



Department of Energy

Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, ID 83415

April 9, 2012

Mr. Dennis Faulk
INL Program Manager
US EPA Region 10- Hanford Project Office
309 Bradley Blvd, Suite 115
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-12-027)

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 facilities related to the Process Equipment Waste Evaporator (PEWE), Liquid Effluent Treatment & Disposal facility, New Waste Calcining Facility, Idaho Nuclear Technology and Engineering Center (INTEC) main stack, and misc. remaining structures within the INTEC Tank Farm 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 INL buildings and structures with similar characteristics, contaminants, and complexity to those 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 list of structures identified for addition to Table 1 is enclosed. These surplus (or soon to be surplus) structures and buildings may contain hazardous substances to which if no action was taken and surveillance and maintenance activities ceased, these structures would present the same threat to public health, welfare, and the environment as those structures presently identified in Table 1 of the Action Memorandum. These structures are located within the INTEC facility and were used to treat or facilitate the treatment of radioactive liquid waste primarily generated within the INTEC facility that are already listed in Table 1 of the Action Memorandum. As such, the list of major contaminants is expected to be essentially identical. The decommissioning of these structures will be similar in nature to the decommissioning for the Fuel Reprocessing Complex which has recently been completed under this General Action Memo at INTEC.

Specifically, the CPP-604 Waste Building and the CPP-659 New Waste Calcining Facility are considered major facilities for which the D&D General Action Memorandum does not determine final end state. A facility specific Engineering Evaluation/Cost Analysis and subsequent Action Memorandum will be prepared for these facilities that will determine the final end state. Actions preparatory to decommissioning will be conducted under the D&D General Action Memorandum until such time as the facility specific Action Memorandums are approved. Some of the minor facilities will be addressed in facility specific EE/CA due to the proximity and interrelatedness of adjacent facilities to the major facilities. CPP-605 Blower Building, CPP-649 Atmospheric Protection Building, and CPP-756 Prefilter Vault will be addressed in conjunction with the EE/CA for the CPP-604 Waste Building. The CPP-1659 Contaminated Equipment Maintenance Building will be addressed in conjunction with the EE/CA for the CPP-659 New Waste Calcining Facility. Facilities or structures not addressed in a facility specific EE/CA will be removed to grade or slightly below

Several of these buildings are currently permitted under HWMA/RCRA as treatment and storage facilities for mixed waste. Closure plans are being developed to comply with HWMA/RCRA closure standards. To the extent practicable, the HWMA/RCRA closure of these facilities will be integrated with the non-time critical removal actions for these facilities. Waste generated during the closure and D&D of these facilities will be managed in accordance with the

Mr. Faulk
Mr. Koch

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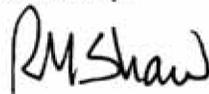
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appropriate closure plan (as applicable) and with the ARARs of the D&D General Action Memorandum or the facility specific Action Memorandums.

Please note that these facilities are located within CERCLA Operable Unit 3-14 Industrial Use Area as well as within the OU 3-13 area of contamination. As such, anticipated waste disposal will primarily be at the Idaho CERCLA Disposal Facility for radioactive wastes or INTEC CERCLA Demolition Waste Landfill for non-radioactive non-hazardous waste.

The Idaho Cleanup Project concludes that the structures identified in this addenda request are sufficiently similar in characteristics, contaminants, and complexity to those previously included in Table 1 of the Action Memorandum, and are appropriate for inclusion under the scope of the NTCRA. Upon receipt of your concurrence with this determination, this letter and attachment 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

UFC: 6000
Disposition Authority: A16-1.5-a
EM-FMDP-12-027

ID DISTRIBUTION:

Email to: ! DOE-ID Admin Support
SHAW, ROBERT M
Whitham
Contreras
Hain
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) to DEQ and EPA and requests their concurrence.
2. This letter was written by Mark Shaw. *DMS*
3. This letter/memo closes Pegasus number N/A
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
INTEC Structures including PEWE, LET&D, NWCF, TFF, and Main Stack

The INTEC facilities/structures to be included are the Process Equipment Waste Evaporator, Liquid Effluent Treatment & Disposal facility, New Waste Calcining Facility, Tank Farm Facility miscellaneous above grade structures, and the INTEC Main Stack. Specific buildings and structures included are listed in Table 1. Miscellaneous structures within the INTEC tank farm and minor structures supporting the above listed facilities will also be removed under the General D&D Action Memorandum (DOE/ID-11293). See Figure 1 for facility locations and Figures 2 through 5 for facility pictures. The primary purpose of these structures was to safely treat the radioactive liquid waste generated at the INTEC facility primarily from the fuel reprocessing operations. The removal of these structures supports the overall DOE goal of footprint and risk reduction.

Table 1. Addenda to List of Buildings and Structures

INL Structure ID	Name/Description	Major Facilities	Minor Facilities
CPP-604	Rare Gas Plant/Waste Building	X	
CPP-605	Blower Building		X
CPP-649	Atmospheric Protection Building		X
CPP-756	Prefilter Vault		X
CPP-1773	Load Center #13		X
CPP-1618	Liquid Effluent Treatment & Disposal		X
CPP-659	New Waste Calcining Facility	X	
CPP-1659	Contaminated Equipment Maintenance Building		X
CPP-708	INTEC Exhaust Stack		X
CPP-692	Waste Stack Monitor System		X
CPP-636	Waste Station WM-189-190		X
CPP-628	Tank Farm Control House		X
CPP-1781	Misc. TFF above grade structures		X

Table 2. Buildings and Structures Footprint/Area

INL Structure ID	Structure	Footprint/Area
CPP-604	Rare Gas Plant/Waste Building	21,175 ft ²
CPP-605	Blower Building	3,436 ft ²
CPP-649	Atmospheric Protection Building	4,825 ft ²
CPP-756	Prefilter Vault	3,672 ft ²
CPP-1773	Load Center #13	300 ft ²
CPP-1618	Liquid Effluent Treatment & Disposal	5,845 ft ²
CPP-659	New Waste Calcining Facility	84,080 ft ²
CPP-1659	Contaminated Equipment Maintenance Building	1,846 ft ²
CPP-708	INTEC Exhaust Stack	200 ft ² (243 ft high)
CPP-692	Waste Stack Monitor System	663 ft ²
CPP-636	Waste Station WM-189-190	363 ft ²
CPP-628	Tank Farm Control House	1552 ft ²
CPP-1781	Misc. TFF above grade structures	Fenced 4 acre area

The decommissioning of these structures is similar in nature to the decommissioning of the Fuel Reprocessing Complex at INTEC that included CPP-601, CPP-627, and CPP-640. The majority

of the waste treated in the facilities proposed to be added to the list were generated within the Fuel Reprocessing Complex. As such the major contaminants are expected to be nearly identical.

The CPP-604 Waste Building and the CPP-659 New Waste Calcining Facility are considered major facilities for which the D&D General Action Memorandum does not determine final end state. A facility specific Engineering Evaluation/Cost Analysis and subsequent Action Memorandum will be prepared for these facilities that will determine the final end state. Some of the minor facilities will be addressed in a facility specific EE/CA due to the proximity and interrelatedness of adjacent facilities to the major facilities. CPP-605 Blower Building, CPP-649 Atmospheric Protection Building, and CPP-756 Prefilter Vault will be addressed in conjunction with the EE/CA for the CPP-604 Waste Building. The CPP-1659 Contaminated Equipment Maintenance Building will be addressed in conjunction with the EE/CA for the CPP-659 New Waste Calcining Facility. Actions preparatory to decommissioning will be conducted under the D&D General Action Memorandum until such time as the facility specific Action Memorandums are approved. Facilities or structures not addressed in a facility specific EE/CA will be removed to grade or slightly below.

Several of these buildings are currently permitted under HWMA/RCRA as treatment and storage facilities for mixed waste. Closure plan are being developed to comply with HWMA/RCRA closure standards. To the extent practicable, the HWMA/RCRA closure of these facilities will be integrated with the non-time critical removal actions for these facilities. Waste generated during the closure and D&D of these facilities will be managed in accordance with the appropriate closure plan (as applicable) and with the ARARs of the D&D General Action Memorandum or the facility specific Action Memorandums.

These facilities are located within CERCLA Operable Unit 3-14 Industrial Use Area as well as within the OU 3-13 area of contamination. As such anticipated waste disposal will primarily be at the Idaho CERCLA Disposal Facility for radioactive wastes or INTEC CERCLA Demolition Waste Landfill for non-radioactive non-hazardous waste. Specific wastes that are removed from the facility such as lead bricks, polychlorinated bi-phenyls, and lubricants will be sent to appropriate non-CERCLA facilities such as a RCRA TSDF.

There have been three areas of release beneath CPP-604 and CPP-649 that are classified as CERCLA sites under OU 3-13 as Group 2 sites (CPP-87, CPP-89, and CPP-111). The selected remedy in the OU 3-13 ROD for Group 2 sites was deferred action until the facilities were deactivated and decommissioned. The EE/CA for CPP-604 that will also address CPP-605, CPP-649, and CPP-756 will include these sites in the evaluation of risk and possible alternatives. The Action Memorandum for this facility will select the remedy that is expected to complete actions under CERCLA for these sites. Because these facilities are located within the OU 3-14 designated Industrial Use Area, institutional controls will continue to be applied to this area for the foreseeable future.

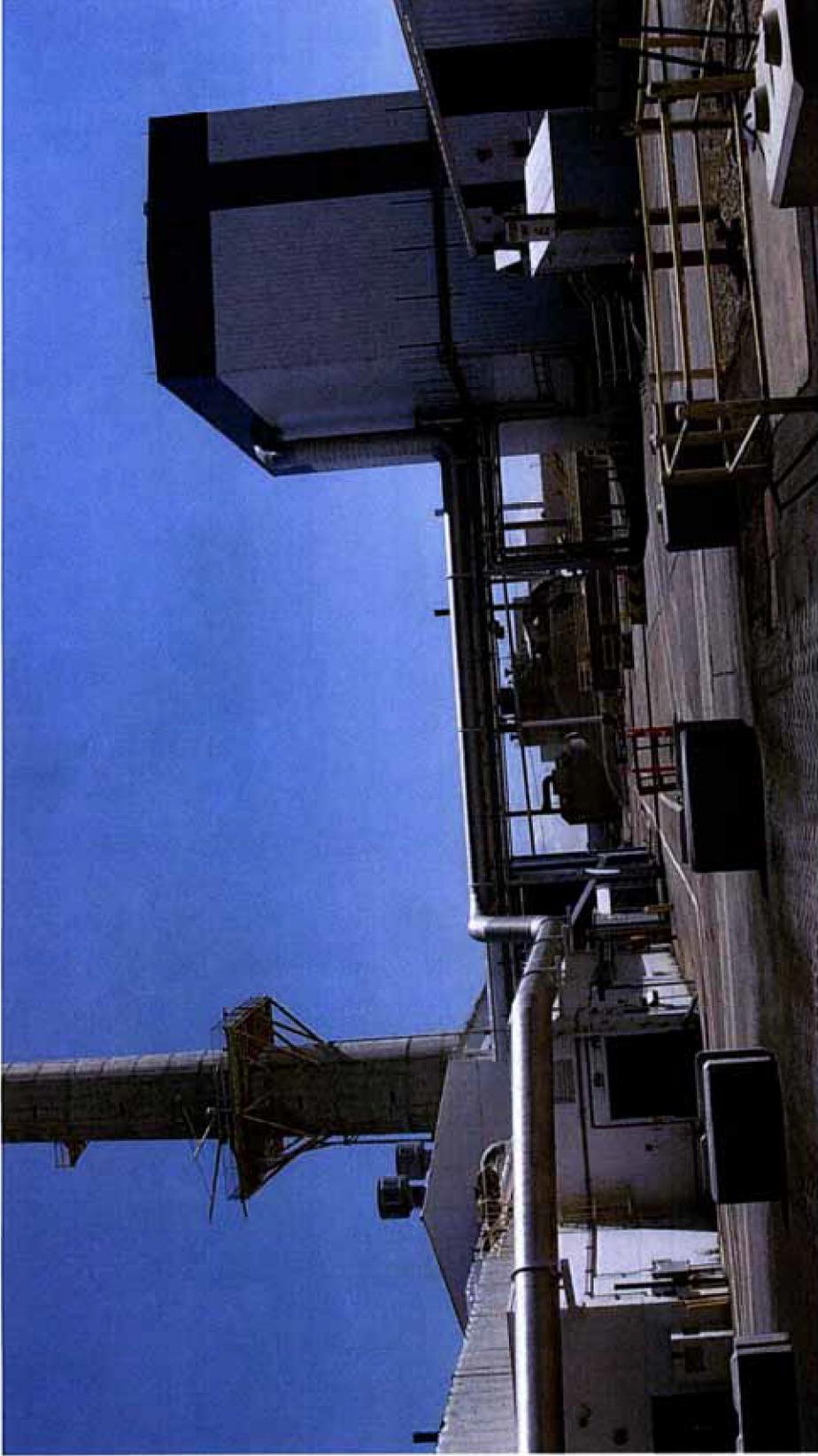


Figure 2. Photograph of PEWE, INTEC Stack, and LET&D



Figure 3. Photograph of NWCF from the INTEC stack.



Figure 4. Photograph of Tank Farm Facility from INTEC stack.