



Department of Energy

Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

March 14, 1991

Mr. R. P. Donovan, Director
Office of the Director
Idaho Department of Health and Welfare
450 West State Street
Boise, Idaho 83720

SUBJECT: Notification of Modification of Part A Permit for the INEL -
ERD-075-91

Dear Mr. Donovan:

The Department of Energy, Idaho Operations Office, wishes to inform you that we will soon be requesting a modification of our RCRA interim status permit. The modification is to reclassify a number of the INEL units currently designated as Land Disposal Units (LDUs) under terms of the Consent Order and Compliance Agreement (COCA). Only those past operations/activities identified as COCA LDUs on an attachment to the INEL RCRA Part A permit application are affected. A request for revision of the COCA list is being made to EPA Region 10 under separate cover.

The reclassification of COCA LDUs is based on two changes or clarifications to EPA policy and guidance and on additional information obtained since signature of the COCA. The first change or clarification concerns EPA's draft rules regarding "Corrective Actions for Solid Waste Management Units at Hazardous Waste Management Facilities" published in 55 FR 30798. The proposed rules define a SWMU as "any discernible unit at which solid wastes have been placed at anytime, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released." The second change concerns EPA's clarification of their use of July 3, 1986, as the effective date for the RCRA regulation of radioactive mixed wastes.

We believe this permit modification will qualify as a Class 1 modification, meeting the definition of an "administrative and informational change" under General Permit Provisions of Appendix I to 40 CFR 270. As a Class 1 modification not requiring prior Agency approval, our responsibilities are to provide you notification and supporting documents within 7 days after making the change and to notify everyone on the INEL facility mailing list within 90 days of making the change. However, to date, only information on LDUs located at the Idaho Chemical Processing Plant (ICPP) has been gathered and reviewed in sufficient detail to allow a reclassification. Similar efforts are now underway with regard to the LDUs located elsewhere on the INEL. We are proposing that all LDU reclassifications be addressed under a single Part A Permit modification as a more efficient approach for both

Mr. R. P. Donavan

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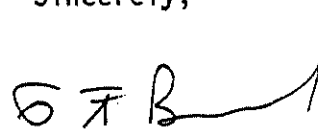
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offices. Therefore, it is requested that this letter be considered as fulfillment of the "7 day" notification requirement for the ICPP units identified for reclassification on the enclosed summary table. This is, of course, with the understanding that a formal permit modification will be forthcoming when the review of other LDU information is complete.

The enclosure to this letter identifies which ICPP-specific units will be reclassified and which will remain as LDUs. Under continued implementation of the COCA, reclassified LDUs would be managed as are other SWMUs. Under terms of the draft CERCLA 120 Interagency Agreement, the reclassified LDUs will be incorporated into CERCLA operable units, and the units still designated as LDUs will remain subject to RCRA closure.

Please feel free to contact Lisa Green at (208) 526-0417 should you have any questions or concerns regarding this notification. Comments regarding the general approach taken which will effect future LDU reclassification efforts would be appreciated at your earliest convenience. Your continued cooperation is appreciated.

Sincerely,



T. F. Burns, Jr.
Deputy Assistant Manager
Environmental Restoration and
Waste Management

Enclosure

cc: D. Rassmussen, EPA

Summary of ICPP LDU Reclassifications

<u>Unit #</u>	<u>Name</u>	<u>Revised Status</u>	
		<u>Non-LDU</u>	<u>LDU</u>
CPP-23	CPP Injection Well	X	
CPP-33	Contaminated Soil in the Tank Farm Area Near WL-102, NE of CPP-604	X	
CPP-34	Soil Storage Area in the NE Corner of the CPP	X	
CPP-37	CPP Gravel Pits #1 and #2	X	
CPP-39	CPP HF Storage Tank (YDB-105) and Dry Well		X
CPP-40	Lime Pit at the Base of the CPP-601 Berm and French Drain	X	
CPP-47	Pilot Plant Storage Area West of CPP-620	X	
CPP-48	French Drain South of CPP-633		X
CPP-55	Mercury Contaminated Area South of CPP-T-15	X	
CPP-59	Kerosene Tank Overflow West of CPP-633	X	
CPP-63	Hexone Spill by CPP-710	X	
CPP-64	Hexone Spill West of CPP-660	X	