following Accelerated Retrieval Project III.
3	National	40 CFR	A	Radionuclide emissions, the abated effective dose

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
	Emission Standards for Emissions of Radionuclides Other Than Radon from DOE Facilities	61.92 through 94, Subpart H		<p>equivalent (EDE) for the INL Site maximally exposed individual, and the unabated EDE for the INL Site maximally exposed individual were determined using the U.S. Environmental Protection Agency-approved computer model CAP-88.</p> <p>The abated EDE to the INL Site maximally exposed individual from operations associated with targeted waste retrievals is far lower than the 40 CFR 61.92 standard of 10 mrem/yr.</p> <p>Per 40 CFR 61.93, sources with unmitigated potential emissions determined to equal or exceed 0.1 mrem/yr must be continuously monitored. Per CAP-88 modeling, the unabated EDE to the INL Site maximally exposed individual is estimated to exceed this value for targeted waste retrievals; thus, continuous air monitoring is required. In accordance with 40 CFR 61.93, all radionuclides that could contribute greater than 10% of the potential EDE must be monitored. For releases from targeted waste retrievals, Am-241, Pu-239, and Pu-240 will be continuously monitored. Ambient monitoring will be implemented in accordance with 40 CFR 61.93(g) as an alternative to monitoring radionuclide emissions from retrieval enclosure stacks.</p>
4	National Historic Preservation Act of 1966	16 USC 470 et seq., 2006	RA	The SDA is identified as a disturbed area with prior clearance; therefore, it is expected that ARARs associated with the National Historic Preservation Act will not require implementation. In the event that archaeological remains are encountered during overburden removal, specific requirements will be evaluated to determine the appropriate action required to comply with the National Historic Preservation Act through coordination with INL cultural resources office personnel. In addition, the requirements must be satisfied for any support activities that are conducted outside of the SDA fence (i.e., in areas not previously disturbed).
5	Idaho Control of Fugitive Dust Emissions	IDAPA 58.01.01.6 50 IDAPA 58.01.01.6 51	A	Fugitive dust emissions during construction and operational activities are controlled by the use of dust suppressant or water, as needed, to reasonably control fugitive dust.
6	Hazardous Waste Determination	IDAPA 58.01.05.0 06 (40 CFR 262.11)	A	A Hazardous Waste Determination, performed by Waste Generator Services, for waste generated under Phase 1 will be documented in accordance with ICP MCPs. Sampling and analysis will be performed, if required.
7	Standards for Owners and Operators of	IDAPA 58.01.05.0 08		<p>(See items that follow.)</p> <p>Note: Requirements of 40 CFR 264, Subpart I, do not</p>

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
	Treatment, Storage, and Disposal Facilities—Use and Management of Containers	(40 CFR 264, Subpart I)		apply to containers staged in the SDA before characterization assay is performed, transfer to the AMWTP, or transfer to a formal CERCLA storage area.
7a	Condition of Containers	IDAPA 58.01.05.008 (40 CFR 264.171)	A	<p>All stored waste will be in new containers. Weekly inspections of CERCLA storage areas will be performed in accordance with INL Site MCPs. A modified inspection approach is required for CERCLA waste stored in a modified dense pack arrangement as discussed directly below.</p> <p>The following requirements apply only to waste stored in a modified dense pack arrangement:</p> <ul style="list-style-type: none"> • A weekly inspection for leaks and spills will be performed by an inspector walking around the perimeter of the container rows. Additionally, weekly radiological surveys (e.g., swipes, instrument monitoring) will be performed on any suspected leak/spill or any container observed with damage that could impact container integrity. If leaks/spills and/or radiological contamination are found, then corrective action will be performed on a timely basis. • A quarterly inspection will be performed by visually inspecting for any liquid present on or near the containers and for signs of defective, visibly pitted, metal-fatigued, or deteriorated containers. This inspection will be performed around the perimeter of the container rows and through each aisle in between the rows of containers.
7b	Compatibility of Waste with Containers	IDAPA 58.01.05.008 (40 CFR 264.172)	A	Containers used in all CERCLA storage areas will be compatible with the types of waste managed.
7c	Management of Containers	IDAPA 58.01.05.008 (40 CFR 264.173)	A	<p>Containers being stored will be kept closed at all times, except when adding or removing waste. Vented containers are considered closed, if vents are installed per the manufacturer's recommendations. In general, all transuranic waste containers stored in the CERCLA storage areas are vented.</p> <p>Containers will be managed in such a way to prevent conditions that may rupture the container or cause it to leak.</p> <p>The following criteria apply only to waste stored in a modified dense pack arrangement:</p>

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
				<ul style="list-style-type: none"> • Quarterly inspections will be performed to verify that containers are positioned properly and properly located in the storage configuration. • Rows of drums in WMF-698 are no more than 4 drums wide by 5 drums high by 28 in length. • Aisle spacing requirements will be maintained.
7d	Inspections	IDAPA 58.01.05.008 (40 CFR 264.174)	A	At least weekly, inspections of the area where containers are stored will be performed. For additional information on inspections being performed, see items numbered 7a, 7c, 7e, 9, 11b, 11c, and 11e.
7e	Containment	IDAPA 58.01.05.008 (40 CFR 264.175)	A	<p>In general, if free liquids are retrieved and sent with waste to the waste processing drum packaging station, then the free liquid will be observed during the visual examination and absorbed. If containerized free liquids are stored in the CERCLA storage areas, then portable secondary pallets/pans will be used for those containers. Containment pallets/pans must have the capacity to contain a minimum of 10% of the volume of the containers located on the spill pallet/pan or the volume of the largest container, whichever is greater. Metal standard waste boxes that satisfy the preceding substantive criteria may be used, as needed. If used, steps will be implemented to ensure drums are elevated to prevent contact with potential accumulated liquids. Containerized free liquids (i.e., retrieved waste) will not be stored outdoors in unenclosed areas. Note that some free liquids from secondary waste streams (e.g., hydraulic fluids, diesel, oils) will be generated and will be stored on spill pallets for containment, as needed. If stored outside, this secondary waste will be covered with tarps, as appropriate.</p> <p>Monthly inspections of the spill pallets/pans will be performed, looking for evidence of significant cracks and gaps that may compromise the integrity of the containment. Weekly visual inspections also will be performed to verify that no liquid is present in the containment system of the spill pallet/pan.</p>
7f	Special Requirements for Ignitable or Reactive Waste	IDAPA 58.01.05.008 (40 CFR 264.176)	A	The facility boundary line is defined as the INL Site boundary. The RWMC is 3 miles from the southern INL Site boundary, which is the closest boundary to RWMC. Therefore, the waste stored in the storage units is more than 15 m (50 ft) from the INL Site boundary.

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
7g	Special Requirements for Incompatible Wastes	IDAPA 58.01.05.008 (40 CFR 264.177)	A	In general, incompatible wastes are not stored in the CERCLA storage areas. In the event that incompatible wastes are stored, then containers holding incompatible wastes will be separated by distance (i.e., located in separate rows) if the wastes contain no free liquids. If the incompatible wastes contain free liquids, then the wastes will be segregated through use of separate spill pallets/pans.
8	General Waste Analysis	IDAPA 58.01.05.008 (40 CFR 264.13(a)(1) and (a)(2))	A	Chemical and physical characterization will be performed for retrieval area waste, per a set sampling regime via the WIPP-approved procedures and use of AK. The AK will consist of information gathered from the generating facility, and information from past retrieval activities (e.g., Glovebox Excavator Method and Transuranic Storage Area) will also be used for waste generated from similar processes. Additional sampling and analysis will be performed, if required.
9	General Inspection Requirements	IDAPA 58.01.05.008 (40 CFR 264.15(a) and (c))	A	<p>Inspections of the areas where containers are stored will be performed on items (e.g., malfunctions and deterioration) that may cause or lead to (1) releases of hazardous waste constituents to the environment or (2) a threat to human health. Following completion of all inspections, any identified problems requiring further action are corrected on a timely basis.</p> <p>For additional information on inspections being performed, see items numbered 7a, 7c, 7e, 9, 11b, 11c, and 11e.</p>
10	General Requirements for Ignitable, Reactive, or Incompatible Waste	IDAPA 58.01.05.008 (40 CFR 264.17(a), (b), and (c))	A	<p>Open flames, cutting, welding, or other similar spark or ignition sources are not allowed within the CERCLA storage areas unless repair is required of a piece of equipment, in which case the equipment and the open flame or spark source are isolated to the extent feasible from the waste in storage. Additionally, smoking is not allowed inside of the CERCLA storage areas.</p> <p>Incompatible wastes, if placed into the CERCLA storage areas, are segregated as discussed earlier.</p> <p>Routine inspections of the CERCLA storage areas provide regular assessment of storage conditions and early identification of potentially hazardous situations.</p> <p>Malfunctioning equipment is tagged and either locked out or isolated.</p> <p>Waste is stored in containers that are kept closed at all times, except when adding or removing waste.</p>

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
11	Preparedness and Prevention	IDAPA 58.01.05.008 (40 CFR 264, Subpart C)		(See items that follow.)
11a	Design and Operation of Facility	IDAPA 58.01.05.008 (40 CFR 264.31)	A	Targeted waste retrieval buildings are designed, constructed, maintained, and operated in such a manner as to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste constituents to the air, soil, or surface water that could threaten human health or the environment.
11b	Required Equipment	IDAPA 58.01.05.008 (40 CFR 264.32)	A	<p>Two-way radios or cell phones will be used by personnel such that immediate emergency instructions may be given to all affected personnel. The two-way radios or cell phones also will be used to summon emergency assistance from local police departments, fire departments, and/or state or local emergency response teams. A two-way radio or cell phone will be worn by at least one member of the entry team during all entries into the CERCLA storage areas.</p> <p>A minimum of four portable fire extinguishers will be present within WMF-698, one extinguisher located in the vicinity of each personnel access door. A monthly inspection will be performed to ensure that fire extinguishers are in the proper location, are easily accessible, and show no evidence of damage or tampering.</p> <p>A minimum of one set of spill control equipment will be present in WMF-698. If only solid waste is being stored within WMF-698, then the spill control equipment will consist of a shovel, broom, plastic bag(s), and overpack container. If containerized free liquids are stored, then an absorbent material also will also be part of the spill control equipment in addition to the items required for solid waste storage. A monthly inspection will be performed to verify the presence of the spill control equipment and the contents of the equipment. Any spill control equipment needed for separate CERCLA waste storage areas (i.e., other than WMF-698) will be as specified in Appendix L of the ICP Emergency Plan (PLN-2012).</p> <p>Water at adequate volume and pressure is available for targeted waste retrieval buildings via fire hydrants to supply water hose systems.</p>

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
11c	Testing and Maintenance of Equipment	IDAPA 58.01.05.008 (40 CFR 264.33)	A	All communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, will be tested per a set schedule to ensure their proper operation in the event of an emergency. Equipment will be maintained per manufacturers' recommendations, per regulatory requirements, or based upon a reliability-centered maintenance program.
11d	Access to Communications or Alarm Systems	IDAPA 58.01.05.008 (40 CFR 264.34)	A	Whenever hazardous waste is being managed at targeted waste retrieval facilities, immediate access to an emergency communication device (e.g., two-way radio or cell phone) will be available. See Item 11c for additional information on the use of two-way radios.
11e	Required Aisle Space	IDAPA 58.01.05.008 (40 CFR 264.35)	A	WMF-698 will be inspected quarterly to ensure that a minimum of 0.9 m (3 ft) of aisle space is maintained between rows of containers and between the rows and all internal and external walls. Additionally, a minimum of 6.1 m (20 ft) will be maintained for the center access aisle. Alternate storage configuration may be required for special-case waste storage, such as incompatible waste or waste with criticality considerations.
12	Land Disposal Restrictions—Treatment Standards	IDAPA 58.01.05.011 (40 CFR 268.40, 40 CFR 268.44, 40 CFR 268.45, 40 CFR 268.48, and 40 CFR 268.49)	A	Waste disposed of at WIPP is not required to meet the land disposal restriction, given that WIPP has been granted a no migration variance. Waste profiles will be developed for any waste disposed of at other disposal facilities and will be treated to meet the appropriate treatment standards, as applicable.
13	Polychlorinated Biphenyls Storage and Disposal	40 CFR 761	A	In the event that PCB contamination at 50 ppm or greater is generated, it may be stored in WMF-698 (and additional functionally equivalent storage areas in the SDA) in accordance with the risk-based storage approval documented in Appendix C of this Work Plan. Additional substantive TSCA requirements (e.g., container labeling, waste characterization [see text below and Section 4.6.7], and disposal requirements) are applicable and will be met for relevant waste streams generated as part of OU 7-13/14.

Item	ARAR or TBC	Regulatory Citation	Relevancy ^a	Implementation of Applicable or Relevant and Appropriate Requirement Description
14	Radioactive Waste Management	DOE O 435.1 Chg 1	TBC	The requirements of DOE O 435.1 Chg 1 are implemented by use of various MCPs for the INL Site.
a. Relevancy refers to the type of requirement: A = applicable, RA = relevant and appropriate, TBC = to-be-considered advisories, guidance, and other information.				
AK	acceptable knowledge			INL Idaho National Laboratory
AMWTP	Advanced Mixed Waste Treatment Project			MCP management control procedure
ARAR	applicable or relevant and appropriate requirement			OU operable unit
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act			PCB polychlorinated biphenyl
CFR	Code of Federal Regulation			RWMC Radioactive Waste Management Complex
DOE	U.S. Department of Energy			SDA Subsurface Disposal Area
EDE	effective dose equivalent			TBC to be considered
ICP	Idaho Cleanup Project			TSCA Toxic Substances Control Act
IDAPA	Idaho Administrative Procedures Act			USC United States Code
				WIPP Waste Isolation Pilot Plant

A geotechnical evaluation of the compatibility of the placement of the ARP IV structural steel within the SDA with respect to the long term performance and stability of the final end state for OU 7-13/14 was prepared as a result of an April 2011 meeting of the CERCLA Agencies when that facility was being considered for D&D. The conclusion of that evaluation was that placement of the structural steel over Pit 5 within ARP IV was not likely to cause a significant impact (either positive or negative) to the long term performance of the final cap. That evaluation was submitted separately to the Agencies. This evaluation is considered conservative and applicable to the placement of structural steel from all of the ARP facilities for the demolition waste to be placed anywhere within the SDA boundaries that will be covered by the final cap.