IDAHO DEPARTMENT OF HEALTH AND WELFARE

IN THE MATTER OF	)	
	)	
United States Department of Energy	)	**CONSENT ORDER**
Idaho National Engineering & Environmental Laboratory	)	**Idaho Code § 39-4413**

1. PARTIES

The Idaho Department of Health and Welfare (Department) and the United States Department of Energy (DOE), (the Parties), enter into this Consent Order regarding DOE's Idaho National Engineering & Environmental Laboratory (INEEL) located in Butte, Jefferson, Clark, Bonneville, and Bingham Counties near Idaho Falls, Idaho.

2. JURISDICTION

2.1 The Parties enter into this Consent Order pursuant to the Idaho Hazardous Waste Management Act of 1983 (HWMA), as amended, Idaho Code §§ 39-4401, et seq. The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) and the Federal Facility Compliance Act of 1992, requires each department, agency and instrumentality of the federal government engaged in the disposal or management of hazardous waste to comply with all federal and state requirements respecting the control and abatement of hazardous waste. 42 U.S.C. § 6961. DOE, a department of the executive branch of the federal government, owns and operates the INEEL, a nuclear research and development facility.

2.2 The Department administers a hazardous waste management program pursuant to the HWMA and the Idaho Rules and Standards for Hazardous Waste, IDAPA 16.01.05.000 to 05.999. The State of Idaho is authorized, pursuant to RCRA, to administer this hazardous waste management program in lieu of the federal program. 55 Fed. Reg. 11015 (March 26, 1990). DOE generates, transports, stores, treats, and manages hazardous waste at the INEEL and is therefore subject to and must comply with all federal and state requirements respecting hazardous waste, including the HWMA and the Idaho Rules and Standards for Hazardous Waste.

2.3 DOE agrees not to contest the jurisdictional elements of this Consent Order, or to contest the Department's authority to seek enforcement of the terms and conditions of this Consent Order.

3. DEFINITIONS

3.1 Except as otherwise specifically defined herein, the terms used in this Consent Order, including the attached Action Plan, shall have the same meaning as that used in the HWMA and the Idaho Rules and Standards for Hazardous Waste.

3.2 "Covered Matters" are those potential violations specifically identified in the attached Action Plan or subsequently added to the Action Plan pursuant to Section 11.2 of the Consent Order.

3.3 "Deliverable" is a written submittal required to be made to the Department by DOE to document DOE's satisfaction of compliance with the actions identified under the milestone. The deliverable shall be due upon the same date as the milestone with which it is associated. The review and approval procedure for a deliverable is set out in Section 9 of this Consent Order.

3.4 "Milestone" is a fixed date, set in the Action Plan, by which DOE must complete certain actions. Milestones are identified by reference to federal fiscal year quarters. The date of any milestone will be the last day of the quarter identified: the first quarter (1Q) shall have December 31; the second

quarter (2Q) shall have March 31; the third quarter (3Q) shall have June 30; and the fourth quarter (4Q) shall have September 30.

4. COVERED MATTERS AND IMPLEMENTATION OF THE ACTION PLAN

4.1 Beginning in 1996, in a series of telephone calls, meetings, and written submissions, DOE has described factual situations to the Department which may involve violations of HWMA and the Idaho Rules and Standards for Hazardous Waste. Based upon the circumstances of disclosure to the Department and the assumptions described in Section 13.5 of this Consent Order, the Department has decided to exercise its enforcement discretion by not issuing a Notice of Violation or assessing a civil penalty with regard to the potential violations included in this Consent Order as Covered Matters. The attached Action Plan establishes enforceable milestones within which DOE must achieve compliance with regard to the Covered Matters. The Action Plan is incorporated into and made a part of this Consent Order, and is enforceable in the same manner as any other requirement of the Consent Order.

4.2 In order to return to compliance with regard to the Covered Matters, DOE agrees to the provisions of this Consent Order.

4.3 This Consent Order covers three types of Covered Matters, as follows:

1. Covered Matters with Detailed Action Plans (Non-Tiered Milestones). Appendix A of the Action Plan address certain Covered Matters which have specifically identified milestones the completion of which will bring DOE into compliance with regard to the particular Covered Matter.

2. Covered Matters with Tiered Milestones. Appendix B of the Action Plan address certain Covered Matters which have "tiered" milestones identified. The implementation of the tiered milestones shall be conducted pursuant to Section 4.4 of this Consent Order. Interim actions for Covered Matters with tiered milestones will be identified in Appendix B, as appropriate.

3. Covered Matters that Are Closed. Appendix C of the Action Plan lists certain Covered Matters that are closed under the provisions of this Consent Order and the Action Plan. With regard to these Covered Matters, the Department has determined that DOE has taken all actions necessary to resolve any identified issues of potential non-compliance, or is resolving the potential noncompliance through a process outside this Consent Order.

4.4 For Covered Matters with Tiered Milestones included in Appendix B of the Action Plan, completion of the initial milestones will provide DOE and the Department with necessary information to determine if additional action is needed to achieve compliance with regard to the Covered Matter. Department approval of the deliverables required to achieve the initial milestones may not bring these Covered Matters to compliance. With regard to any particular Covered Matter in this category it may be necessary to establish further tiered milestones. To complete the initial milestones for this category of Covered Matters, DOE shall make a determination of whether further action is required and submit it to the Department (along with any relevant supporting information) for review and approval as a deliverable by the date identified in Appendix B. Based upon the information in the deliverable, if DOE determines that:

1. No further action is required and the Department approves that deliverable the Covered Matter shall be transferred to Appendix C of the Action Plan as a closed Covered Matter; or

2. Further action is required, DOE must, within ninety (90) days of the Department's approval of the milestone deliverable, submit a milestone deliverable which includes a description of interim actions, if necessary, along with a proposed schedule of further milestones or

tiered milestones and associated actions to achieve compliance with regard to the Covered Matter.

4.5 Upon the Department's approval of a final deliverable submitted to achieve a milestone which completes the requirements of this Consent Order with regard to a particular Covered Matter, the Covered Matter shall be transferred to Appendix C of the Action Plan as a closed Covered Matter.

5. ANNUAL ACTION PLAN REVISIONS & PROGRESS REPORTS

5.1 Commencing October 31, 2000, and annually on or before every October 31 thereafter, DOE shall submit to the Department, for review and approval, a Progress Report and a revised Action Plan. The period each Progress Report and revised Action Plan shall cover is, inclusively, from October 1 of the preceding calendar year through September 30 of the calendar year the submittal is made (federal fiscal year).

5.2 The Progress Report shall summarize, in narrative form, the activities taken to implement the Consent Order over the previous federal fiscal year. The Report shall identify any issues that have affected or may affect DOE's compliance with the Consent Order requirements, including compliance with milestones. The Progress Report shall also identify and describe any pending notifications or requests for extensions under Section 7 of this Consent Order, the status of any deliverables pending review, comment, approval, modification, revision, or other action under Section 9 of this Consent Order, and the consequences of any extensions sought or obtained.

5.3 The revised Action Plan shall specifically incorporate all actions taken during the relevant period including but not limited to: the transfer of Covered Matters within the Action Plan pursuant to Section 4; the removal of Covered Matters from the Consent Order pursuant to Sections 9.5.5 or 13.5; the addition of tanks to the Covered Matters pursuant to Section 7.5; or the extension of any milestones or other deadlines pursuant to Section 7 or Section 9.6.

5.4 The requirement to submit an annual Progress Report and revised Action Plan shall not change or alter in any manner the notification requirements of Section 7.1 of this Consent Order, any notification requirements to which DOE is subject pursuant to any other order, agreement or applicable law, or the requirements of this Consent Order with regard to the addition, removal, or closure of Covered Matters or the revision of milestones or other Consent Order requirements, terms and conditions.

6. STIPULATED PENALTIES

6.1 Unless and until the Department has granted DOE an extension pursuant to Section 7 of this Consent Order, DOE hereby stipulates and agrees that, if DOE fails to complete on time any milestone required by this Consent Order, or if the Department disapproves a deliverable pursuant to Section 9.5 of this Consent Order, DOE shall be subject to a stipulated penalty of one thousand dollars ($1,000) for each violation for each day that DOE fails to achieve compliance with the requirement violated.

6.2 For the Department to recover a stipulated penalty from DOE for matters covered by this Consent Order, the Department must give DOE written notice of the alleged violation for which the Department seeks a penalty. The notice shall describe the alleged violation and demand payment of the penalty. Upon receipt of such notice from the Department, DOE shall reply in writing within seven (7) days. The reply shall: (a) explain the reason for the alleged violation and the proposed means and time required to remedy the same; or (b) state why DOE believes the Department's claim is invalid. The Department shall thereafter respond to DOE's reply by notifying DOE whether DOE

must pay the stipulated penalty. Any stipulated penalty shall be paid by DOE to the Department within sixty (60) days of DOE's receipt of the Department's final response, except as otherwise provided for or limited by law.

6.3 All stipulated penalties shall begin to accrue upon the day a violation occurs and shall continue to accrue through the day (a) the violation is corrected or the Consent Order requirement is met, or (b) DOE receives written notice from the Department that the relevant Covered Matter is withdrawn from the scope of this Consent Order pursuant to Section 9.5.5 or 13.5, whichever comes first.

6.4 Nothing shall prevent the simultaneous accrual of separate stipulated penalties for separate violations of this Consent Order.

6.5 The payment of stipulated penalties shall not alter in any way DOE's obligation to complete the performance of this Consent Order. DOE recognizes that failure to comply with the terms of this Consent Order, or any of the statutes or regulations upon which it is based, may result in an action for any relief available to the Department. The Department reserves its right to assess monetary penalties under the HWMA in lieu of stipulated penalties for violations of this Consent Order for either the entire duration or a discrete portion of the duration of the violation.

6.6 If required, payment shall be made by electronic transfer of funds or by check payable to the Idaho Department of Health and Welfare and sent to the following address:

Accounts Receivable
Financial Management Services Division
Idaho Division of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706-1255

7. EXTENSIONS, MODIFICATIONS, AMENDMENTS

7.1 If any event occurs that causes, or may cause, delay in the achievement of any milestone or other requirement of this Consent Order, DOE shall notify the Department in writing within ten (10) days of the date DOE knew, or reasonably should have known, of the event. Any notice under this Section shall describe in detail the anticipated length of the delay, the precise cause or causes of the delay, all the anticipated consequences of the delay, measures taken by DOE to prevent or minimize the delay, and a timetable by which those measures will be implemented. DOE shall utilize all reasonable measures to avoid or minimize any such delay. If the Department determines that the delay, or anticipated delay, in achieving any of the requirements of this Consent Order has been, or will be, caused by circumstances beyond the reasonable control of DOE, the Department will grant an extension for a period equal to the length of the delay caused by such circumstances. The burden of proving that any delay is caused by circumstances beyond the reasonable control of DOE shall rest wholly with DOE.

7.2 In addition to situations covered in other sections of this Consent Order, DOE may request, for good cause and in writing, an amendment of this Consent Order, or a modification of the Action Plan, including the extension of a milestone.

7.3 If DOE submits a request pursuant to Sections 7.1 or 7.2, the Department shall notify DOE of its determination within thirty (30) days of receipt of the request of the Department's decision whether to grant the request. If the Department does not respond to DOE's request within thirty (30) days, the request shall be deemed denied.

7.4 A timely and good faith request for an extension pursuant to Sections 7.1 or 7.2 shall toll any accrual of stipulated penalties with regard to the affected milestone until DOE receives the Department's final decision as to whether the requested extension is granted. If the request for extension is ultimately denied, stipulated penalties shall accrue from the date of the original milestone. Following the Department's approval of an extension, stipulated penalties shall accrue only from the most recently extended milestone.

7.5 If a modification requested by DOE pursuant to this section includes the addition of a tank or any tanks to the Covered Matters in the Action Plan, the Department's decision whether to allow the inclusion of a particular tank as a Covered Matter under this Consent Order shall be based upon the operational and regulatory status of the tank and its similarity to the tanks already included as Covered Matters. The burden of demonstrating the appropriateness of including a tank as a Covered Matter shall be on DOE. Once an individual tank is added as a Covered Matter, the tank shall be subject to the terms and conditions of this Consent Order.

7.6 The Action Plan may be modified by the Project Managers, except that the following modifications shall only be made by mutual agreement of the undersigned representatives of the Department and DOE or persons in comparable positions of authority:

1. Extensions of a milestone for any given Covered Matter for a cumulative period of more than one year;

2. Addition of any Covered Matter (except for a tank pursuant to Section 7.5 above) to the Action Plan; and

3. Any other modification determined by the Department Project Manager to require such approval.

7.7 The language of this Consent Order, excluding the Action Plan, may only be amended by mutual agreement of the undersigned representatives of the Department and DOE or persons in comparable positions of authority.

7.8 Any modification or amendment of this Consent Order, including the Action Plan, shall be in writing and shall be incorporated into this Consent Order and be enforceable in the same manner as any other requirement of this Consent Order. All modifications to the Action Plan shall be documented in the revised Action Plan submitted by DOE pursuant to Section 5.

8. PROJECT MANAGERS & COMMUNICATIONS

8.1 DOE and the Department have each designated the following as Project Managers:

D. Michael Gregory,
Hazardous Waste Enforcement Coordinator
State Waste Management and Remediation Program Office
Idaho Division of Environmental Quality
1410 N. Hilton St., 2nd floor
Boise, Idaho 83706-1255

Donald N. Rasch, Environmental Compliance Manager
Environmental Technical Support Division
United States Department of Energy, Idaho Operations Office
850 Energy Drive, MS 1146
Idaho Falls, Idaho 83401-1562

8.2 Either DOE or the Department may change its designated Project Manager by providing timely

written notice.

8.3 Each Project Manager shall be responsible for oversight of the implementation of this Consent Order. To the extent possible, communications between DOE and the Department concerning implementing the requirements of this Consent Order, including the submission of deliverables or other documents or notices, shall be directed through the Project Managers. Each Project Manager shall be responsible for assuring that all communications from the other Project Manager are disseminated appropriately to that responsible Project Manager's organization. The Project Managers shall have the appropriate level of authority to act for their respective agencies regarding the implementation of this Consent Order.

9. SUBMITTAL AND REVIEW OF DELIVERABLES

9.1 Except as otherwise provided for in this section, where Department review and approval of a document which is also a deliverable is expressly provided for by the HWMA, the Idaho Rules and Standards for Hazardous Waste, or other applicable law, or agreement, such submittal, review, and approval shall be made pursuant to the applicable authority and not in accordance with this section.

9.2 Except for those deliverables identified in Sections 9.1, the provisions of this section as set out below shall apply to all deliverables submitted by DOE for Departmental review and approval. The term "deliverable" is defined in Section 3.3 of this Consent Order. When submitting a deliverable, DOE shall identify the specific Action Plan provision requiring submittal of the deliverable.

9.3 In the course of its review, each party may consult with the other party as necessary regarding the adequacy of a deliverable. Oral comments made during any discussions shall not require a written response, unless requested by one or both of the Parties.

1. The Department's comments on any deliverable shall be provided with adequate specificity so that DOE can make the appropriate changes to the document. To the extent applicable, comments shall include specific citations to any sources of authority or references on which the comments are based. Upon reasonable request of DOE, the Department shall provide a copy of the cited authority or reference.

2. DOE shall submit all deliverables required under this Consent Order in good faith, as complete documents.

9.4 Until the Department's approval of a deliverable is granted, DOE may commence work related to the proposed activity covered by the deliverable only at its own risk.

9.5 The following procedures shall apply to deliverables under this Consent Order:

1. The Department shall, within thirty (30) days of initial receipt: (1) approve the deliverable as submitted, or (2) return the deliverable to DOE with comments so that changes can be made for resubmittal.

2. In the event the Department returns the deliverable to DOE with comments, within thirty (30) days of receipt, DOE shall respond to the Department's comments regarding the deliverable by modifying the deliverable consistent with the comments, or specifically stating the reason for a failure to make such modification, and re-submitting the deliverable. The Department shall, within thirty (30) days of receipt of the revised deliverable: (1) approve the deliverable, (2) disapprove the deliverable, or (3) return the deliverable to DOE with comments so that additional changes can be made for resubmittal. DOE shall continue to revise and re-submit the deliverable as necessary until it is approved or disapproved by the Department,

except that, unless the parties agree otherwise, the deliverable must be approved by the Department within one hundred and fifty (150) days of the milestone or the deliverable shall be deemed disapproved.

3. Except where a deliverable is automatically deemed disapproved by the Department at the end of 150 days pursuant to Section 9.5.2, and subject to Section 9.6, in the event the Department fails to take an action within the time frames specified in this section, the deliverable shall be deemed approved.

4. Subject to Section 9.6, in the event DOE fails to take an action within the time frames specified in this section, at the discretion of the Department and upon written notice to DOE, the deliverable may be disapproved.

5. In the event of disapproval of a deliverable under this section, the Department may by written notice to DOE, withdraw the related Covered Matter from the scope of this Consent Order. In such event, the Department may take any action available under law absent this Consent Order to address the withdrawn Covered Matter or any issue related to the Covered Matter.

9.6 The Parties shall comply with the time frames established in this section unless specifically scheduled or provided for otherwise. Either party may extend a period prescribed in this section for one additional thirty (30) day period by giving the other party written notice prior to the end of the original period. A longer extension period may be granted to DOE by the Department pursuant to Section 7 of this Consent Order, or to the Department by mutual agreement. Any extension of the Department's review period for a deliverable will automatically result in an equivalent extension of any milestone directly dependent upon the results of the review.

9.7 Once approved, actions identified in any deliverable required by this Consent Order shall become part of this Consent Order and shall be enforceable as such.

9.8 This section shall apply in cases where the parties determine that closure pursuant to IDAPA 16.01.05.009 [40 C.F.R. Part 265, subpart G] is the appropriate action for a particular Covered Matter.

1. If, after completing the initial milestone(s) or as otherwise provided for in the Action Plan, DOE determines that closure is the appropriate action, the next deliverable shall be identified as, "Submit milestone for submittal of draft closure plan and identify interim actions." This deliverable will be reviewed in accordance with Section 9.5.

2. As provided for in the Action Plan, DOE shall submit the draft closure plan as a deliverable. This deliverable shall also include a schedule for Department review and DOE revision of the closure plan, and the milestone by which the closure plan shall be submitted. The schedule shall provide for not more than two revisions before submittal of the closure plan. Only the schedule provided in the deliverable will be reviewed in accordance with Section 9.5. In addition, stipulated penalties under Section 6 shall only apply if the milestone for submittal of the draft closure plan is not met, or if the schedule is disapproved.

3. Upon approval of the schedule in the deliverable, the date for submittal of a closure plan shall become the next enforceable milestone. The draft closure plan will be reviewed pursuant to the schedule established in the Action Plan, and not Section 9.5. Other dates in the review and revision schedule are subject to Section 9.7, but are not milestones.

4. If in any instance the Department fails to meet its commitment for review as identified in the approved schedule, there shall be an automatic extension, equal to the length of the delay,

of the Department's review date and all subsequent dates in the schedule, including the milestone date for submittal of the closure plan.

5. Upon submittal, the closure plan shall be reviewed in accordance with Section 9.5, but such review and approval, and the applicability of stipulated penalties under Section 6, shall only be for purposes of determining that the milestone has been met and that the closure plan is ready for release for public comment. After such a determination, public notice, review, and comment shall proceed pursuant to IDAPA 16.01.05.009 (40 CFR § 265.112(d)(4)).

6. The final deliverable related to closure plans shall be the submittal of a certification of closure, with the milestone to be sixty (60) days from the date of completion of closure, as identified in the final closure plan. Upon approval of the deliverable associated with this milestone, the Covered Matter shall be transferred to Appendix C of the Action Plan as a closed Covered Matter.

7. The process for submittal of a Closure Plan under this Consent Order is illustrated in Appendix D to the Action Plan.

9.9 This section shall apply in cases where the parties determine that application for a RCRA permit is the appropriate action for a particular Covered Matter.

1. If, after completing the initial milestone(s) or as otherwise provided for in the Action Plan, DOE determines that a particular unit should be permitted, the next deliverable shall be identified as, "Submit notice for RCRA permitting and identify any necessary interim actions." This deliverable shall be reviewed in accordance with Section 9.5.

2. If the Department approves DOE's determination that a RCRA permit is required, the schedule for submittal and approval of the permit shall be in accordance with the RCRA Part B Work Plan, and shall not be subject to the review process in Section 9.5 of this Consent Order or stipulated penalties. However, the Covered Matter and any identified interim actions will continue to be covered under this Consent Order in accordance with Section 9.7 until the permit is issued or the matter otherwise comes into compliance and becomes a Closed Matter.

3. If the Department either: a) disapproves DOE's determination that a RCRA permit is required; or b) disapproves the RCRA permit application; then DOE shall, within 90 days after the Department's disapproval, either: a) submit a deliverable which includes milestones for submittal of a draft closure plan in accordance with Section 9.8; or b) submit a deliverable which includes milestone(s) for further Consent Order actions in accordance with Section 4.4.2.

4. Nothing in this Consent Order shall effect the Department's authority to require DOE's submission of a RCRA permit application at any time.

5. The process for submittal of a RCRA permit application under this Consent Order is illustrated by Appendix D to the Action Plan.

9.10 This section shall apply in cases where the parties determine that a Covered Matter should be addressed under the Federal Facility Agreement and Consent Order (FFA/CO), executed by DOE, the Department, and the Environmental Protection Agency Region 10 on December 9, 1991.

1. If, after completing the initial milestone(s) or as otherwise provided for in the Action Plan, DOE determines that a particular Covered Matter should be addressed under the FFA/CO,

the next deliverable shall be identified as, "Submit schedule for submittal of New Site Identification Form (NSIF)." This deliverable shall be reviewed in accordance with Section 9.5.

2. Upon approval of the schedule in the deliverable, the date for submittal of the NSIF shall become the next enforceable milestone. However, the review and approval process for the NSIF shall be in accordance with the process established through the FFA/CO, and not Section 9.5. In addition, stipulated penalties under Section 6 shall only apply if the milestone for submittal of the NSIF is not met.

3. If the NSIF is approved through the FFA/CO process, the Covered Matter shall be moved to Appendix C as a Closed Matter. If the NSIF is disapproved through the FFA/CO process and all processes for review of that decision are exhausted, DOE shall, within 90 days of a final determination under the FFA/CO, submit a deliverable for further action in accordance with Section 4.4.2 of this Consent Order.

4. The process for submittal of a NSIF under this Consent Order is illustrated by Appendix D to the Action Plan.

10. ENFORCEABILITY

10.1 DOE expressly recognizes that failure to comply with the terms of this Consent Order may result in an enforcement action for any relief available to the Department. In any such civil or administrative proceeding by the Department to enforce this Consent Order, DOE agrees not to contest the validity of the provisions of this Consent Order or the Department's authority to enforce this Consent Order.

10.2 DOE acknowledges that this Consent Order is enforceable pursuant to the citizen suit provisions of RCRA, 42 U.S.C. § 6972, including actions or suits by the State and its agencies. DOE agrees that the State and its agencies are a "person" within the meaning of § 7002(a) of RCRA, 42 U.S.C. § 6972(a).

10.3 DOE agrees that this Consent Order shall be admissible as evidence in any proceeding to enforce this Consent Order.

11. TERMINATION

11.1 This Consent Order shall bind DOE, its employees, officers, directors, officials, trustees, contractors, subcontractors, consultants, tenants, agents, successors and assigns until such time as the terms of the Consent Order are met and the Consent Order is terminated in writing by the Department; or, with regard to a specific Covered Matter, until the Covered Matter is withdrawn from this Consent Order pursuant to Sections 9.5.5 or 13.5. A request for the Department's written termination of this Consent Order shall not be unreasonably denied.

11.2 This Consent Order shall not relieve DOE of its obligation to comply with any of the applicable provisions of the HWMA, or the Idaho Rules and Standards for Hazardous Waste, including any permit, closure, post-closure, public notice and comment, or other hazardous waste requirement except as specifically provided in this Consent Order. This Consent Order shall not relieve DOE of its obligation to comply with any other applicable federal, state, or local law, or with the terms of any interagency or other agreements between the Department and DOE.

12. FUNDING

12.1 DOE shall take all necessary steps to obtain sufficient funding to comply with the provisions of this Consent Order and, once obtained, shall obligate those funds for the purpose of compliance with this

Consent Order. Based upon the amount of annual funding it receives, pursuant to Sections 7 and 11 of this Consent Order, DOE may be able to seek an adjustment of its commitments under this Consent Order. DOE may request that the Department consider DOE's funding constraints in making a final decision with regard to such proposed adjustment.

12.2 DOE maintains that any requirement for the payment or obligation of funds under this Consent Order is subject to the provisions of the Anti-Deficiency Act, 31 U.S.C. § 1341. DOE also maintains that any requirement for the payment or obligation of funds under this Consent Order is subject to the availability of appropriated funds and that the unavailability of such funds may constitute a valid defense to any administrative or judicial action that may be brought to enforce the terms of this Consent Order. The Department recognizes the provisions of the Anti-Deficiency Act but does not agree that failure to obtain adequate funds or appropriations to comply with this Consent Order shall constitute a circumstance beyond the reasonable control of DOE or shall constitute a release from or defense to any administrative or judicial action which may be brought to enforce this Consent Order. DOE and the Department agree that it is premature to raise the validity of such a defense at this time. If, at any time, adequate funds or appropriations are not available to comply with this Consent Order, DOE shall notify the Department in writing and the Department shall determine whether or not it is appropriate to adjust the milestones set forth in this Consent Order. DOE reserves the right to raise the Anti-Deficiency Act as a defense to any action brought to enforce this Consent Order .

13. COVENANTS AND RESERVATIONS

13.1 This Consent Order shall stand in lieu of any administrative, legal and equitable remedies which are available to the Department against DOE and all parties bound by this Consent Order with respect to Covered Matters, so long as DOE and all parties bound by this Consent Order are in compliance with the Consent Order as determined by the Department or a court of competent jurisdiction.

13.2 Except as specifically set forth in this Consent Order, the Department expressly reserves all of its statutory and regulatory powers, authorities, rights, remedies, and defenses, both legal and equitable, which relate to the failure of DOE to comply with any of the requirements of this Consent Order. The Department reserves the right to disapprove of work performed or deliverables submitted by DOE. Except as set forth in Section 13.1, this Consent Order shall not be construed as a covenant not to sue, a release, a waiver or a limitation of any rights, remedies, powers or authorities, civil or criminal, which the Department has under the HWMA or any other statutory, regulatory, or common law or agreement.

13.3 Except as specifically set forth herein, DOE reserves and does not waive any rights, authority, claims or defenses, including sovereign immunity, that it may have or wish to pursue in any administrative, judicial or other proceeding with respect to any person; nor does DOE waive any claim of jurisdiction over matters which may be reserved to DOE by law, including the Atomic Energy Act. Nothing in this Consent Order shall constitute an admission on the part of DOE, in whole or in part, in any proceeding except in a proceeding to enforce this Consent Order. DOE specifically reserves all rights it may have by law to seek and obtain administrative or judicial review or appeal according to law of any determination made by the Department during DOE's performance of its obligations under this Consent Order. During the pendency of any such administrative review or appeal, DOE shall continue to comply with the requirements of this Consent Order unless otherwise authorized or required by law or a court of competent jurisdiction. DOE specifically reserves all rights it may have by law to seek and obtain administrative or judicial review or appeal of permit requirements.

13.4 Except as specifically set forth herein, this Consent Order in no way restricts the Department from taking action available under law to address past, present or future violations of the HWMA, the Idaho Rules and Standards for Hazardous Waste, or other applicable law.

13.5 As described in Section 4.1 of this Consent Order, based upon the assumption that the Covered

Matters have been fully identified by the Department and DOE, no Notice of Violation was issued to and no civil penalties were assessed against DOE by the Department for the Covered Matters addressed by this Consent Order. If, subsequent to the effective date of this Consent Order, new information is obtained by the Department regarding a Covered Matter, or if DOE violates the provisions of this Consent Order regarding a Covered Matter, the Department may determine that the Covered Matter should no longer be a Covered Matter for purposes of this Consent Order. The Department may then terminate, by written notice, the requirements of this Consent Order with regard to the particular Covered Matter, and the Department may take any action available under law absent this Consent Order to address the terminated Covered Matter or any issue related to the Covered Matter.

14. STATE LIABILITY

Nothing in this Consent Order shall be deemed to extend to the Department or the State of Idaho any liability under any federal, state, or local law.

15. ACCESS

Nothing in this Consent Order limits or otherwise affects the Department's right of access and entry pursuant to applicable federal, state, or local law.

16. EFFECTIVE DATE

The effective date of this Consent Order shall be the date of signature by the Administrator of the Idaho Division of Environmental Quality. Each of the undersigned representatives of the Parties warrants that he or she is fully authorized to and does hereby enter into and legally bind his or her agency to this Consent Order.

SO AGREED:

DATE 5/31/00 SIGNED: Beverly Cook

BEVERLY COOK
MANAGER
U.S. DEPARTMENT OF ENERGY
IDAHO OPERATIONS OFFICE

DATE 6/14/2000 SIGNED: C. Stephen Allred

C. STEPHEN ALLRED
ADMINISTRATOR
DIVISION OF ENVIRONMENTAL QUALITY
IDAHO DEPT. OF HEALTH & WELFARE
STATE OF IDAHO

IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY

CONSENT ORDER ACTION PLAN

1. Purpose of the Action Plan

The purpose of this Action Plan is to document the actions to be taken and the milestones for covered matters under the Consent Order.

2. Covered Matters

Covered matters with detailed action plans are identified in Appendix A. Covered matters with tiered milestones are identified in Appendix B. Covered matters that are closed are identified in Appendix C. Examples of Permitting Closure and New Site Identification Form Review and Approval under the VCO as included in Appendix D.

APPENDIX A

Description of Covered Matters with Detailed Action Plans

VCO Number: NEW-CPP-020

Issue Title: Unpermitted Storage of Calcine and Calcine Handling Tools at NWCF

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*

Issue Description: There is approximately 6 kg of calcine stored in a shielded box in CPP-659 Decon Cubicle #2 and five casks and one waste box containing tools or sampling tubes and residual calcine stored on top of the hatch covers in the decon area of CPP-659. The calcine has been in Decon Cubicle #2 since 1993 and the waste box and casks have been on top of the hatch covers since 1989. The calcine and tools are mixed waste and the top of the hatch covers and the Decon Cubicle #2 are not RCRA permitted or interim status mixed waste storage facilities.

Action Summary: DOE shall submit a list of proposed interim actions to the Department.

The calcine samples currently stored in Decon Cubicle #2 will be transferred to CPP-601 D-Cell, an interim status storage facility.

Within 18 months of receiving a permit to operate debris treatment, the material in the waste box and the five casks at CPP-659 will be dispositioned as appropriate. Items will be processed through debris treatment if feasible. Items that cannot feasibly be debris treated will be transferred to an interim status or RCRA permitted mixed waste storage facility. After the tools or samplers have been removed, casks that do not have an identified current or future use will be disposed of as empty containers (low level waste) or transferred to an interim status or RCRA permitted mixed waste storage facility. Any recoverable calcine from the casks will be dissolved and sent to the tank farm or transferred to an interim status or RCRA permitted storage facility.

Interim Actions: None designated at this time.

Action:

Action Description	Milestone
Submit a list of proposed interim actions to the Department for review and approval.	06/30/00
Transfer NWCF Calcine to CPP-601 D-Cell.	03/31/01

VCO Number: NEW-TAN-003A

Issue Title: Unpermitted Storage and Treatment Without a Permit at WRRTF Potable Water System

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*

Issue Description: Potable water containing F001 hazardous waste is presently being pumped, stored, distributed and disposed at WRRTF without meeting RCRA management requirements, and without having received a "no-longer contained in" determination from Idaho DEQ.

Action Summary: INEEL has submitted a "no longer contained in" determination request to DEQ to cover the WRRTF potable water system. DEQ has requested additional information and actions. The INEEL is in the process of responding to those requests. If the "no longer contained in" request is approved, this issue will be considered closed and moved to Appendix C. If the "no longer contained in" determination is denied (and DEQ informs DOE that further/revised requests on this system will not be processed), DOE will submit a proposed schedule of milestones, and interim actions if necessary, within 90 days of that determination.

Interim Actions: Nondesignated at this time.

Action:

Action Description	Milestone
If the "no longer contained in" determination is denied (and DEQ informs DOE that further/revised requests on this system will not be processed), submit a proposed schedule of milestones and any interim actions.	90 days following disapproval of the "no longer contained in" determination

VCO Number: NEW-TRA-001

Issue Title: Inadequate Hazardous Waste Determination of TRA Waste (see table "TRA Legacy Waste List")

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*
40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*

Issue Description: A complete hazardous waste determination has not been performed on the contents of containers of waste and other items stored at several locations at TRA. Some of those items are known or believed to have hazardous characteristics and are being stored in excess of 90 days. The waste description and storage locations are included in the attached table.

Action Summary: A hazardous waste determination will be performed for all items identified on the attached table. Upon completion of the determination, any items determined to be hazardous will be moved to an interim status or RCRA permitted storage or disposal facility.

Interim Actions: See interim action section for each item on the attached table.

Action:

Action Description	Milestone
Complete hazardous waste determinations for 25% of the items and move items determined to be hazardous waste to an interim status or permitted hazardous waste storage or disposal facility.	06/30/01
Complete hazardous waste determinations for 50% of the items and move items determined to be hazardous waste to an interim status or permitted hazardous waste storage or disposal facility.	06/30/02
Complete hazardous waste determinations for 75% of the items and move items determined to be hazardous waste to an interim status or permitted hazardous waste storage or disposal facility.	06/30/03
Complete hazardous waste determinations for 100% of the items and move items determined to be hazardous waste to an interim status or permitted hazardous waste storage or disposal facility.	06/30/04

VCO Issue NEW-TRA-001: TRA Legacy Waste List

Line No.	Tracking No.	Facility: Building or TAA Number (*)	Description	VCO Interim Actions
1	145	TRA: ETR AREA	NaOH PortableTank, East of TRA-644. There is a container marked NaOH with approximately 10 gallons of material inside. Tank List: ETR/644, page 74, #98TRA00331.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The contents of this tank are in a solid, stable form and do not present an immediate danger to human health or the environment. The tank is located in a radiologically controlled, non-traffic area. Therefore, inspections of this container are performed and documented monthly.
2	147	TRA: ATR CANALS	680 capsules stored in the ATR Canal for shielding purposes contain small amounts of NaK.	A notation is listed on the grid map indicating that the capsules are considered potentially hazardous waste. Access to the ATR Canal is closely controlled due to the radiological hazards. A semi-annual inventory is conducted by plant operations. No additional inspections are conducted due to the stable environment of the storage and the increased risk to human health.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Item No.	Tracking No.	Facility Building or TAA Number(s)	Description	VCO Interim Actions
3	165	TRA-657-PLUG-A*	Space Reactor Project Waste: Lithium Hydride (LiH) and Sodium Potassium (NaK) were used in tests related to the Space Reactor Project (SRP). The SRP terminated in 1990. The material is stored in two 30 gal drums and in two special containers designed to hold the test capsules. The material is lithium hydride sized to fit reactor experimental holders. Also, there are some Temperature Element Devices (TEDs) that contain NaK seal welded in small thimbles. PSA-051 (96SMT070187) - Irradiation Experiment, SP-100, Sodium Metals (Nak TEDs). Barcode 11029 (96SMT070129): LiH, may be unirradiated LiH, (see #246). Barcode #11668 (LiH/NaK). Barcode #11679 (LiH).	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility, Building or TRA Number(s)	Description	VCO Interim Action
4	166	TRA-657-PLUG-A*	Legacy lead bricks, shot, etc., which need to be characterized and recycled or shipped for disposal: PSA-30: contains lead shot. At TRA-657-PSA (see #237). PSA-33: 55-gallon drum with lead shot. At TRA-657-PSA, (see #239). 13209K: Lead shot in 55-gallon drum. At TRA-657-PSA, (see #273). 13210K: Lead shot in 55-gallon drum. At TRA-657-PSA, (see #274). 13211K: Lead shot in 30-gallon drum. At TRA-657-PSA, (see #275). 13213K: 1 lead sheet, 1 lead pig in 5-gallon drum. At TRA-657-PLUG-A, (see #276). 13214K: 5 lead bricks. At TRA-657-PSA, (see #277). 13212K: Lead shot, 30-gallon container. At TRA-657-PLUG-A. Barcodes 16638K, 16639K, 16640K, 16641K, and 16642K at TRA-657-PLUG-A.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
5	172	TRA: 645	2-Wooden Boxes in Storage Yard 8, East of TRA-645. Labeled "unknown." Wooden boxes contain ETR reactor components.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The contents of these boxes are not known to be hazardous, and are solid, stable waste. Therefore, inspections are performed and documented monthly.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Item No	Tracking No	Facility Building or TRA Number(s)	Description	VCO Interim Actions
6	173	TRA: 644	Cask in laydown area South-East of TRA-644. Labeled (painted) as "164." Out-of-service shipping cask probably has lead shielding inside. (RCRA Cradle to Grave - Picture 7).	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The lead is a solid, stable waste form and is sealed within the shipping cask. The lead presents no potential to leach to the environment, is not an immediate threat to human health, and is stored in a radiologically controlled area. Therefore, inspections are performed and documented monthly.
7	174	TRA: 644	Large black rad. contaminated tank East of TRA-644 with a number "45" written on the West end of tank. Tank contains a small amount of kitty litter and used oil.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The tank contents are solid and present no potential to leach to the environment, are not a threat to human health, and the tank is stored in a radiologically controlled area. Therefore, inspections are performed and documented monthly.
8	181	TRA-657-PLUG-A*	Barcodes 16635, and 11034 : Tap Magic and High Pressure Lube	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
9	196	TRA: 670	ATR canal trash: this consists of metal pneumatic rabbit terminals shield, containing radioactively contaminated lead, and two CIT plugs containing radioactively contaminated lead.	A notation is listed on the grid map indicating that the capsules are considered potentially hazardous waste. Access to the ATR Canal is closely controlled due to the personnel radiological hazards. A semi-annual inventory is conducted by plant operations. No additional inspections are conducted due to the stable environment of the storage and the increased risk to human health.
10	249	TRA-657-PLUG-A*	PSA-036: PPE and contaminated spill-X, and Barcode 03314: from PSA-036.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
11	251	TRA-657-PLUG-A*	PSA-072: Filter, housing	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility, Building or TAA Number(s)	Description	VCO Interim Actions
12	254	TRA-657-PLUG-A*	PSA-038, 83-gallon drum 1/8-full of Co-60 contaminated soil.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
13	255	TRA-657-PLUG-A*	PSA-039: 55-gallon drum with poly liner inside it. Inside poly liner is 15-gallon poly drum with resin and a metal shaft inside the resin. Resin is radioactively contaminated.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
14	258	TRA-657-PLUG-A*	Barcode 11611: One gallon can from PSA-015. Two vials with TMI residue.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
15	260	TRA-657-PLUG-A*	Barcode 11629: Legacy waste from sample/waste roundup	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
16	261	TRA-657-PLUG-A*	Barcode 11630: Legacy waste from sample/waste roundup	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
17	264	TRA-657-PLUG-A*	Barcode 11038: 28 products in the original containers awaiting disposal.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
18	267	TRA-657-PLUG-A*	Barcode 11011: ATR HX cleanup. (2-one gallon cans of dried yellow paint, two unlabeled aerosol cans, one bag of PPE which appear to be soaked in an unknown solvent and a 500mL poly bottle with what appears to be oil from ARA-1)	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
19	307	TRA-657-PLUG-A*	PSA-029 (inside a hot box): SFD 1-4 Steamline and SFD 1-4 Deposition Rod Pieces. (Also includes two one inch met mounts) SFD 1-3 and 1-4 Deposition Rod pieces.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
20	308	TRA: 632	Met Mounts. Met mounts might contain fissile material (not waste). Cask #XMTR-II (includes PCM-7, PR-1, and Optran Burnup fuel pieces).	Signs are posted on the window of the hot cell stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. These items are in a solid, stable form and pose no potential for release to the environment. They are stored in the hot cell facility, which has controlled access due to radiological concerns. Therefore, inspections are performed and documented monthly.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility Building or TRA Number(s)	Description	VCO Interim Action
21	310	TRA: 632	Fort St.Vrain Probe Parts, eleven items: S6A2, S3A1, S5A2, S2A2, S6A1, S5A1, S3A2, S4A2, S1A1, S2A1, S2A1.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. These items are in a solid, stable form and pose no potential for release to the environment. They are stored in the hot cell facility, which has controlled access due to radiological concerns. Therefore, inspections are performed and documented monthly.
22	329	TRA-657-PLUG-A*	PSA-027 - Contains 3 empty (TMI) sample containers (potential lead). Sample Containers Empty - Considered Waste	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
23	333	TRA-657-PLUG-A*	PSA-034 - DOT 2R SN#1314 PSA-035 - DOT 2R SN#1311 Empty 2R containers. Lead lined. May be reuseable.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
24	335	TRA-657-PLUG-A*	PSA-040 - Contaminated Leaching Equipment - Source Term Sampler	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
25	340	TRA-657-PLUG-A*	PSA-025 - EIVTS (1 of 2) This appears to be barrel #1 (of 2), containing special sources requested by DOE-ID to be stored in PSA. PSA-018 - 17C, #2 EIVTS contains special sources Cd-109. A,-241, & Cs-137. A total of 0.25 curies. PSA-049 - EIVTS Special RAD Sources, Co-60.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
26	344	TRA-657-PLUG-A*	PSA-060 (96SMT070194) - contains cement core bore and lead shot; Barcode 14346K.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
27	345	TRA-657-PLUG-A*	Empty lead cask (extremely heavy)	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
28	346	TRA-657-PLUG-A*	PSA-062 - Tools. Appears to be old fuel handling tools (probably aluminum).	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility Building or TAA Number (s)	Description	VCO Interim Actions
29	347	TRA-657-PLUG-A*	PSA-063 - Eberline Model #Sa-2a SER#113. Item is believed to contain a radioactive source.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
30	348	TRA-657-PLUG-A*	PSA-065 - LP-FR-2 Piping Components (from LOFT Project).	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
31	349	TRA-657-PLUG-A*	PSA-067 - TMI Rod Holder with Fixed Contamination on Legs	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
32	350	TRA-657-PLUG-A*	PSA-068 - TTAF Strongback 1 of 2 PSA-069 - TTAF Strongback 2 of 2	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
33	351	TRA-657-PLUG-A*	PSA-070 - Radioactive Low Specific Activity (RALSA), contains mechanical drive (2 long metal duct-like items and one long rod) all wrapped yellow poly(1986).	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
34	352	TRA-657-PLUG-A*	PSA-071 - BXW, contains long metal duct-like items and one long rod wrapped yellow poly.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
35	353	TRA-657-PLUG-A*	PSA-073 - Metal Box: contains TMI metal spool.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
36	354	TRA-657-PLUG-A*	PSA-076 - RCT RAM Equipment W/Sr-90 Internal Sources	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
37	395	TRA-657-PLUG-A*	Barcode TRA-657-PAW-01: Two 540-ml containers of radiologically contaminated mercury, originating from the TRA Hot Cells (now operated by International Isotopes Idaho, Inc.)	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
38	408	TRA-657-PLUG-A*	PSA-023, 55-gallon drum contained 2-C-14/H-3 sampling instruments.. PSA-041, 55-gallon drum contained TMI Sr-90 irradiator instrumentation.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
39	416	TRA-657-PLUG-A*	PSA-039D, 5-gallon can, contains 2 electrical devices (appear to be thermostats) and cobalt contaminated sand, (PSA-038A, 60-ml, rad\Co-60).	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility, Building or TAA Number(s)	Description	VCO Interim Actions
40	417	TRA-657-PLUG-A*	PSA-037, 110-gallon drum, empty PVC pipes (schedule 40) with lead wrapped around pipes for shielding.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
41	425	TRA-657-PLUG-A*	Radioactive elemental lead pieces, in 4x4x2 wooden box, barcode #11682.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
42	426	TRA-657-PLUG-A*	Radioactive elemental lead pieces, in 4x4x2 wooden box, barcode #11683.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
43	428	TRA: 644	Two black casks in laydown area South-East of TRA-644. The casks are approximately 5 feet long and 2 feet in diameter (cylinder welding letters which state, "Radioactive Material B of E permit #362," further, shape) and appear to be carbon steel.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The contents are not known to be hazardous, and are sealed within the casks. These casks protect any contents from release to the environment and are stored in a radiologically controlled area. Therefore, inspections are performed and documented monthly.
44	429	TRA: 644	One blue cylinder enclosed in a wire cage, in laydown area South-East of TRA-644. The cylinder appears to be 7 ft long by 2 inches in diameter. The cage is 18 inches by 18 inches by 7 ft. No identifiable markings are on the outside of the cask.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The contents of this cylinder are not known to be hazardous, and it is stored in a radiologically controlled area. The cylinder protects the environment from any potential release of contents. Therefore, inspections are performed and documented monthly.
45	430	TRA: 617	Black tank located inside a cargo container. Cargo container is presently located on the TRA-617 segregated waste pad. Tank came from behind the ATR Reactor buildings and belongs to ATR.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The contents are not known to be hazardous. Therefore, inspections are performed and documented monthly.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Item No.	Tracking No.	Facility, Building or TRA Number(s)	Description	VCO Interim Actions
46	431	TRA: 664	North storage area boxes. These boxes are located inside TRA 664 which is located outside of the security fence. This is believed to be ETR components stored in boxes. No inventory has been completed to date.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. Access to TRA-664 is controlled by an additional fence surrounding the building which identifies the TRA-664 as a radiological contaminated area. Because of the risk to human health from the radiological exposure and the potential of Hanta virus, the building entry is restricted. The boxes pose no immediate risk and monthly inspections are conducted to ensure signs remain posted and fence integrity is maintained.
47	433	TRA: 643	Abandoned control panels. There are 16 panels in TRA-643. The regulatory concern is that the panels could contain hazardous waste in the form of RCRA (heavy metals), TSCA (PCB), and NESHAPS (asbestos) that could not be recycled or reused.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The waste is in a solid, stable form and presents no potential for release to the environment or risk to human health. Therefore, inspections are performed and documented monthly.
48	434	TRA-657-PLUG-A*	Barcode #16676K: 5-gallon can. Contains organics from Amersham Corp.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
49	435	TRA-657-PLUG-A*	Bar Codes #16577K and 16576K: 630/605 samples.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
50	436	TRA-657-PLUG-A*	Barcodes 7752 and 14361K: potentially contaminated PPE.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.
51	439	TRA-657-PLUG-A*	PSA-057 (96WMT070192) – empty Red 2R container.	Requirements of 40 CFR 262.34 are met with the exception of the 90-day storage limit.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility Building or TAA Number(s)	Description	VCO Interim Action
52	440	TRA: 632	Cask 302 and 304: contain SFD deposition rod pieces, located behind Hot Cell #1 in a RMA inside TRA-632.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. Because these items are in a stable form, are stored in a building with controlled access due to radiological concerns, and present no immediate threat to human health or the environment, inspections are performed and documented monthly.
53	441	TRA: 604	Abandoned control panels. There are 3 panels in TRA-604. The regulatory concern is that the panels could contain hazardous waste in the form of RCRA (heavy metals), TSCA (PCB), and NESHAPS (asbestos) that could not be recycled or reused.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The waste is in a solid, stable form and presents no potential for release to the environment or risk to human health. Therefore, inspections are performed and documented monthly.
54	442	TRA: 632	Lead stored in 55-gallon drum in back portion of hotcell in TRA-632: 3 lead bricks, 130 lead putty bricks, 1 lead blanket, 3 pigs, and loose lead (in tape).	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. Because these items are in a stable form, are stored in a building with controlled access due to radiological concerns, and present no immediate threat to human health or the environment, inspections are performed and documented monthly.
55	443	TRA: 642	68-ft^3 lead brick previously used for shielding in the GEEL Tunnel, 30-ft^3 lead brick previously used for shielding in the Sodium Loop entrance, 6- lead bricks in J-10/L-10 cubical area.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. Because these items are in a stable form and building access is controlled due to the increased risk to human health posed by radiological and asbestos hazards, inspections are performed and documented monthly to ensure that signs remain posted at the entrances to each item.

VCO Issue NEW-TRA-001: TRA Legacy Waste

Item No.	Tracking No.	Facility Building or TRA Number(s)	Description	VCO Interim Actions
56	444	TRA: 643	Lead impregnated sheet by GEEL air compressors in TRA-643 (600 lbs).	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. These items are in a solid, stable form and do not present a potential release to the environment. Building access is controlled due to radiological risk to human health. Therefore, inspections are performed and documented monthly.
57	445	TRA: 664	36-ft^3 shield blocks and 1 brick, previously used for shielding inside TRA-664.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. Access to TRA-664 is controlled by an additional fence surrounding the building which identifies the TRA-664 as a radiological contaminated area. Because of the risk to human health from the radiological exposure and the potential of Hanta virus, the building entry is restricted. The boxes pose no immediate risk and monthly inspections are conducted to ensure signs remain posted.
58	446	TRA: 603	Coffin Dolly Assembly, Property ID #340655	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The assembly is a solid, stable form and is wrapped in poly, and poses no immediate threat to human health or the environment. Inspections are performed and documented monthly.

Appendix A: Description of Covered Matters with Detailed Action Plans

VCO Issue NEW-TRA-001: TRA Legacy Waste

Line No.	Tracking No.	Facility Building or TRA Number(s)	Description	VCO Interim Action
59	447	TRA: 603	Plug Beam Hole Assembly, Property ID #340657.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The assembly is a solid, stable form and is wrapped in poly, and poses no immediate threat to human health or the environment. Inspections are performed and documented monthly.
60	448	TRA: 641	Pellets that may contain regulated concentrations of chrome in the bottom of the calcine pelletizer located at the West end of TRA-641.	Signs are posted stating that the waste is potentially hazardous and is part of VCO item # NEW-TRA-001. The signs include a unique identifier. The pellets are in a solid, stable form and located inside the pelletizer. Building access is controlled. This waste presents no potential for release to the environment, and is not an immediate risk to human health. Therefore, inspections are performed and documented monthly.

VCO Number: NEW-TRA-006

Issue Title: Inactive Piping and Ancillary Equipment at TRA-631 Brine Pit Pump House Adjacent Areas

Citation:

40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*

Issue Description: In the 53 foot North-South trench adjacent to the TRA-631 pump house, there are a number of inactive lines that have not been characterized. The lines are: (a) inactive raw water line with asbestos contaminated material and inactive sulfuric acid transfer lines, (b) 3-inactive 1-inch carbon steel lines, possibly plant air or water lines to previous safety shower, (c) inactive hot water recirculation line with asbestos contaminated material, (d) inactive caustic line with steam coil, with asbestos contaminated material. Also, in the bottom of the trench itself, there is acid spill residue and loose caustic (white chunks).

Action Summary: Hazardous waste determinations will be performed on materials in the trench. All inactive equipment, conduits and piping will be removed, and the trench will be cleaned of acid and caustic contaminated debris. All items determined to be hazardous waste will be managed in accordance with RCRA.

The fenced area north of TRA-608 where the North-South trench is located met the requirements for inactive waste sites requiring further investigation under the INEEL FFA/CO and the INEEL FFA/CO Responsible Program Managers approved a new site identification form for the area in November 1999. The site was designated as control area "TRA-60". Therefore, debris removed from the trench will be addressed under this action plan and any previous releases from the trench to the soil will be addressed under the INEEL FFA/CO.

Interim Actions: None specified.

Action:

Action Description	Milestone
Complete hazardous waste determinations for items in the trench and manage items determined to be hazardous waste in accordance with RCRA.	12/31/00

APPENDIX B
Description of Covered Matters with Tiered Milestones

APPENDIX B: Description of Covered Matters with Tiered Milestones

VCO Number: NEW-CPP-016

Issue Title: Inadequate Hazardous Waste Determination on Tanks at CPP-603

Citation: IDAPA 16.01.05.006 [40 CFR 262.11] states in relevant part:
"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."

Issue Description: The tanks addressed in this Action Plan consist of sand filters, filter wash water holding tank, clarifier, demineralizer resin beds and an acid regeneration tank at CPP-603. The tank system is part of a water treatment system for the underwater spent nuclear fuel storage basin in CPP-603. The treatment system has not operated since May 1995 and will not be used in the future. Tank system components are identified as follows:

98CPP00610	F-SF-113	Multi-Media Sand Filter
98CPP00611	F-SF-114	Multi-Media Sand Filter
98CPP00612	F-SF-115	Multi-Media Sand Filter
98CPP00619	VES-SF-108	Filter Backwash Holding Tank
98CPP00620	VES-SF-109	Collection Tank, Clarifier Vessel
98CPP00631	VES-SF-130	Acid Regeneration Makeup Tank
98CPP00632	VES-SF-131	Duolite C-464 Resin Tank
98CPP00633	VES-SF-132	Zeolon 900 Resin Tank

Action Summary: DOE will perform a system identification and will mark each tank with a unique identifier number. The tanks will be sampled and a hazardous waste determination will be performed. If, due to radiological considerations, sampling can not be performed, a hazardous waste determination may be performed based on process knowledge or the Milestone may need to be renegotiated. If the tank system is determined to contain hazardous waste, DOE will submit a proposed schedule of further Milestones and a description of any proposed interim actions.

Interim Actions: None specified.

Action:

Action Description	Milestone
Perform a system identification and mark each tank with a unique identification number.	03/31/01
Complete hazardous waste determination on the tank system.	06/30/01
Submit proposed schedule of further Milestones and description of any interim actions.	90 days following approval of previous Milestone

APPENDIX B: Description of Covered Matters with Tiered Milestones

VCO Number: NEW-PBF-001

Issue Title: Hazardous Waste Determination of Equipment and Components in the Power Burst Facility

Citation: IDAPA 16.01.05.006 [40 CFR 262.11] states in relevant part:
"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."

Issue Description:

The equipment and tank systems and the contents of the equipment and tank systems listed in the attached table titled "Equipment List" have been determined by DOE to be a solid waste. DOE has not performed a hazardous waste determination on the equipment and components.

Action Summary: Perform a hazardous waste determination on the equipment and tank systems, and contents of the equipment and tank systems listed in the attached table ("Equipment List"). If any of the items or materials are determined to be useable, they will be moved to Appendix C – Covered Matters that are closed, with an explanation of how the item or equipment is useable. If any of the equipment and tanks systems, or contents of the equipment and tank systems are determined to be hazardous waste, DOE will submit a proposed schedule of further Milestones and a description of any proposed interim actions.

Interim Actions: None specified.

Action:

Action Description	Milestone
Remove any items from the list for which a hazardous waste determination has been performed and submit the revised list.	12/31/00
Complete hazardous waste determinations.	03/31/04
Submit proposed schedule of further Milestones and description of any interim actions.	90 days following approval of previous Milestone

VCO Issue NEW-PBF-001 : Equipment List

Line No.	Tracking No.	Equipment Description	Location	Equipment ID Number
1	PBF001	Warm Waste Well Monitor (lead)	PER 620	
2	PBF002	Fission Product Detection System (old one w/ lead bricks)	PER 620, 2nd basement	
3	PBF003	Fission Product Detection System (Cubicle 13—900R)	PER 620, Cubicle 13	
4	PBF004	Panel Mounted Air Conditioners for Elec. Equip. (Freon)	PER 620	
5	PBF005	In Pile Tube, IPT (inconel > Class C)	PER 620, Canal	
6	PBF006	Oil in Loop Makeup Pump used w/ IPT (~1 gal. Oil)	PER 620	
7	PBF007	Oil in Quench Pump used w/ IPT (~1 gal. Oil)	PER 620	
8	PBF008	Oil – In Pile Tube Acoustic Filter Pump (~1 gal. Oil)	PER 620	
9	PBF009	Oil – Breech Lock Hydraulics	PER 620	
10	PBF010	LOCA Blowdown (oil in dilution pumps)	PER 620	
11	PBF011	Core Filler Pieces in T-1 (aluminum & stainless steel	PER 604	
12	PBF012	Blowdown Tank (98PBF00202)	PER 620, Cubicle 13	11-M-201-01
13	PBF013	Oil – Air Compressor Sump (98PBF00201)	PER 620, 1st basement	620-M-36
14	PBF014	MG Set Sump (98PBF00178)	PER 625	
15	PBF015	PER 621 Plan Generator Sump	PER 621	621-M-1
16	PBF016	Septic Tank by Bldg. PER 619 (97PBF00054)	PER 619	PER 724
17	PBF017	Septic Tank and drainfield by PER 620 (97PBF00093)	PER 620	PER 728
18	PBF018	Evaporation Tank (98PBF00173)	PER 620	PER 706
19	PBF019	Warm Waste Sump in PER 620 (98PBF00070)	PER 620, 1st basement	
20	PBF020	Hot Waste Tank 1000 gal. – AST - (98PBF00087)	PER 620	620-M-9
21	PBF021	Hot Waste Storage – UST - (98PBF00172)	PER 620	PER 732
22	PBF022	Sump, Diesel Lubricating Oil, PER 625 - (98PBF00177)	PER 625	
23	PBF023	Resin Tank for Rx and Canal Cleanup Sys. (98PBF00185)	PER 620	620-M-6
24	PBF024	Sumps, Primary Coolant Pump Oil (98PBF00179)	PER 620	620-M-6
25	PBF025	Sump – Control Rods Hydraulic Oil (98PBF00175	PER 620	
26	PBF026	Sump – Transient Rods Hydraulic Oil (98PBF00174)	PER 620	
27	PBF027	Sump – Primary Coolant Pump (98PBF00180)	PER 620	620-M-3
28	PBF028	Loop Makeup Water Tank (98PBF00163)	PER 620	
29	PBF029	HDW Surge Tank (molybdated water) (97PBF00066)	PER 620, 1st basement	10-M-15
30	PBF030	Knock Out Drum Tank (98PBF00072)	PER 620, 2nd basement	10-M-21

VCO Issue NEW-PBF-001 : Equipment List

Line No.	Tracking No.	Equipment Description	Location	Equipment ID Number
31	PBF031	Loop Makeup Deoxygenator (97PBF00064)	PER 620, 1st basement	620-10-M-14
32	PBF032	Ion Exchanger, Loop Cubicle 10, Resin (98PBF00073)	PER 620, 1st basement	10-M-10
33	PBF033	Ion Exchanger, Loop Cubicle 10, Resin (98PBF00074)	PER 620, 1st basement	10-M-11
34	PBF034	Rad Liquid Waste Strg Tank at PER 612 (97PBF00016)	PER 612	PER 751
35	PBF035	Fuel Oil Day Tank in PER 625 (97PBF00092)	PER 625	
36	PBF036	Air Reservoir 1 of 3 (97PBF00089)	PER 625	625-M-10
37	PBF037	Air Reservoir 2 of 3 (97PBF00090)	PER 625	625-M-11
38	PBF038	Air Reservoir 3 of 3 (97PBF00088)	PER 625	625-M-9
39	PBF039	LOCA Hot Water Tank (97PBF00068)	PER 620, 1st basement	
40	PBF040	Loop Makeup Demineralizer, Resin (97PBF00063)	PER 620, 1st basement	10-M-13
41	PBF041	Super Heated Pressurizer (98PBF00076)	PER 620, 1st basement	10-M-4
42	PBF042	LOCA Quench Tank (97PBF00070)	PER 620	11-M-3
43	PBF043	CRCA Air Compressor Oil, 200 gal (97PBF00065) CRCA Air Compressor Sump (98PBF00176)	PER620, 1st basement	620-M-37
44	PBF044	Primary Rx Coolant Water (AST) – 14k (98PBF00098)	PER 620, outside	PER 730

APPENDIX B: Description of Covered Matters with Tiered Milestones

VCO Number: NEW-TAN-008

Issue Title: Inadequate Hazardous Waste Determination and Unpermitted Storage at TAN-616 Low-Level Radioactive Waste System

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*
40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..*

Issue Description: The TAN 616 liquid waste treatment system building contains liquid low level radioactive waste treatment systems that were in operation until 1970. The liquid waste in the tank systems has been determined to have contained F001 (Trichloroethene) and may also exhibit the toxicity characteristic for some volatile organic compounds and heavy metals. Samples and sample waste from previous characterization efforts in 1993 and 1994 have been retained in containers within a TAA in TAN-607 in excess of 90 days. A complete hazardous waste determination has not been performed on the tank systems and the samples.

Action Summary: The list below contains the TAN-616 systems and samples that are addressed by this action. A list is also provided, for clarification purposes, of those components that are being addressed under the FFA/CO. A system identification will be performed for the TAN-616 tanks. A hazardous waste determination will be performed for the identified tank systems and the samples. If DOE determines further action is required, within 90 days of the Department's approval of the final hazardous waste determination, DOE will submit a Milestone deliverable which includes a description of interim actions, if necessary, along with a proposed schedule of further tiered Milestones and associated actions.

TAN 616 systems, vessels, ancillary equipment, and samples addressed under this action plan are:

a) TAN-616 systems, vessels, and ancillary equipment:

Inventory #	Tank #	Description	Comments
98TAN00420	E-1	Condenser	
98TAN00427	V-5	Liquid Waste Head Tank	
98TAN00428	V-6	Liquid Waste Cyclone Separator	
98TAN00429	V-7	Liquid Waste Evaporator	
98TAN00430	V-8	Liquid Waste Receiver Tank	
98TAN00421	V-11	Water Tank	

Inventory #	Tank #	Description	Comments
98TAN00417		Holding Tank (15 gal)	Not depicted on plans, photo is available. Located in operating pump room and includes small vacuum tank.
		Piping and ancillary equipment from TAN-616 to the PM2A tanks and injection well that are not being managed by CERCLA	
		Ancillary components associated with the liquid waste evaporator system including sumps, piping, and lead shielding	

b) TAN-616 Samples (Samples are being stored in compliance with all requirements with the exception of the 90-day storage limit):

Drum 1

WINCO Log#	B&W #	# of Samples	Notes
93-121414	93L-101470	2 sample bottles	
93-121414	93L-101476	1 sample bottle	
93-121414	93L-101468	1 sample bottle	
93-121414	93L-101474	5 sample bottles	Sample sites # 68, 70, 72, 74, and 76 may be on bottles
93-121414		5 VOA bottles	Labeled as TAN VOA aliquots 68, 70, 72, 74, and 76

Drum 2

WINCO Log#	B&W #	# of Samples	Notes
94-031714	94L-100477	1 sample	
94-031714	94L-100478	1 sample	
94-031714	94L-100479	1 sample	

c) TAN-616 components being managed by CERCLA (and are not part of this action) include:

Inventory #	Tank #	Description	Comments
98TAN00416	1703-1	V-1, Liquid Waste Collection Tank (UST)	WAG 1, TSF-09/18
98TAN00423	1703-2	V-2, Liquid Waste Collection Tank (UST)	WAG 1, TSF-09/18
98TAN00424	1703-3	V-3, Liquid Waste Collection Tank (UST)	WAG 1, TSF-09/18
98TAN00431	1710	V-9, Sand Filter, aka Sand Trap	WAG 1, TSF-09/18

APPENDIX B: Description of Covered Matters with Tiered Milestones

Inventory #	Tank #	Description	Comments
		Ancillary components, including interconnecting piping, from where the lines are cut and capped at valve box 1704 to just outside TAN-616, and surrounding soils on the east side of TAN-616.	WAG 1, TSF-09/18
98TAN00414	1704	Valve Pit	WAG 1, TSF-21
98TAN00425	1709	V-4, Liquid Waste Caustic Storage (UST)	WAG 1, TSF-19
	V-13, V-14	PM-2A tanks and contaminated soils in the proximity	WAG 1, TSF-26
		TAN Injection Well	WAG 1, TSF-05
		Contaminated soils surrounding the TAN-616 Building (with the exception of the soils on the east side of the building that are covered by TSF-09/18	New Site Identification Form

APPENDIX B: Description of Covered Matters with Tiered Milestones

Interim Actions: None specified.

Action Description	Milestone
Complete a hazardous waste determination and disposition the samples identified above as item b).	03/31/01
Complete a system identification for the portions of TAN-616 not managed under the FFA/CO and uniquely identify components addressed under this action plan.	03/31/01
Complete a hazardous waste determination for the systems identified above as items a).	12/31/02
Submit proposed schedule for further Milestones and description of any interim actions.	90 days following approval of previous Milestone

VCO Number: SITE-TANK-004

Issue Title: Active Hazardous Waste Tank Systems that have not been Closed or Included on the Part A or Part B Permit Application

Citation:

IDAPA 16.01.05.006 [40 CFR § 262.34 (b)] states:

"A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR parts 264 and 265 and the permit requirements of 40 CFR part 270 unless he has been granted an extension to the 90-day period. Such extension may be granted by EPA if hazardous wastes must remain on-site for longer than 90 days due to unforseen, temporary, and uncontrollable circumstances. An extension of up to 30 days may be granted at the discretion of the Regional Administrator on a case-by-case basis."

IDAPA 16.01.05.012 [40 CFR § 270.10 (e)(1)(i & ii)] state:

"Existing HWM facilities and interim status qualifications. (1) Owners and operators of existing hazardous waste management facilities or of hazardous waste management facilities in existence on the effective date of statutory or regulatory amendments under the act that render the facility subject to the requirements to have a RCRA permit must submit part A of their permit application no later than: (i) Six months after the date of publication of regulations which first require them to comply with the standards set forth in 40 CFR part 265 or 266, or (ii) Thirty days after the date they first become subject to the standards set forth in 40 CFR part 265 or 266, whichever first occurs."

Idaho Code 39-4408 (1) states:

"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste, or any constituent thereof, may enter the environment, unless the department has issued said person a permit or a variance as required for the specific activity involved or exempted the activity from permit requirements."

Issue Description: The tanks and/or components listed in table "SITE-TANK-004" are hazardous waste tanks and/or ancillary equipment. The tanks and/or ancillary equipment are not included in a Part A or B permit application, and DOE has not received interim status, a permit, variance or been exempted from the permit requirements.

Action Summary: DOE will evaluate the tanks and/or components listed in the table and determine their status (tank, ancillary equipment, or not part of a tank system). DOE will assign the tanks and/or components to a specific tank system. DOE will notify the Department whether the tanks will continue to operate as hazardous waste tanks and will be added to the facility's Part A and/or Part B permit application or will be closed. DOE shall submit this information to the Department for review and approval. Within 120 days of the department's approval of the tank specific evaluation, DOE shall submit a schedule of further milestones for closing or bringing the tank systems into compliance with all permit and/or interim status requirements.

Interim Actions: None specified.

Action:

Action Description	Milestone
Mark each tank or component listed in SITE-TANK-004 with a unique identifier. Evaluate status of each item listed in SITE-TANK-004 and determine whether it is a tank, ancillary equipment or not part of the tank system. For those items determined to be not part of a tank system, provide a justification for why the tank is not part of a tank system. Assign all tanks and ancillary equipment to a tank system. Submit this information to the Department for review and approval.	09/30/00
Evaluate all tanks and ancillary equipment identified in the previous Milestone to determine compliance with all applicable interim status requirements as stated in 40 CFR part 265. For those tanks and components that do not meet all applicable interim status requirements, provide a list of actions and a schedule for bringing the tanks and components into compliance with the requirements. Submit this information to the Department for review and approval.	120 days following approval previous Milestone

VCO ISSUE - SITE-TANK-004: Active Hazardous Waste Tanks to be Placed on Part A/B Permit (Site-wide)

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC		CPP-YARD	VES-WL-135	VESSEL IN SUMP SU-WL-135	98CPP01602	ACTIVE WASTE	RCRA (H/TBD)
INTEC		CPP-YARD	VES-WL-136	VESSEL IN SUMP SU-WL-136	98CPP01603	ACTIVE WASTE	RCRA (H/TBD)
INTEC	CALCINE SOLID STORAGE FACILITY	CPP-729	CYC-WCS-915	CYCLONE SEPARATOR, WS1	98INTEC01650	ACTIVE WASTE	RCRA (H/TBD)
INTEC	CALCINE SOLID WASTE STORAGE FACILITY	CPP-742	CYC-WCS-911	CYCLONE SEPARATOR, WS2	98INTEC01651	ACTIVE WASTE	RCRA (H/TBD)
INTEC	CALCINE SOLID WASTE STORAGE FACILITY	CPP-746	CYC-WCS-912	CYCLONE SEPARATOR, WS3	98INTEC01652	ACTIVE WASTE	RCRA (H/TBD)
INTEC	LIQUID EFFLUENT TREATMENT & DISPOSAL	CPP-1618	VES-WL-195	BOTTOMS TANK	98CPP00041	ACTIVE WASTE	RCRA (H/TBD)
INTEC	LIQUID EFFLUENT TREATMENT & DISPOSAL	CPP-1618	VES-WLK-197	AF FEED HEAD TANK	98CPP00039	ACTIVE WASTE	RCRA (H/TBD)
INTEC	LIQUID EFFLUENT TREATMENT & DISPOSAL	CPP-1618	VES-WLK-199	SEPARATOR #1	98CPP00040	ACTIVE WASTE	RCRA (H/TBD)
INTEC	LIQUID EFFLUENT TREATMENT & DISPOSAL	CPP-1618	VES-WLL-198	SEPARATOR #2	98CPP00042	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-104	FEED TANK	98CPP01154	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-107	HIGH EFFICIENCY CYCLONE	98CPP01156	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-109	QUENCH TOWER	98CPP01158	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-110	MIST ELIMINATOR	98CPP01159	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-111	VENTURI SCRUBBER K.O. DRUM	98CPP01160	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-112	RUTHENIUM ADSORBER	98CPP01161	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-113	RUTHENIUM ADSORBER	98CPP01162	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-114	RUTHENIUM ADSORBER	98CPP01163	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-116	MIST COLLECTOR	98CPP01164	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-124	WASTE OIL TANK, QUENCH PUMP	98CPP01168	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-136	VESSEL VENT CONDENSER KO DRUM	98CPP01169	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-143-1	INTERCOOLER KNOCKOUT DRUM	98CPP01170	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-143-2	INTERCOOLER KNOCKOUT DRUM	98CPP01171	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCC-511	VENTURI SCRUBBER	98CPP01176	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-659	VES-NCR-173	HEAD TANK	98CPP01212	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-760	CYC-WS4-916	CYCLONE SEPARATOR, WS4	98INTEC01653	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-765	CYC-WS5-917	CYCLONE SEPARATOR, WS5	98INTEC01654	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-791	VES-WS6-161	SOLIDS DISTRIBUTOR ASSEMBLY	98CPP01463	ACTIVE WASTE	RCRA (H/TBD)
INTEC	NWCF	CPP-791	VES-WS6-918	CYCLONE SEPARATOR	98CPP01465	ACTIVE WASTE	RCRA (H/TBD)

VCO ISSUE - SITE-TANK-004: Active Hazardous Waste Tanks to be Placed on Part A/B Permit (Site-wide)

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	PEW	CPP-604	HE-WL-300	HEAT EXCHANGER - PEW EVAPORATOR SEE HE-WL-300 161	98CPP00646	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	HE-WL-308	HEAT EXCHANGER FOR EVAPORATOR WL-129	98CPP00649	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-108	WASTE EVAPORATOR CONDENSATE KNOCK-OUT POT	98CPP00682	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-109	HEAD FEED TANK	98CPP00645	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-131	SURGE TANK	98CPP00696	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-134	VESSEL	98CPP00699	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-138	IN SUMP SU-WL-138	98CPP00700	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-139	IN SUMP SU-WL-139	98CPP00701	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-142	10 GALLON TANK IN SU-WL-142	98CPP00702	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-604	VES-WL-144	25 GALLON TANK IN SU-WL-144	98CPP00703	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-649	VES-OGF-104	CONDENSER (FOR VOG & DOG FROM CPP-601 604, WCF, NWCF)	98CPP01130	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-649	VES-OGF-106	OFF-GAS SUPERHEATER	98CPP01131	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-649	VES-OGF-132	OFF-GAS DEMISTER	98CPP01132	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-649	VES-WL-137	VESSEL IN SUMP SU-WL-137	98CPP01134	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-WM	SU-DVB-D-4	SUMP; VALVE BOX SUMP	98CPP01539	ACTIVE WASTE	RCRA (H/TBD)
INTEC	PEW	CPP-WM	VES-WM-192	MIST ELIMINATOR FOR TANK FARM VOG	98CPP01584	ACTIVE WASTE	RCRA (H/TBD)

APPENDIX B: Description of Covered Matters with Tiered Milestones

VCO Number: SITE-TANK-005

Issue Title: Tanks and/or Components That Require a Hazardous Waste Determination or Verification of Empty

Citation: IDAPA 16.01.05.006 [40 CFR 262.11] states in relevant part:
"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."

Issue Description: Table "SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty" includes a list of active waste tanks, inactive waste tanks and inactive process/product tanks. The tanks may be empty, but DOE has not verified the tanks are empty. If the tanks contain waste, DOE has not determined if the waste is hazardous or non-hazardous

Action Summary: To effectively manage the activities required under this action plan, DOE shall organize the tanks into systems. The proposed systems shall be submitted to the Department for review and approval. DOE shall complete hazardous waste determinations for the tank systems or verify the tanks are empty within specific systems. DOE shall prioritize these actions based on the following top three priorities for completion of the waste determination and/or verification of empty:

1. Tank systems containing residue that would pose a potential high risk to human health or the environment. As these tank systems are identified, actions shall be taken to minimize the risk to human health and the environment;
2. Active hazardous waste tank systems that will be permitted; and
3. Identification of Solid Waste Management Units that may need to be addressed in the Federal Facility Agreement/Consent Order.

DOE shall submit the hazardous waste determinations or verification of empty for the tank systems to the Department for review and approval in accordance with the Milestones listed in this action plan. If the tank system is not empty and is determined to contain non-hazardous waste, DOE shall evaluate whether the tank system has a potential for release to the environment and shall include this evaluation with the hazardous waste determination.

Following the approval of the hazardous waste determination:

1. If the tank system is determined to contain non-hazardous waste and:
   A. If the potential for release is low, no further action will be required pursuant to this Consent Order and the tank system will be moved to Appendix C – Covered Matters that are Closed, or
   B. If the tank system does have a potential for release to the environment, DOE shall evaluate the results from the hazardous waste determination performed above to determine if the tank system contains hazardous waste constituents as listed in Part 261 Appendix VIII and should be recommended for inclusion in the Federal Facility Agreement/Consent Order, or;
2. If the tank system is determined to contains hazardous waste, DOE shall;
   A. Submit a description of proposed interim actions; and
   B. Submit a proposed schedule of further milestones.

Following the approval of a verification of empty determination:

1. For inactive process/product tanks systems, no further action will be required pursuant to this Consent Order and the tank system will be moved to Appendix C – Covered Matters that are Closed.

Action Summary Cont:

2. For inactive hazardous waste tank systems, DOE shall submit a proposed schedule for further Milestones and a list of proposed interim actions to the Department for review and approval. The proposed interim actions should address preventing the entrance of waste, product, precipitation or material into the tank; or
3. For inactive non-hazardous waste tank systems, no further action will be required pursuant to this Consent Order and the tank system will be moved to Appendix C – Covered Matters that are Closed.

Interim Actions: None specified.

Action:

Action Description	Milestone
Complete system identification for all tanks and/or components on the attached table. Mark each tank or component with the unique identifier listed in SITE-TANK-005, except where worker safety issues prevent such action. Submit this information to the Department for review and approval pursuant to Section 9.5 of the Consent Order.	03/31/01
Perform hazardous waste/empty determinations on 5% of the tanks. For tanks determined to be empty, state whether the tanks were process/product tanks, non-hazardous waste tank or a hazardous waste tank.	09/30/01
For hazardous waste tank systems identified in the previous milestone, submit a proposed schedule for further milestones and a description of proposed interim actions.	90 days following approval of previous milestone
Perform hazardous waste/empty determinations on 15% of the tanks. For tanks determined to be empty, state whether the tanks were process/product tanks, non-hazardous waste tanks or hazardous waste tanks.	09/30/02
For hazardous waste tank systems identified in the previous Milestone, submit a proposed schedule for further Milestones and a description of proposed interim actions.	90 days following approval of previous milestone
Perform hazardous waste/empty determinations on 30% of the tanks. For tanks determined to be empty, state whether the tanks were process/product tanks, non-hazardous waste tanks or hazardous waste tanks.	09/30/03
For hazardous waste tank systems identified in the previous milestone, submit a proposed schedule for further milestones and a description of proposed interim actions.	90 days following approval of previous milestone
Perform hazardous waste/empty determinations on 50% of the tanks. For tanks determined to be empty, state whether the tanks were process/product tanks, non-hazardous waste tanks or hazardous waste tanks.	09/30/04
For hazardous waste tank systems identified in the previous milestone, submit a proposed schedule for further milestones and a description of proposed interim actions.	90 days following approval of previous milestone
Perform hazardous waste/empty determinations on 75% of the tanks. For tanks determined to be empty, state whether the tanks were process/product tanks, non-hazardous waste tanks or hazardous waste tanks.	09/30/05
For hazardous waste tank systems identified in the previous milestone, submit a proposed schedule for further milestones and a description of proposed interim actions.	90 days following approval of previous milestone
Perform hazardous waste/empty determinations on 100% of the tanks. For tanks determined to be empty, state whether the tanks were process/product tanks, non-hazardous waste tanks or hazardous waste tanks.	09/30/06
For hazardous waste tank systems identified in the previous milestone, submit a proposed schedule for further milestones and a description of proposed interim actions.	90 days following approval of previous milestone

Example of method for calculating tank completion percentages.
If 500 tanks were listed in Table SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty,

The first deliverable would be met by submitting 25 (500 x 5%) hazardous waste determinations and/or empty determinations.

The next deliverable would be met by submitting 50 additional hazardous waste determinations and/or empty determinations to bring the cumulative number submitted to 75 (500 x 15%).

The next deliverable would be met by submitting 75 additional hazardous waste determinations and/or empty determinations to bring the cumulative number submitted to 150 (500 x 30%).

The next deliverable would be met by submitting 100 additional hazardous waste determinations and/or empty determinations to bring the cumulative number submitted to 250 (500 x 50%).

The next deliverable would be met by submitting 125 additional hazardous waste determinations and/or empty determinations to bring the cumulative number submitted to 375 (500 x 75%).

The next deliverable would be met by submitting the remaining 125 hazardous waste determinations and/or empty determinations to bring the cumulative number submitted to 500, or the total number of tanks on the table.

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
CFA	CFA	CF-602		SUMP, WATER	98CFA00033	ACTIVE WASTE	NEW RCRA (ND)
CFA	CFA	CF-603		WARM DRAIN TANK	98CFA00041	INACTIVE WASTE	NOT REG - EMPTY (ND)
CFA	CFA	CF-603		HOT WATER TANK	98CFA00040	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
CFA	CFA	CF-603		WATER SOFTENER BRINE TANK	98CFA00036	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
CFA	CFA	CF-625	188625-TK-01	WASTE COLLECTION TANK, (UST)	98CFA00091	INACTIVE WASTE	NOT REG - EMPTY (ND)
CFA	CFA	CF-633		AIR COMPRESSOR	98CFA00097	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
CFA	CFA	CF-633	HW200136	HOT WATER TANK	98CFA00105	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
CFA	CFA	CF-650	2WC400081	RESIN TANK	98CFA00133	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
CFA	CFA	CF-650	CF-717	SUMP WITH PUMP	98CFA00142	INACTIVE WASTE	NOT REG - EMPTY (ND)
CFA	CFA	CF-664		HOT WATER TANK	98CFA00391	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
CFA	CFA	CF-664		SUMP, OIL/WATER SEP	98CFA00170	INACTIVE WASTE	NEW RCRA (ND)
CFA	CFA	CF-664		OIL/WATER SEPARATOR	98CFA00168	INACTIVE WASTE	NEW RCRA (ND)
CFA	CFA	CF-666		SUMP	98CFA00395	ACTIVE WASTE	NEW RCRA (ND)
CFA	CFA	CF-668		SUMP W/PUMP	98CFA00353	INACTIVE WASTE	NOT REG - EMPTY (ND)
CFA	CFA	CF-688		SUMP	98CFA00424	ACTIVE WASTE	NEW RCRA (ND)
CFA	CFA	CF-690		AIR COMPRESSORS (1 OF 2)	98CFA00272	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
CFA	CFA	CF-690		SUMP (2 OF 2), W/ PUMPS	98CFA00397	ACTIVE WASTE	NEW RCRA (ND)
CFA	CFA	CF-690		SUMP, DEEP, VAULT	98CFA00350	ACTIVE WASTE	NEW RCRA (ND)
CFA	EBR-I	CF-601		COLD WATER STORAGE TANK	98CFA00360	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC		CPP-YARD	SU-WL-135	SUMP; D5 VAULT SUMP	98CPP01597	ACTIVE WASTE	NEW RCRA (ND)
INTEC		CPP-YARD	SU-WL-136	SUMP; D6 VAULT SUMP	98CPP01598	ACTIVE WASTE	NEW RCRA (ND)
INTEC	ANALYTICAL LABORATORIES	CPP-602	VES-LC-145	VACUUM SURGE DRUM FOR CPP-602 BASEMENT LABS	98CPP00270	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	CEN-F-400	CENTRIFUGE	98CPP00067	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	CEN-F-401	CENTRIFUGE	98CPP00068	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	EVP-H-130	FIRST CYCLE PRODUCT EVAPORATOR	98CPP01615	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	HE-H-300	EVAPORATOR CONDENSER-H CELL	98CPP01621	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-B-108	SUMP	98CPP00070	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-HV-100	SUMP	98CPP00077	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-K-107	FLOOR SUMP	98CPP00079	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-L-116	SUMP	98CPP00080	ACTIVE WASTE	NEW RCRA (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-M-115	FLOOR SUMP	98CPP00082	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-S-113	SUMP, FLOOR	98CPP00095	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-U-132	SUMP	98CPP00096	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-VT-109	FLOOR SUMP	98CPP00097	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-VT-110	FLOOR SUMP	98CPP00098	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-W-131	FLOOR SUMP	98CPP00099	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WG-102	FLOOR SUMP	98CPP00100	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WH-102	FLOOR SUMP	98CPP00101	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WJ-101	FLOOR SUMP	98CPP00102	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WJ-102	FLOOR SUMP	98CPP00103	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WK-104	FLOOR SUMP	98CPP00104	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WK-105	FLOOR SUMP	98CPP00105	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WK-106	FLOOR SUMP	98CPP00106	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WK-107	FLOOR SUMP	98CPP00107	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-WK-108	FLOOR SUMP	98CPP00108	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	SU-Y-142	FLOOR SUMP	98CPP00109	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	TK-PO-121	SURGE AIR TANK FOR F-CELL CENTRIFUGE SKIMMERS	98CPP00112	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-C-101	TRANSFER TANK	98CPP00114	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-C-102	KNOCK OUT POT	98CPP00115	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-101	ZIRCONIUM DISSOLVER AHEAD OF CONDENSER VES-E-300	98CPP00134	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-102	COARSE FEED ADJUSTMENT TANK	98CPP00135	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-103	FINES FEED ADJUSTMENT TANK	98CPP00136	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-106	CHARGING WATER TANK	98CPP00139	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-108	FEED REWORK TANK	98CPP00140	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-109	CONDENSATE COLLECTION TANK (E-301)	98CPP00141	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-110	DEPLETED OFF-GAS SCRUB COLLECTION TANK	98CPP00142	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-151	SIR DISSOLVER (IDLE)	98CPP00145	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-E-153	FINE FEED ADJUSTMENT TANK	98CPP00146	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-F-101	CENTRIFUGE MANIFOLD TANK	98CPP00150	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-F-105	COLLECTION TANK, CLARIFIED SOLUTION, FOR CEN-F-400	98CPP00151	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-F-106	COLLECTION TANK, CLARIFIED SOLUTION, FOR CEN-F-401	98CPP00152	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-F-107	SLURRIED SOLIDS CATCH TANK	98CPP00153	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-F-108	SLURRIED SOLIDS CATCH TANK	98CPP00154	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-101	ALUMINUM DISSOLVER	98CPP00168	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-105	DISSOLVER RUN TANK	98CPP00172	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-106	FIRST CYCLE FEED TANK	98CPP00173	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-108	REWORK TANK	98CPP00174	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-111	IA EXTRACTION COLUMN	98CPP00175	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-115	FIRST CYCLE WASTE RUN TANK	98CPP00178	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-116	FIRST CYCLE WASTE RUN TANK	98CPP00179	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-151	ALUMINUM DISSOLVER	98CPP00181	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-G-155	DISSOLVER RUN TANK	98CPP00185	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-100	IB COLUMN	98CPP00192	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-103	IC COLUMN	98CPP00195	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-108	ID COLUMN SCRUB COLLECTION TANK	98CPP00197	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-115	FIRST STAGE MIXER SETTLER	98CPP00199	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-116	SECOND STAGE MIXER SETTLER	98CPP00200	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-117	THIRD STAGE MIXER SETTLER	98CPP00201	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-118	SOLVENT RUN TANK	98CPP00202	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-131	SURGE POT AND COLLECTION POT FROM VES-H-130	98CPP00211	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-134	ID COLUMN	98CPP00213	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-H-145	SURGE TANK, CARBONATE RECYCLE	98CPP00222	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-117	ORGANIC CONDENSATE COLLECTION TANK	98CPP00224	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-125	CONTINUOUS EVAPORATOR	98CPP00229	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-127	PRODUCT STORAGE TANK	98CPP00230	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-128	PRODUCT STORAGE TANK	98CPP00231	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-131	PHASE SEPARATOR	98CPP00232	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-134	REWORK SOLUTION COLLECTION TANK	98CPP00233	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-J-135	REWORK SOLUTION COLLECTION TANK	98CPP00234	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-104	SOLVENT PLATE RECOVERY STILL	98CPP00235	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-105	PHASE SEPARATOR FOR K-104 STILL	98CPP00236	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-106	SOLVENT COLLECTION TANK	98CPP00237	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-109	PACKED COLUMN STEAM STRIPPER	98CPP00238	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-111	ORGANIC SURGE TANK	98CPP00240	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-112	ORGANIC SURGE TANK	98CPP00241	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-K-113	ORGANIC WASTE STORAGE TANK	98CPP00242	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-L-101	SOLUTION COLLECTION TANK	98CPP00244	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-L-102	SOLUTION COLLECTION TANK	98CPP00245	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-L-103	PRODUCT STORAGE TANK	98CPP00246	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-L-104	PRODUCT STORAGE TANK	98CPP00247	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-L-105	PHASE SEPARATOR	98CPP00248	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-L-130	EVAPORATOR	98CPP00262	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-N-125	FEED STORAGE TANK	98CPP00303	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PA-102	SUMP - AIR LIFT PIT	98INTEC01663	INACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-100-1	REPIPE VES-PM-100-1 ACID ADDITION	98CPP00361	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-101-0	HNO3 DISSOLVER FEED TANK #1	98CPP00363	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-102-0	HNO3 DISSOLVER FEED TANK #2	98CPP00365	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-104-0	CATALYST MAKEUP TANK	98CPP00369	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-105-0	CATALYST FEED TANK	98CPP00371	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-107-0	IBS FEED TANK	98CPP00373	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-108-0	ICX FEED TANK	98CPP00377	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-109-0	IDS FEED TANK (EXTRACTANT)	98CPP00380	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-110	IIBX FEED TANK	98CPP00382	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-110-0	IAX MAKEUP FEED TANK	98CPP00383	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-111	III BX FEED TANK	98CPP00386	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-111-0	STAGE II SOLVENT WASH MAKEUP TANK	98CPP00387	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-112	IV BX FEED TANK	98CPP00388	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-112-0	STAGE I SOLVENT WASH FEED TANK	98CPP00389	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-113	AMMONIUM HYDROXIDE HD TANK	98CPP00391	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-113-0	STAGE II SOLVENT WASH FEED TANK	98CPP00392	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-114-0	CAUSTIC MAKEUP TANK	98CPP00395	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-115-0	STAGE III SOLVENT WASH FEED TANK	98CPP00396	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-116-0	III AS MAKEUP TANK (INACTIVE)	98CPP00399	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-117	CHARGE WATER (BORIC ACID) HOLD TANK	98CPP00400	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-124	IIAS MAKEUP TANK	98CPP00407	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-124-0	AIR PULSER	98CPP00408	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-125-0	AIR PULSER	98CPP00410	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-126	II AS FEED TANK	98CPP00411	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-126-0	AIR PULSER	98CPP00412	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-127	IIIAS MAKEUP TANK	98CPP00415	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-129	II AS FEED TANK (INACTIVE)	98CPP00417	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-130	II-IIIBX MAKEUP TANK	98CPP00418	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-131	SOLVENT RECOVERY CAUSTIC FEED TANK	98CPP00419	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-133	IIIAS2 FEED TANK	98CPP00420	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-133-0	AIR PULSER	98CPP00421	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-135-0	I-III SOLVENT WASH MAKEUP TANK I/III SW	98CPP00424	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-164	COMPLEXER FEED TANK	98CPP00437	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-170	CENTRIFUGE DECON MAKEUP TANK	98CPP00442	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-175	COMPLEXER MAKEUP TANK	98CPP00446	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-180	HF ACID TANK	98CPP00451	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-186	CHROMIC ACID MAKEUP TANK	98CPP00453	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-188	HF ACID TANK	98CPP00454	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-PM-194	COOLING LOOP SURGE TANK	98CPP00455	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Q-120	EVAPORATOR OVERFLOW TANK	98CPP00476	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-T-100	HEXONE SOLVENT STORAGE TANK	98CPP00486	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-T-101	VESSEL SOLVENT FEED F-CELL	98CPP00487	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-T-102	VESSEL SOLVENT FEED G-CELL	98CPP00488	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-T-103	VESSEL SOLVENT FEED S-CELL	98CPP00489	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-101	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00490	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-102	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00491	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-103	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00492	INACTIVE WASTE	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-104	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00493	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-105	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00494	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-106	FIRST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00495	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-107	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00496	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-108	COLLECTION TANK	98CPP00497	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-111	COLLECTION TANK	98CPP00498	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-112	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00499	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-113	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00500	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-114	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00501	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-115	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00502	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-116	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00503	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-117	1ST HEXONE CYCLE QUEOUS RAFFINATE COLLECTION TANK	98CPP00504	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-118	COLLECTION TANK	98CPP00505	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-121	COLLECTION TANK	98CPP00506	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-122	1ST HEXONE CYCLE RAFFINATE COLLECTION TANK	98CPP00507	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-123	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00508	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-124	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00509	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-125	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00510	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-126	1ST HEXONE CYCLE AQUEOUS RAFFINATE COLLECTION TANK	98CPP00511	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-127	1ST HEXONE CYCLE RAFFINATE COLLECTION TANK	98CPP00512	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-128	COLLECTION TANK	98CPP00513	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-129	EVAPORATOR	98CPP00514	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-130	EVAPORATOR	98CPP00515	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-300	OFF GAS CONDENSER	98CPP00518	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-U-301	OFF-GAS CONDENSER	98CPP00519	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-101	COLLECTION TANK	98CPP00525	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-102	COLLECTION TANK FOR IIBR STREAM	98CPP00526	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-103	COLLECTION TANK FOR IIBR STREAM	98CPP00527	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-104	COLLECTION TANK FOR IIBR STREAM	98CPP00528	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-105	COLLECTION TANK FOR IIBR STREAM	98CPP00529	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-106	COLLECTION TANK FOR IIBR STREAM	98CPP00530	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-107	COLLECTION TANK FOR IIBR STREAM	98CPP00531	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-108	COLLECTION TANK FOR IIBR STREAM	98CPP00532	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-111	COLLECTION TANK	98CPP00533	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-112	COLLECTION TANK FOR IIBR STREAM	98CPP00534	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-113	COLLECTION TANK FOR IIBR STREAM	98CPP00535	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-114	COLLECTION TANK FOR IIBR STREAM	98CPP00536	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-115	COLLECTION TANK FOR IIBR STREAM	98CPP00537	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-116	COLLECTION TANK FOR IIBR STREAM	98CPP00538	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-117	COLLECTION TANK FOR IIBR STREAM	98CPP00539	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-118	COLLECTION TANKS FOR IIBR STREAM	98CPP00540	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-121	COLLECTION TANK DWG# H-32832 1/2 C	98CPP00541	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-122	COLLECTION TANK FOR IIBR STREAM	98CPP00542	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-123	COLLECTION TANK FOR IIBR STREAM	98CPP00543	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-124	COLLECTION TANK FOR IIBR STREAM	98CPP00544	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-125	COLLECTION TANK FOR IIBR STREAM	98CPP00545	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-126	COLLECTION TANK FOR IIBR STREAM	98CPP00546	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-127	COLLECTION TANK FOR IIBR STREAM	98CPP00547	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-128	COLLECTION TANK FOR IIBR STREAM	98CPP00548	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-W-129	SOLVENT BATCH TANK	98CPP00549	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-X-100	HALON VESSEL	98CPP00562	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-X-101	HALON VESSEL	98CPP00563	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-101	VESSEL	98CPP00564	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-102	COLLECTION TANK	98CPP00565	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-103	WASTE COLLECTION BANK	98CPP00566	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-104	COLLECTION TANK	98CPP00567	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-111	WASTE COLLECTION BANK	98CPP00568	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-112	COLLECTION TANK	98CPP00569	INACTIVE WASTE	NOT REG - EMPTY (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-113	WASTE COLLECTION TANK	98CPP00570	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-114	COLLECTION TANK	98CPP00571	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-121	VESSEL	98CPP00573	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-122	COLLECTION TANK	98CPP00574	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-123	ORGANIC COLLECTION BANK	98CPP00575	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-124	COLLECTION TANK	98CPP00576	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-131	ORGANIC COLLECTION BANK	98CPP00577	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-132	COLLECTION TANK	98CPP00578	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-133	ORGANIC COLLECTION BANK	98CPP00579	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-134	COLLECTION TANK	98CPP00580	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-140	WASTE EVAPORATOR	98CPP00581	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-150	SAMPLE COLLECTION TANK	98CPP00583	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-160	WASTE DILUTION TANK	98CPP00584	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Y-161	FEED TANK TO VES-H-100 ABANDONED PER WO 115031 12-8-88	98CPP00585	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Z-120	SUMP, Z-CELL VESSEL OFF-GAS KNOCKDOWN TOWER	98CPP00596	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-601	VES-Z-123	OFFGAS H2O SEPARATOR	98CPP00597	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	SU-LC-100	SUMP	98CPP00081	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	SU-LC-104	SUMP	98CPP00600	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	SU-LC-107	SUMP	98CPP00601	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	VES-LC-157	DENITRATOR NEW LOWER VESSEL NEW TOP CAP HEATERS & INSULATION	98CPP00605	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	VES-LC-158	PRODUCT COLLECTION VESSEL	98CPP00606	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	VES-LC-162	DENITRATOR OFF-GAS DEMISTER	98CPP00608	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-602	VES-LC-163	CONDENSATE COLLECTION VESSEL	98CPP00609	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC2-108	CENTRIFUGE SOLIDS WASH VESSEL	98CPP01076	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC2-121	HF SCRUBBER VESSEL	98CPP01079	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC2-151	DISSOLVER SURGE VESSEL	98CPP01080	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC2-152	(SEE DIS-HC2-152) DISSOLVER	98CPP01081	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC2-153	COMPLEXING VESSEL	98CPP01082	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC5-100	DISSOLVER, ELECTROLYTIC	98CPP01085	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC5-101	DISSOLVER, ELECTROLYTIC, SURGE TANK	98CPP01086	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HC5-102	SUMP, CELL-5	98CPP01087	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-640	VES-HO-101	FLASH TANK	98CPP01109	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-750	SU-YDA-750	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01435	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-751	SU-YDA-751	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01436	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-752	SU-YDA-752	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01438	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-753	SU-YDA-753	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01439	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL DISSOLUTION PROCESS	CPP-754	SU-YDA-754	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01441	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL PROCESSING (CHEMICAL STORAGE)	CPP-621	VES-CS-170	VAPOR TANK	98CPP00131	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-621 & 757	VES-CS-113	FLUOROBORIC ACID STORAGE TANK	98CPP00929	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SU-FT-248	SUMP, SERVICE WASTE	98CPP01246	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SU-FT-249	SUMP, CHEMICAL WASTE	98CPP01247	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SU-FT-534	SUMP, RAD. LIQUID WASTE	98CPP01248	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-12	SUMP, LINEAR LEAKAGE SUMP	98CPP01253	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-13	SUMP; LINER LEAKAGE SUMP	98CPP01254	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-14	SUMP; LINER LEAKAGE SUMP	98CPP01255	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-15	SUMP; LINER LEAKAGE SUMP	98CPP01256	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-16	SUMP; LINER LEAKAGE SUMP	98CPP01257	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-17	SUMP; LINER LEAKAGE SUMP	98CPP01258	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-18	SUMP; LINER LEAKAGE SUMP	98CPP01259	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-19	SUMP; LINER LEAKAGE SUMP	98CPP01260	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-20	SUMP; LINER LEAKAGE SUMP	98CPP01262	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-21	SUMP; LINER LEAKAGE SUMP	98CPP01263	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-22	SUMP; LINER LEAKAGE SUMP	98CPP01264	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-23	SUMP; LINER LEAKAGE SUMP	98CPP01265	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	SUMP-28	SUMP; TRUCK RECEIVING SUMP	98CPP01266	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	TK-FH-181	DISSOLUTION CHILLER ROOM EXPANSION TANK	98CPP01274	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-101	POISONED COOLING WATER SURGE VESSEL	98CPP01296	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-103	POISONED H&C LOOP MAKE-UP	98CPP01297	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-F[illegible]1-104	POISONED HEATING WATER SUPPLY VESSEL	98CPP01298	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-151	AL(NO3)3 MAKE-UP TANK	98CPP01299	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-154	HYDROFLUORIC ACID MAKE-UP TANK	99INTEC00004	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-157	CDSO4 POISONED WATER MAKE-UP TANK	98CPP01305	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-161	AL(NO3)3 FEED TANK	98CPP01307	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-161-1	PMS FEED TANK	98CPP01308	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-162	HNO3 FEED TANK	98CPP01309	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-162-1	PMS FEED TANK	98CPP01310	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-166	HYDROFLUORIC ACID FEED TANK	98CPP01311	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-166-1	PMS FEED TANK	98CPP01312	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-167	CDSO4 POISONED WATER FEED TANK	98CPP01313	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-170	CADMIUM NITRATE STORAGE TANK	98CPP01315	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-172	ZIRCONYL CARBONATE DISSOLVER	98CPP01317	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-173	ZIRCONYL NITRATE MAKE-UP TANK	98CPP01318	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-174	ZIRCONYL NITRATE FEED TANK	98CPP01319	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FM-179	CADMIUM SULFATE STORAGE TANK	98CPP01321	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FT-123	MAKEUP WATER DEIONIZER	98CPP01333	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FT-124	MAKEUP REGENERATION CAUSTIC DAY TANK	98CPP01334	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FT-125	REGENERATION DAY TANK	98CPP01335	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FT-133	FILTER BACKWASH HOLD TANK	98CPP01339	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-666	VES-FV-166	FLASH TANK	98CPP01357	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-727	VES-CS-169	FAST HF ACID TANK	98CPP01405	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-796	SU-YDB-796	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01474	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL REPROCESSING (FAST)	CPP-797	SU-YDA-797	SUMP; SUMP FOR SERVICE WASTE BUILDINGS AND WM-191 VAULT SUMP	98CPP01475	ACTIVE WASTE	NEW RCRA (ND)
INTEC	FUEL STORAGE	CPP-603	VES-SF-101	ION EXCHANGE VESSEL	98CPP00614	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	FUEL STORAGE	CPP-603	VES-SF-102	ION EXCHANGE VESSEL for Basin Water	98CPP00615	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	FUEL STORAGE	CPP-603	VES-SF-140	RO DEMINERALIZER ACID FEED TANK	98CPP00636	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	FUEL STORAGE	CPP-603	VES-SFE-133	EXISTING PORTABLE ACID TANK NEW ION EXCHANGE	98CPP00638	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	FUEL STORAGE	CPP-626	ST-SFE-102	SEPTIC TANK	98CPP00931	ACTIVE WASTE	NEW RCRA (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-100	CALCINER VESSEL, 30-CM	98CPP01017	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-104	SILICA GEL ADSORBER	98CPP01018	INACTIVE WASTE	NEW RCRA (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-107	BED PRODUCT CONTAINER	98CPP01019	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-108	FINES CONTAINER	98CPP01020	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-112	CONSTANT HEAD FEED TANK	98CPP01021	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-113	ACID ADDITION SYSTEM	98CPP01022	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-115	BED ADDITION VESSEL	98CPP01023	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-117	FEED BLEND TANK	98CPP01025	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-30CM-121	SCRUB HOLD TANK	98CPP01026	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-AFPP-4	COLLECT BOTTOMS PRODUCTS ACID FRAC PP	98CPP01032	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-AFPP-5	COLLECT FLUSH SOLUTION ACID FRAC PP	98CPP01033	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-CGS-2	CALCINE GRINDING SETUP PRODUCT COLLECTION/FILTER VESSEL	98CPP01036	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-FPP-101	FPP-DISSOLVER VESSEL	98CPP01037	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-FPP-102	FPP	98CPP01038	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	ICPP LABORATORY	CPP-637	VES-LBF-101	PACKED BED SCRUBBER FOR VENT FROM VES-100	98CPP01059	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-121	CONDENSATE POT 601 BOILER STEAM DRUM	98CPP00780	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-122	CONDENSATE POT 601 BOILER STEAM DRUM	98CPP00781	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-123	CONDENSATE POT 602 BOILER STEAM DRUM	98CPP00782	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-124	CONDENSATE POT 602 BOILER STEAM DRUM	98CPP00783	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-662	BOILER FEED WATER TANK	98CPP00844	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-663	PH ADJUSTMENT FEED VESSEL	98CPP00843	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-665	CATION TANK	98CPP00845	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-606	VES-UTI-666	CATION TANK	98CPP00846	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-656	VES-CA-100	SEPTIC TANK	98CPP01243	INACTIVE WASTE	NEW RCRA (ND)
INTEC	INTEC	CPP-656	VES-CA-101	SEPTIC TANK	98CPP01144	ACTIVE WASTE	NEW RCRA (ND)
INTEC	INTEC	CPP-657	VES-MG-100	SEPTIC TANK	98CPP01145	INACTIVE WASTE	NEW RCRA (ND)
INTEC	INTEC	CPP-662	VES-MA-107	SEPTIC TANK	98CPP01220	ACTIVE WASTE	NEW RCRA (ND)
INTEC	INTEC	CPP-663	VES-MA-110	MANIFOLD	98CPP01226	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-663	VES-MA-117	AIR RECEIVER PRESSURIZED RESERVOIR	98CPP01233	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DIS-FC-111	TRAIN 1 DISOLVER	98CPP01622	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DIS-FC-121	TRAIN 2 DISSOLVER	98CPP01623	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	INTEC	CPP-666	DIS-FC-131	TRAIN 3 DISSOLVER	98CPP01624	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-411	TRAIN 1 DEMISTER	98CPP01631	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-416	TRAIN 1 FIRST STAGE SCRUBBED OFF-GAS DEMISTER	98CPP01634	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-417	TRAIN 1 SECOND STAGE SCRUBBED OFF-GAS DEMISTER	98CPP01637	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-421	TRAIN 2 DEMISTER	98CPP01632	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-426	TRAIN 2 FIRST STAGE SCRUBBED OFF-GAS DEMISTER	98CPP01635	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-427	TRAIN 2 SECOND STAGE SCRUBBED OFF-GAS DEMISTER	98CPP01638	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-431	TRAIN 3 DEMISTER	98CPP01633	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-436	TRAIN 3 FIRST STAGE SCRUBBED OFF-GAS DEMISTER	98CPP01636	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	DM-FC-437	TRAIN 1 SECOND STAGE SCRUBBED OFF-GAS DEMISTER	98CPP01639	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	HE-FC-314	TRAIN 1 OFF-GAS CONDENSOR	98CPP01625	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	HE-FC-316	TRAIN 1 OFF-GAS HEATER	98CPP01628	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	HE-FC-324	TRAIN 2 OFF-GAS CONDENSOR	98CPP01626	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	HE-FC-326	TRAIN 2 OFF-GAS HEATER	98CPP01629	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	HE-FC-334	TRAIN 3 OFF-GAS CONDESOR	98CPP01627	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	HE-FC-336	TRAIN 3 OFF-GAS HEATER	98CPP01630	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	SCR-FC-116	TRAIN 3 OFF-GAS SCRUBBER	98CPP01640	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	SCR-FC-126	TRAIN 2 OFF-GAS SCRUBBER	98CPP01641	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC	CPP-666	SCR-FC-136	TRAIN 3 OFF-GAS SCRUBBER	98CPP01642	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	INTEC LABORATORY	CPP-627	VES-627-103	GLOVE BOX TANK	98CPP00938	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	LIQUID WASTE OPERATIONS	CPP-1619	SU-SAB-110	SUMP	98CPP00043	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-1682	SU-KRS-1682	SUMP	98CPP00056	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-1760	SU-KRS-1760-1	SUMP	98CPP00061	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-1760	SU-KRS-1760-2	SUMP	98CPP00062	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-659	VES-NCA-125	CONDENSATE COLLECTION UNIT	98CPP01150	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-659	VES-NCD-138	SOAK TANK	98CPP01183	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	NWCF	CPP-659	VES-NCD-139	SOAK TANK	98CPP01184	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	NWCF	CPP-694	VES-NCE-185	WASTE SOLVENT STORAGE TANK #2	98CPP01388	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-694	VES-NCE-186	WASTE SOLVENT STORAGE TANK #3	98CPP01389	ACTIVE WASTE	NEW RCRA (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	NWCF	CPP-760	VES-WS4-760	SUMP; WS4-VAULT	98INTEC01659	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-765	VES-WS5-765	SUMP; WS5-VAULT	98INTEC01660	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-791	VES-WS6-791	SUMP; WS6 VAULT	98CPP01464	ACTIVE WASTE	NEW RCRA (ND)
INTEC	NWCF	CPP-795	VES-WS7-795	SUMP; WS7-VAULT	98INTEC01661	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-604	HE-WL-302	CONDENSER, DWG# 1309-D-2	98CPP00715	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-604	SU-WL-101/102	FLOOR SUMP	98CPP00662	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-138	SUMP	98CPP00664	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-139	SUMP	98CPP00665	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-140	SUMP	98CPP00666	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-142	SUMP	98CPP00667	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-143	SUMP	98CPP00668	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-144	SUMP	98CPP00669	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-145	SUMP	98CPP00670	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-146	SUMP	98CPP00671	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-147	SUMP	98CPP00672	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	SU-WL-153	SUMP	98CPP00675	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-123	ION EXCHANGE COLUMN	98CPP00689	INACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-124	ION EXCHANGE COLUMN	98CPP00690	INACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-127	DEMISTER, VOG	98CPP00692	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-130	DEMISTER COLUMN	98CPP00695	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-155	CONDENSATE SYSTEM FLASH COLUMN	98CPP00706	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-156	CONDENSATE SYSTEM PUMP OUT PIT	98CPP00707	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-162	MIST ELIMINATOR	98CPP00711	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-165	CONDENSATE REMOVAL RECEIVER	98CPP00713	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WL-166	CONDENSATE COLLECTION VESSEL	98CPP00714	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WM-157	FLOOR SUMP	98CPP00720	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WM-158	FLOOR SUMP	98CPP00721	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WN-100	RARE GAS PLANT COLLECTION VESSEL	98CPP00726	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-604	VES-WN-101	RARE GAS PLANT COLLECTION VESSEL	98CPP00727	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-604	VES-WN-125	SHELL TANK	98CPP00740	INACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WN-141	CATALYTIC REDUCTION UNITS	98CPP00745	INACTIVE WASTE	NEW RCRA (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	PEW	CPP-604	VES-WN-142	CATALYTIC REDUCTION UNITS	98CPP00746	INACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WN-143	CATALYTIC REDUCTION UNITS	98CPP00747	INACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WN-144	CATALYTIC REDUCTION UNITS	98CPP00748	INACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-604	VES-WO-119	LIQUID NITROGEN STORAGE TANK	98CPP00765	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-604	VES-WO-129	LIQUID NITROGEN STORAGE TANK	98CPP01595	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-604	VES-WO-130	LIQUID NITROGEN TANK	98CPP01596	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	PEW	CPP-649	SU-WL-137	SUMP	98CPP01129	ACTIVE WASTE	NEW RCRA (ND)
INTEC	PEW	CPP-708	SU-WL-148	MAIN STACK SUMP	98CPP01392	ACTIVE WASTE	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-311	HEAT EXCHANGER	98CPP00651	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-316	HEAT EXCHANGER	98CPP00652	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-317	HEAT EXCHANGER	98CPP00653	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-322	HEAT EXCHANGER	98CPP00654	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-324-A	HEAT EXCHANGER	98CPP00655	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-324-B	HEAT EXCHANGER	98CPP00656	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-326	HEAT EXCHANGER	98CPP00657	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-326-B	HEAT EXCHANGER	98CPP00658	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	HE-WN-353	HEAT EXCHANGER	98CPP00659	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-102	TANK - Iodine Absorption Tower	98CPP00728	INACTIVE WASTE	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-103	TANK - Iodine Absorption Tower	98CPP00729	INACTIVE WASTE	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-107	RARE GAS RHODIUM CONVERTER	98CPP00730	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-108	RARE GAS PLANT RHODIUM CONVERTER	98CPP00731	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-109	RARE GAS PLANT RHODIUM CONVERTER	98CPP00732	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-110	SHELL TANK	98CPP00733	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-113	FILTER VESSEL OIL COALESCING	98CPP00734	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-114	TRICKLE BED REACTOR INLET FLAME ARRESTER	98CPP00735	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-115	HEAT EXCHANGER	98CPP00736	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-120	TRICKLE BED RECOMBINER CATALYST	98CPP00738	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-121	SECONDARY TRICKLE BED REACTOR	98CPP00739	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-157	RECYCLE SURGE TANK	98CPP00749	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-158A	KRYPTON HOLD TANK (PRE BOTTLING)	98CPP00750	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-158B	KRYPTON HOLD TANK (PRE BOTTLING)	98CPP00751	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-159	RARE GAS PLANT PRODUCT VESSEL	98CPP00752	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-160	RARE GAS PLANT CRYOGENIC UNIT	98CPP00753	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-161	DOG GAS COMPRESSORS SCRUB HOLD TANK	98CPP00754	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-162	PRIMARY COLUMN SEPARATES & PURIFIES GAS	98CPP00755	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-163	LIQUID NITROGEN SEPARATOR	98CPP00756	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-164	RARE GAS PLANT DISTILLATION COLUMN (BATCH STILL)	98CPP00757	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-166	RARE GAS PLANT DEMISTER	98CPP00758	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-168	DEMISTER FOR VES-WN-100	98CPP00759	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WN-169	DEMISTER FOR VES-WN-101	98CPP00760	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WO-100	CAUSTIC TANK RARE GAS PLANT	98CPP00764	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	RARE GAS PLANT (RGP)	CPP-604	VES-WO-120	LIQUID NITROGEN STORAGE TANK	98CPP00766	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-628	VES-WM-191	WASTE WATER DIVERSION HOLDING TANK	98CPP00943	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-717	VES-WM-103	FIRST STORAGE WASTE STORAGE FROM F-CELL	98CPP01397	INACTIVE WASTE	RCRA (I)
INTEC	TANK FARM	CPP-717	VES-WM-104	FIRST CYCLE WASTE STORAGE FROM F-CELL	98CPP01398	INACTIVE WASTE	RCRA (I)
INTEC	TANK FARM	CPP-717	VES-WM-105	FIRST CYCLE WASTE STORAGE FROM F-CELL	98CPP01399	INACTIVE WASTE	RCRA (I)
INTEC	TANK FARM	CPP-717	VES-WM-106	FIRST CYCLE WASTE STORAGE FROM F-CELL	98CPP01400	INACTIVE WASTE	RCRA (I)
INTEC	WASTE CALCINE FACILITY	CPP-729	VES-WS1-729	SUMP; WS1-VAULT	98INTEC01656	ACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	WASTE CALCINE FACILITY	CPP-742	VES-WS2-742	SUMP; WS2-VAULT	98INTEC01657	ACTIVE WASTE	NEW RCRA (ND)
INTEC	WASTE CALCINE FACILITY	CPP-746	VES-WS3-746	SUMP; WS3-VAULT	98INTEC01658	ACTIVE WASTE	NEW RCRA (ND)
PBF	WERF	PER-609	763	SEPTIC TANK	97PBF00046	ACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-630		SUMP, W/2 PUMPS	98TAN00645	INACTIVE WASTE	UNKNOWN
TAN	CTF (LOFT)	TAN-630		FUEL/WATER SEPARATOR TANK (2 OF 2)	98TAN00018	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		TANK	98TAN00027	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		FUEL FILTER TANK	98TAN00019	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		WATER SOFTENER (2 OF 2)	98TAN00656	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		WATER SOFTENER (1 OF 2)	98TAN00028	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		LIQUID NITROGEN TANK	98TAN00003	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		AIR COMPRESSOR	98TAN00664	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		SULFURIC ACID MIX TANK	98TAN00024	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TAN	CTF (LOFT)	TAN-630		FUEL/WATER SEPARATOR TANK (1 OF 2)	98TAN00020	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630		CAUSTIC MIX TANK	98TAN00015	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	109-A	FUEL OIL TANK	98TAN00029	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	109-B	DIESEL TANK (AST)	98TAN00030	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	B-103-C	SUMP, SPRAY WATER	98TAN00033	INACTIVE WASTE	UNKNOWN
TAN	CTF (LOFT)	TAN-630	C-T-16	CONDENSATE RECEIVER TANK	98TAN00035	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	C-T-17	BLOWDOWN SUPPRESSION TANK	98TAN00036	INACTIVE WASTE	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	DW-L-20	DEMINERALIZER	98TAN00039	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	DW-L-21	DEMINERALIZER	98TAN00040	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	DW-L-3	RESIN TANK (1 of 2) DEMINERALIZER	98TAN00041	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	HW-G-1	HOT WATER HEATER	98TAN00042	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	IA-L-6	AIR DRYER (2 OF 2)	98TAN00121	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	PA-C-1	PLANT AIR COMPRESSOR W/TANK	98TAN00047	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	PA-F-1	AIR OIL REMOVER	98TAN00048	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	PA-F-2	MOISTURE SEPARATOR	98TAN00049	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	PA-T-10	SURGE AIR TANK	98TAN00050	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	PA-T-114	AIR RECEIVER	98TAN00051	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	PIT 120	SUMP WITH PUMP	98TAN00021	INACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-630	SA-T-19A	AIR, VERTICAL TANK (1 OF 3)	98TAN00052	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	SA-T-19B	AIR, VERTICAL TANK (2 OF 3)	98TAN00053	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	SA-T-19C	AIR, VERTICAL TANK (3 OF 3)	98TAN00054	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-630	SP-105	SUMP/W PUMP	98TAN00055	INACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-631	DW-T-8A	DEMIN WATER TANK (AST)	98TAN00063	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-631	DW-T-8B	DEMIN WATER TANK (AST)	98TAN00064	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-631	IA-T-11	AIR TANK	98TAN00065	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-637	WH-C-10	AIR COMPRESSOR	98TAN00070	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		FILTER BANK (2 OF 3)	98TAN00080	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		FILTER BANK (1 OF 3)	98TAN00079	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		WATER TANK (1 OF 2)	98TAN00092	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN RECEIVER	98TAN00083	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (8 OF 12)	98TAN00699	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TAN	CTF (LOFT)	TAN-650		WATER TANK (2 OF 2)	98TAN00093	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		FILTER BANK (3 OF 3)	98TAN00081	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		CONDENSATE KEG	98TAN00074	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		BORON COLUMN TANK	98TAN00090	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		BORATED COOLING WATER TANK	98TAN00072	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (10 OF 12)	98TAN00701	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		SUMP, VALVE PIT	98TAN00087	INACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (6 OF 12)	98TAN00713	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (7 OF 12)	98TAN00698	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (9 OF 12)	98TAN00700	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (11 OF 12)	98TAN00702	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (12 OF 12)	98TAN00703	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (2 OF 12)	98TAN00707	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (3 OF 12)	98TAN00710	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANKS (1 OF 12)	98TAN00071	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NON LIQUID TANK	98TAN00695	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (5 OF 12)	98TAN00712	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650		NITROGEN TANK (4 OF 12)	98TAN00711	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	116	SUMP, COLD WASTE, W/PUMP (PIT)	98TAN00073	INACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-650	650-9	STEAM CONDENSATE TANK	98TAN00685	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	73A5470	NITROGEN TANK	98TAN00094	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	73A5471	NITROGEN TANK	98TAN00122	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	AC-T-50	BORIC ACID MIX TANK	98TAN00095	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	AC-T-51	PRIMARY COOLANT BATCH TANK	98TAN00096	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	AC-T-52	CHEMICAL ADDITION TANK	98TAN00097	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	B-206A	SUMP, WARM WASTE	98TAN00088	INACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-650	B-225	EXPANSION TANK (VESSEL)	98TAN00077	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	B-243-A	SUMP, EMERGENY CORE COOLING	98TAN00693	INACTIVE WASTE	UNKNOWN
TAN	CTF (LOFT)	TAN-650	B203-A	SUMP & PUMP, DECONTAMINATION AREA	98TAN00103	INACTIVE WASTE	NEW RCRA (ND)
TAN	CTF (LOFT)	TAN-650	DW-L-16	ION EXCHANGE RESIN TANK	98TAN00098	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	DW-L-19	ION EXCHANGE RESIN TANK	98TAN00099	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TAN	CTF (LOFT)	TAN-650	ECC-T-22-B	HEAT TRANSFER UNIT	98TAN00100	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	ECC-T-44-A	ACCUMULATOR (1 OF 2)	98TAN00101	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	HW-G-2	HOT WATER TANK	98TAN00102	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	PCC-T-2	CHEMICAL ADDITION TANK	98TAN00104	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	SC-14-16	TANK	98TAN00105	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	SC-T-118	HYDRAZINE TANK	98TAN00106	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	CTF (LOFT)	TAN-650	SC-T-119	AMMONIUM HYDRIDE TANK	98TAN00107	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TAN	TAN-687	687-1020	OIL/WATER SEPARATOR TANK	98TAN00289	ACTIVE WASTE	NEW RCRA (ND)
TAN	TSF		711-A	FUEL OIL TANK	98TAN00471	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF		711-B	FUEL OIL TANK	98TAN00472	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF		711-C	FUEL OIL TANK	98TAN00473	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-602		SILVER RECOVERY UNIT	98TAN00717	INACTIVE WASTE	NEW RCRA (ND)
TAN	TSF	TAN-602		SUMP, CONDENSATE, NO PUMP	98TAN00680	INACTIVE WASTE	NOT REG - EMPTY (ND)
TAN	TSF	TAN-602		HOT WATER HEATER	98TAN00679	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-602		AIR TANK	98TAN00297	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-602		AIR COMPRESSOR	98TAN00296	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-602	T-001	STEAM CONDENSATE TANK	98TAN00677	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-603	NONE	SUMP PIT / NO PUMP	98TAN00694	ACTIVE WASTE	NEW RCRA (ND)
TAN	TSF	TAN-607		RESIN BED TANK (2 OF 4)	98TAN00660	INACTIVE WASTE	NEW RCRA (ND)
TAN	TSF	TAN-607		DEIONIZER (2 of 2)	98TAN00355	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TAN	TSF	TAN-607		RESIN BED TANK (1 OF 4)	98TAN00665	INACTIVE WASTE	NEW RCRA (ND)
TAN	TSF	TAN-607		RESIN BED TANK (3 OF 4)	98TAN00661	INACTIVE WASTE	NEW RCRA (ND)
TAN	TSF	TAN-607		RESIN BED TANK (4 OF 4)	98TAN00662	INACTIVE WASTE	NEW RCRA (ND)
TAN	TSF	TAN-607		WASTE WATER COLLECTION TANK	98TAN00668	INACTIVE WASTE	NOT REG - EMPTY (ND)
TAN	TSF	TAN-607	TK-201	DEMIN. WATER TANK	98TAN00383	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TAN	TSF	TAN-609		CONDENSATE TANK/WITH PUMP	98TAN00681	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-609		STEAM CONDENSATE TANK	98TAN00682	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-609		AIR TANK	98TAN00397	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-623	NONE	ABANDONED RED TANK (4 OF 4)	98TAN00436	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-623	NONE	ABANDONED RED TANK (3 OF 4)	98TAN00435	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-623	NONE	ABANDONED RED TANK (2 OF 4)	98TAN00434	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

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FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TAN	TSF	TAN-623	NONE	ABANDONED RED TANK (1 OF 4)	98TAN00433	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-653		AIR TANK/COMPRESSOR	98TAN00446	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-653		AIR TANK/COMPRESSOR	98TAN00447	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-653	16	HOT WATER TANK (HEATER)	98TAN00676	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	TSF	TAN-653	17	HOT WATER HEATER	98TAN00687	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF		1743	SEWAGE LIFT STATION	98TAN00503	ACTIVE WASTE	NEW RCRA (ND)
TAN	WRRTF		1744	PROCESS WASTE WATER LIFT STATION	98TAN00504	ACTIVE WASTE	NEW RCRA (ND)
TAN	WRRTF	TAN-641		DIESEL FUEL DAY TANK	98TAN00524	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641		DE-AIRATED FEEDWATER HEATER TANK	98TAN00509	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641	641(AST)	DIESEL OIL TANK (AST)	98TAN00545	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641	747 SP	SUPPLY STEAM SEPARATOR	98TAN00551	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641	747-1	STEAM TANK	98TAN00552	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641	747-2	STEAM TANK	98TAN00553	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641	747-3	STEAM TANK	98TAN00554	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-641	747-4	STEAM TANK	98TAN00555	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-643	737	SEPTIC TANK AND SAND FILTERS	98TAN00619	INACTIVE WASTE	NEW RCRA (ND)
TAN	WRRTF	TAN-646		STEAM TANK	98TAN00579	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TAN	WRRTF	TAN-646		WATER TANK	98TAN00572	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ATR	TRA-670		SUMP, WARM WASTE TANK	98TRA00029	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670		SUMP, HOT WASTE TANK	98TRA00024	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670		NITRIC ACID ADDITION TANK, PCS	98TRA00017	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ATR	TRA-670	670-M-111	ION EXCHANGER, EAST WWTF	98TRA00507	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670	670-M-112	ION EXHANGE, WEST WWTF	98TRA00041	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670	670-M-115	SHIELDED CATCH BASKET, WWTF	98TRA00043	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670	670-M-116A	SEPARATOR, MOISTURE, WWTF	98TRA00044	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670	670-M-26	BPD REGEN. CAUSTIC /LDW INJECT.HEAT EX.	98TRA00076	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ATR	TRA-670	670-M-27	HOT WASTE TANK	98TRA00077	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670	670-M-28	WARM WASTE TANK	98TRA00078	ACTIVE WASTE	NEW RCRA (ND)
TRA	ATR	TRA-670	M-2E-70	MAKEUP TANK, BORON SYSTEM	98TRA00183	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ATR	TRA-670	M-2E-71	MAKEUP TANK, BORON SYSTEM	98TRA00184	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ATR	TRA-670	M-2E-78	MIX TANK, BORON SYSTEM	98TRA00185	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TRA	ETR		706	DELAY TANK	98TRA00360	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		PURIFICATION COLUMN	98TRA00253	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		ION EXCHANGE COLUMN	98TRA00246	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		PRESSURIZER	98TRA00249	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		ION EXCHANGE COLUMN	98TRA00244	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		HEAT EXCHANGER	98TRA00241	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		PRESSURIZER	98TRA00250	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		WATER PURIFICATION COLUMN 4 OF 4)	00TRA00007	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		WATER PURIFICATION COLUMN (2 OF 4)	00TRA00005	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		RESIN ADDITION COLUMN	98TRA00255	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		RESIN CATCH TANK	98TRA00257	INACTIVE WASTE	NEW RCRA (ND)
TRA	ETR	TRA-642		HOLD-UP TANK	98TRA00242	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		RESIN CATCH TANK	98TRA00256	INACTIVE WASTE	NEW RCRA (ND)
TRA	ETR	TRA-642		RESIN COLUMN (FAR)	98TRA00260	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		RESIN COLUMN (NEAR)	98TRA00261	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		RESIN ADDITION COLUMN	98TRA00254	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		PRESSURIZER TANK	98TRA00252	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		ION EXCHANGE COLUMN	98TRA00247	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		WATER PURIFICATION COLUMN (3 OF 4)	00TRA00006	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		CATCH TANK (WATER), ECC	98TRA00239	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		PRESSURIZER	98TRA00248	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		RESIN COLUMN	98TRA00258	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		CHEMICAL MIXING TANK	98TRA00240	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		ION EXCHANGE COLUMN	98TRA00510	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		SUMP, WARM WASTE	98TRA00266	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		ION EXCHANGE COLUMN	98TRA00243	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		SUMP, ROD DRIVE ACCESS ROOM	98TRA00264	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		RESIN COLUMN	98TRA00259	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642		SUMP, NEW SUMP PIT	98TRA00263	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		PRESSURIZER TANK	98TRA00251	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642		ION EXCHANGE COLUMN	98TRA00245	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TRA	ETR	TRA-642		SAMPLE HOLDING TANK	98TRA00262	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	599-A	CRUD GENERATORS	98TRA00268	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642	599-B	CRUD GENERATORS	98TRA00269	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642	599-C	CRUD GENERATORS	98TRA00270	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642	599-D	CRUD GENERATORS	98TRA00271	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642	599-E	CRUD GENERATORS	98TRA00272	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642	599-F	CRUD GENERATORS	98TRA00273	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	ETR	TRA-642	642-1	WARM WASTE TANK (#3)	98TRA00274	ACTIVE WASTE	NEW RCRA (ND)
TRA	ETR	TRA-642	642-103	SURGE TANK	98TRA00275	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	642-2	HOT WASTE TANK	98TRA00276	INACTIVE WASTE	NEW RCRA (ND)
TRA	ETR	TRA-642	642-501	REACTOR VESSEL	98TRA00277	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	642-60-7	COLD WASTE TANK	98TRA00278	INACTIVE WASTE	NEW RCRA (ND)
TRA	ETR	TRA-642	C-13/G-16	DECON SUPPLY TANK	98TRA00293	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	F-108	ION EXCHANGE COLUMN	98TRA00294	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	F-108A	ION EXCHANGE COLUMN	98TRA00295	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	F-108B	ION EXCHANGE RESIN COLUMN FOR PRIMARY COOLANT PURIFICATION	99TRA00002	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	F-503	PRESSURIZER TANK	98TRA00296	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	F-514A	ION EXCHANGE COLUMN	98TRA00297	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	F-514B	ION EXCHANGE COLUMN	98TRA00298	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	M-33	MAKEUP TANK	98TRA00300	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	M-34	EXHAUST TANK	98TRA00301	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-642	M-38	FILTER, HELIUM	98TRA00302	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		OIL TANK	98TRA00316	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		AIR HEATER #3	98TRA00305	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		SEPARATOR, #1	98TRA00318	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		SEPARATOR, #2	98TRA00319	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		DUMPSTER OIL TANK	98TRA00312	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		OIL ABSORBER #1	98TRA00314	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		COLLECTION TANK	98TRA00309	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		OIL ABSORBER #2	98TRA00315	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643		AIR HEATER #2	98TRA00304	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TRA	ETR	TRA-643		AIR HEATER #1	98TRA00303	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643	643-48	SUMP, COMPRESSOR BUILDING	98TRA00321	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643	643-60	AIR FILTER TANK	98TRA00322	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-643	643-61	AIR FILTER TANK	98TRA00323	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-26	CATION TANK NO. 1	98TRA00324	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-27	ANION TANK NO. 1	98TRA00325	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-28	CATION TANK NO. 2	98TRA00326	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-29	ANION TANK, NO. 2	98TRA00327	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-48	SUMP, SECONDARY PIPE PIT	98TRA00328	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-58	PH SYSTEM DEGASSING TANK	98TRA00329	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-644	644-68	SURGE TANK	98TRA00330	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-648	648-37	AIR RECEIVER, EMERGENCY DIESEL #1	98TRA00339	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-648	648-38	AIR RECEIVER, EMERGENCY DIESEL #2	98TRA00340	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-648	648-53	OIL FILTER TANK	98TRA00341	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-648	648-65	OIL FILTER TANK	98TRA00342	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-648	648-67	LUBE OIL TANK	98TRA00343	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-663		AIR RECEIVER PRESSURE RESEVOIR TANK, EMERGENCY DIESEL #2	00TRA00008	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-663		DIESEL STARTING FUEL TANK	00TRA00009	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-663		JACKETED WATER EXPANSION TANK	98TRA00350	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-663		TANK, LUBE OIL	98TRA00352	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-663		OIL FILTER TANK	98TRA00351	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-704	755	FILTER , PRIMARY (2) TANKS	98TRA00357	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-705	755	FILTER, SECONDARY, TANKS (2)	98TRA00233	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-706	706	DELAY TANK	98TRA00231	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-755	755-101	FILTER VESSEL, HOT	98TRA00285	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-755	755-102	FILTER VESSEL, HOT	98TRA00286	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	ETR	TRA-755	755-103	FILTER VESSEL, HOT	98TRA00287	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR		703	SUMP, COLD WASTE (PIT)	98TRA00513	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR		712	RETENTION BASIN INLET	98TRA00362	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR		716	SUMP, WARM WASTE TRANSFER	98TRA00514	ACTIVE WASTE	NEW RCRA (ND)
		MTR-603		CONCRETE SUMP	00TRA00001	ACTIVE WASTE	NEW RCRA (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TRA	MTR	MTR-603		CANAL SUMP PIT	00TRA00002	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-603		SLAB TANK, FPR FULL SCALE MOCKUP	98TRA00238	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-603		REACTOR VESSEL	98TRA00376	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-603		FLUIDIC SAMPLER MOCK-UP TANK	98TRA00237	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-603		H.E.D. ACCUMULATION TANK	98TRA00375	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-603		SUMP, REACTOR BUILDING SUMP	98TRA00379	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-603		TANK, MTR WARM SUMP	98TRA00378	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-603	314	REACTOR HOT DRAIN TANK	98TRA00380	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-604		MAKEUP TANK	98TRA00383	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	MTR	TRA-604		SCRUBBER, VENT	98TRA00384	INACTIVE PROCESS/PRODUCT	NEW RCRA (ND)
TRA	MTR	TRA-605		SUMP, CHEMICAL	98TRA00389	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-605	605-M-40	ION EXCHANGE #1	98TRA00392	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-605	605-M-41	ION EXCHANGE #2	98TRA00393	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-605	605A(AST)	WARM WASTE FEED TANK	98TRA00390	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-605	605B(AST)	HOT WASTE STORAGE TANK	98TRA00386	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-605	M-49	FILTER, WWTF SOUTH	98TRA00394	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	MTR	TRA-605	M-50	FILTER, WWTF NORTH	98TRA00395	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	MTR	TRA-609		SULFATE, TANK	98TRA00428	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-609		BOILER, #1 EAST	98TRA00422	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-609		DEAERATOR TANK	98TRA00424	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-609		BOILER, #3 WEST	98TRA00423	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-609		PHOSPHATE TANK	98TRA00425	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-609		SUMP, S PIT TANK	98TRA00429	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-609		BOILER , #2	98TRA00421	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-613	613A	SAMPLING STATION	98TRA00502	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-613	613B	SAMPLING STATION	98TRA00503	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-613	713-B	HOT WASTE STORAGE TANK, No.2 (UST)	98TRA00451	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-613	713-C	HOT WASTE STORAGE TANK No.3 (UST)	98TRA00452	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-613	713-D	HOT WASTE STORAGE TANK No.4 (UST)	98TRA00453	ACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-624		MANHOLE B	00TRA00014	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-624		SEWAGE TANK, DIGESTER	98TRA00460	INACTIVE WASTE	NOT REG - EMPTY (ND)

VCO ISSUE - SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
TRA	MTR	TRA-624		MANHOLE A	00TRA00016	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-624		CHLORINATION TANK	00TRA00017	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-624		EJECTOR PIT	00TRA00013	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-624		FINAL EFFLUENT TANK	00TRA00015	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-624	624-1	AIR RESERVOIR	98TRA00461	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-627	727-A	FUEL OIL TANK, EAST (AST)	98TRA00462	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-627	727-B	FUEL OIL TANK, WEST (AST)	98TRA00463	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		SUMP	98TRA00505	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		RECEIVER TANK W/2 PUMPS	99TRA00004	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-641		SCRUB TANK	98TRA00488	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-641		DEMISTER TANK	98TRA00536	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		PNEUMATIC TRANSPORT TANK	98TRA00486	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		GLASS MELTER	98TRA00485	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		AIR TANK	98TRA00482	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		CATCH TANK	98TRA00483	INACTIVE WASTE	NEW RCRA (ND)
TRA	MTR	TRA-641		MOCK UP TANK, PLEXIGLASS	98TRA00484	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
TRA	MTR	TRA-641		QUENCH TANK	98TRA00537	INACTIVE WASTE	NOT REG - EMPTY (ND)
TRA	MTR	TRA-712	712-E	RETENTION BASIN (EAST) (UST)	98TRA00363	CLOSED IN PLACE	NEW RCRA (ND)
TRA	MTR	TRA-712	712-W	RETENTION BASIN (WEST) (UST)	98TRA00364	CLOSED IN PLACE	NEW RCRA (ND)

VCO Number: VCO-5.1.II(a)

Issue Title: Inadequate hazardous waste determination on items in the MTR Canal at TRA

Citation:

40 CFR 262.11	*"A Person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste...."*

Issue Description: ECI 381 (TL 008RCRA96 and TL 005RCRA96) MTR and Canal.

A hazardous waste determination has not been performed on several items stored in the MTR Canal. The items include:

Item	Canal Location	Description
Trash cask liner (box)	55,N	60 cubic foot metal box composed of steel plates containing miscellaneous components
Trash can/bucket	38,S	Open Top, 18" D x 60" H with miscellaneous components
Bucket	39,S	Contains test train scrap components
Metal bucket	76,S	2 ½ gallon contains test train used parts
Plastic bucket	64,S	Contains test train flow meters and cloth
Metal bucket	79,S	Contains small test train components

Perform a hazardous waste determination on the items identified above. If any of the items or materials are determined to be hazardous waste, a schedule of Milestones for waste disposition, and a description of any proposed interim actions shall be submitted.

Interim Actions: None specified.

Action:

Action Description	Milestone
Complete Hazardous Waste Determination.	09/30/02
Submit proposed schedule for waste disposition and description of any interim actions.	90 days following approval of previous Milestone

APPENDIX B: Description of Covered Matters with Tiered Milestones

VCO Number: VCO-5.8.d

Issue Title: Storage of Hazardous Waste for Greater than 90 days Without a Permit or Interim Status and Inadequate Waste Determination on Contents of Tanks at TRA 630

Citation:

IDAPA 16.01.05.006 [40 CFR 262.11] states in relevant part:
"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."
Idaho Code 39-4408 (1) states:
"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."

Issue Description:

The TRA-730 Catch Tank System (CTS) includes: incoming drain lines from TRA laboratories and other operational facilities; discharge lines; a pump vault; a tank vault; and four (4) tanks identified as TRA-730-1, 730-2, 730-3, and 730-4 (tank inventory numbers 98TRA00468, 00470, 00472, and 00474). Tanks TRA-730-1 and 730-2 received liquid waste from the TRA-632 hot cells. Tank systems 730-3 and 730-4 received waste from the labs and other facilities.

Analytical work was first completed in 1996 and additional analytical work was completed in 1999. The 1999 effort determined that there were multiple phases of waste in tanks 730-1, 730-2 and 730-3. Each of these tanks contains a liquid phase, a flocculent solids phase, and a hard packed solid heel. TRA-730-4 was found to only contain liquid phase waste. No current analytical data is available for the heels in 730-1, 730-2 and 730-3. However, based on available characterization information, the tanks have been determined to contain regulated concentrations as follows: TRA-730-1 Lead; TRA-730-2 Chromium and Lead; TRA-730-3 Chromium, Lead, and Mercury; and TRA-730-4 Cadmium and Mercury. The TRA-730 tank system has not received interim status, a RCRA permit, variance or exemption for storing hazardous waste.

Action Summary:

Submit a draft closure plan and schedule for DEQ review and DOE revision for the TRA-730 tank system. The development of the draft closure plan is contingent on the ability to sample the solid heels in 730-1, 730-2 and 730-3. If, due to radiological considerations sampling of the heels is impacted, the Milestone for submittal of the draft closure plan may need to be renegotiated.

Interim Actions:

See attached matrix "TRA-730 Catch Tank System Compliance with 40 CFR 265 Interim Status Requirements". The liquids and solids in TRA-730-1, TRA-730-2, TRA-730-3 and TRA-730-4 may be removed and managed as RCRA waste prior to implementation of the RCRA closure plan.

Action:

Action Description	Milestone
Submit draft closure plan and schedule for Department review and DOE revision.	12/31/00

VCO 5.8.d - TRA-730 Catch Tank System (CTS) Compliance with 40 CFR 265 Interim Status Requirements

The following acronym is used throughout this table and is referenced here for clarity.

VCO Voluntary Consent Order is used to identify a requirement that is applicable to the CTS, but which TRA is unable to comply with because of the age or configuration of the CTS. Where DOE are seeking regulatory relief from a cited requirement through the VCO, this position will be noted by the use of the VCO acronym.

Number	Citation	Subject	In Compliance?	Comments/Interim Actions
1	265.13	Waste Analysis	Yes	Liquid phase wastes in the CTS tanks were sampled in 1-99, SAP # WGS-086-98. Tank heels and all other unique waste streams from the CTS will be analytically characterized and a hazardous waste determination completed prior to removal and treatment.
2	265.14	Security	Yes	INEEL security personnel control access to the TRA through the gate house, TRA-658. No unauthorized personnel are allowed to enter the facility area bounded by the TRA fence. The door to the TRA-630 building is locked and posted. The structure covering the manhole to the CTS tank vault is properly posted.
3	265.14(c)	Security postings	Yes	Access control signs are posted on the door to the barn located over the manhole access to the TRA-730 CTS tank vault and on the door to TRA-630, access to the TRA-730 CTS pump vault. Signs read, "Danger - Unauthorized Personnel Keep Out", and are legible from 25 feet.
4	265.15	Inspections	Yes	Qualified personnel perform daily inspections of the tank vault and tanks. The results of those daily inspections are recorded on log sheets. Tank level readings are taken along with a visual inspection of the tank vault using a remote video camera and monitor in the TRA-630 building.
5	265.16	Training.	Yes	INEEL and TRA specific training requirements have been identified for facility personnel and are formalized in the current revision of the "Catch Tank Training Requirements Matrix".
6	265.30 265.31	Owners / operators of hazardous waste facilities must maintain and operate them to minimize the possibility of releases.	Yes	The waste managed in the TRA-730 CTS is radioactive wastewater, with RCRA metals in excess of regulatory limits. The tanks are isolated, contained in a tank vault & pumps, are shut down & administratively controlled.
7	265.32	Facility communications or alarm systems & emergency response equipment	Yes	TRA procedures for emergency notification and communication are explained in the "INEEL Emergency Plan / RCRA Contingency Plan".

VCO 5.8.d - TRA-730 Catch Tank System (CTS) Compliance with 40 CFR 265 Interim Status Requirements

Number	Citation	Subject	In Compliance?	Comments/Interim Actions
8	265.33	Facility communications / alarm systems, fire protection equipment, & spill control equipment	Yes	Emergency equipment specified for this facility is properly maintained and tested.
9	265.34	Access to communications or alarm system	Yes	Qualified personnel carry a two-way radio during the normal round of inspections. This allows continuous communication with the Shift Supervisor (SS).
10	265.35	Emergency access and aisle space	NO – VCO	This requirement cannot be met. Because of the age of the system and its configuration, both the tank vault and pump vault are confined spaces with severe restrictions to and obstruction of access for emergency response. Along with the physical limitations, high radiation fields prevent a typical emergency response to an incident or event. Planning for all activities in either of the vaults will take into consideration the fact that the vaults are confined space without normal emergency access.
11	265.37	Arrangements with local authorities.	Yes	This requirement is satisfied by the "INEEL Emergency Plan / RCRA Contingency Plan".
12	265.50	Contingency plan & emergency procedures	Yes	These requirements are satisfied by the "INEEL Emergency Plan / RCRA Contingency Plan".
13	265.70 265.73	Operating record.	Yes	An "Operating Record" has been established for the TRA-730 CTS.
14	265.190 265.191	Requirements for hazardous waste tank systems and evaluation of components.	Yes	An Engineering Design File (EDF), serial # TRA-ATR-1269 was completed to verify condition of the TRA-730 CTS.
15	265.193	Requirements for secondary containment of HW tank systems.	Tanks, Yes Ancillary Equipment, NO – VCO	VCO – Secondary containment is not provided for all of the ancillary equipment. Improvements to the secondary containment system will not be implemented or otherwise addressed for the CTS as DOE has agreed to stop the operation of the system and close it according to an approved closure plan.

VCO 5.8.d - TRA-730 Catch Tank System (CTS) Compliance with 40 CFR 265 Interim Status Requirements

Number	Citation	Subject	In Compliance	Comments/Justifications
16	265.194	General operating requirements for compatibility of waste with system, prevention of spills and response to leaks or spills.	Yes	All drain lines have been removed from service so that the only addition of wastewater to the tanks is from pumping of the vault sump to the CTS tanks. Tank level information is recorded daily and the tank vault is inspected daily to confirm there is no leakage from the CTS. Overfilling of the tanks is not possible under the present conditions that are administratively controlled.
17	265.195	Owner operator requirements for tank system daily inspections.	Yes	Qualified personnel perform daily inspections of the tank vault and tanks. The results of those daily inspections are recorded on log sheets. Tank level readings are taken along with a visual inspection of the tank vault using a remote video camera and monitor in the TRA-630 building.
18	Subpart G and 265.197	Closure and post-closure care requirements.	Yes – VCO	VCO – The CTS is being managed under a VCO negotiated between the DEQ and DOE. A requirement of this enforceable agreement is to submit a formal Closure Plan for the CTS with the clear implication that DOE will then implement the closure plan as approved by DEQ.
19	265.1080	Air emission standards for tanks, surface impoundments and containers	NO – VCO	VCO – An air emissions control system will not be installed or otherwise addressed for the CTS as DOE has agreed to stop the operation of the system and close it according to an approved closure plan. DOE has stopped adding waste to the tank, the tanks are properly vented through the MTR stack, and they exclusively hold mixed hazardous wastes.

VCO Number: **NEW-TRA-004**

Issue Title: Fill, Store, & Remelt (FS&R) Facility in the ETR Building (sodium loop at the ETR)

Citation: 39-4408(1) *"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*

Issue Description: Components within the Fill, Storage, & Remelt (FS&R) Charging Facility (located in the ETR Building/ TRA-642) include a number of small tanks and ancillary piping that were partially drained upon deactivation. However, approximately 21 gallons of sodium exists in solid form that could not be drained. Two pressure instruments still in use at the facility contain 22 grams of sodium-potassium alloy (NaK) each. The sodium is a hazardous waste, and the NaK will become a hazardous waste when it is no longer needed to measure pressure. Both sodium and NaK exhibit the characteristic of reactivity. The sodium has been stored in excess of 90 days in a unit that does not have interim status or a hazardous waste permit, variance or exemption issued by the Department.

The tank system in the facility includes the following tanks and their ancillary equipment: tank inventory numbers 98TRA00279, 98TRA00280, 98TRA00281, 98TRA00282, 98TRA00283, 98TRA00284, 98TRA00288, 98TRA00289, 98TRA00290, 98TRA00291, and 98TRA00292.

Action Summary: The sodium and NaK will be removed from the FS&R Facility consistent with the requirements of the RCRA closure plan prepared under this action plan.

Interim Actions: See attached matrix "ETR Fill, Store and Remelt Facility Compliance with Interim Status Requirements for Storage."

Action:

Action Description	Milestone
Submit draft RCRA closure plan and schedule for Department review and DOE Revision.	09/30/00

ETR Fill Store and Remelt Facility compliance with Interim Status Requirements for storage*

Number	Citation	Subject	In Compliance?	Comments/Interim Actions
1	265.13	Waste Analysis	Yes	Historical characterization data on the sodium in the FSR facility has been reviewed and included in the operating record to document the waste analysis of the sodium. A waste analysis plan will not be developed since no additional waste will be received for storage.
2	265.14 [all except 14(c)]	Security	Yes	TRA is a secure facility with a perimeter fence surrounding the area. The fence is monitored by guards and video equipment. Entrance into TRA requires training and a security background check or an escort who meets these requirements. Further, the ETR facility (inside the TRA area) is under lock and key because it is a radiological buffer area. Finally, the FSR facility (inside the ETR facility) is under lock and key because the facility is not in use.
3	265.14 (c)	Inspections	Yes	Danger signs have been be posted on the entrances to the FSR facility
4	265.15 and 265.195		Yes (commenced and are ongoing as of June 30, 1999)	Daily inspections, including the development of a written schedule and completion of the appropriate documentation have been initiated
5	265.16	Training	Yes	Training program has been developed and personnel have received appropriate training
6	265.17 and 265.31	General requirements for ignitable, reactive, or incompatible wastes and maintenance and operation of facility	Yes	This waste (sodium) is in a solid form and is enclosed within stainless steel piping. This piping has a low-pressure argon gas blanket maintained in it to isolate the reactive waste from air and moisture. This keeps it separate and protected from sources of ignition or reaction. There are no sources for water to enter the FSR facility and it is located within a radiological buffer zone, TRA-642 (ETR reactor building). A radiological buffer zone prohibits eating, drinking, smoking, or chewing within its boundaries. NOTE: The reactive waste (sodium) is NOT radioactive.
7	265.32(a)	Required Equipment	Yes	The TRA voice paging system and emergency alarms are tested on a repetitive schedule and are verified audible in the ETR reactor building at the FS&R facility.
8	265.32(b)		Yes	A two-way radio is used during routine inspections

ETR Fill Store and Remelt Facility compliance with Interim Status Requirements for storage*

9	265.32(c)	Required Equipment (continued)	Yes	Fire extinguishers have been placed at each entrance and fire control equipment has been staged in a locker on the main reactor floor (TRA-642) in front of the FSR facility.
10	265.32(d)		NA	Water, or sprinkler system for fire suppression will not be allowed due to presence of sodium
11	265.33	Testing and maintenance of equipment	Yes	All required equipment are identified in the operating record and have been placed on a routine testing and maintenance schedule

ETR Fill Store and Remelt Facility compliance with Interim Status Requirements for storage*

Number	Citation	Subject	In compliance?	Comments/Interim Actions
12	265.34	Access to communications or alarms	Yes	Only required during inspections since the waste will not be poured, mixed, spread, or otherwise handled. A two-way radio is used during routine inspections.
13	265.35	Aisle space	See comment	Aisle space is sufficient to allow access to the FSR facility for emergency response personnel. However, aisle space in some areas in the FSR facility is limited. Since the facility will only be occupied during the inspections, the aisle space should be sufficient until closure of the facility occurs.
14	265.37	Arrangements with local authorities	Yes	The contingency plan has been revised and forwarded to the INEEL fire department. An inspection and tour of the FSR facility has been conducted with three shifts of the INEEL Fire Department.
15	265.50 through 265.56	Contingency plan and emergency procedures	Yes	The TRA contingency plan has been revised to include the FSR facility
16	265.70 through 265.77	Manifest System, record keeping and reporting	Yes	Manifesting requirements are not applicable since the FSR facility will not receive any new waste. The operating record for the FSR facility has been established and all applicable records will be maintained. The volume of the sodium in FSR will be included in the next biennial report
17	Subpart G and 265.197	Closure	See comment	Will submit draft closure plan per agreed upon VCO milestone
18	265.191	Tank integrity assessment	Yes	Integrity assessment has been completed and is included in the operating record
19	265.193	Containment and detection of releases	NA	The main portion of these regulations deal with secondary containment and leak detection devices for new tank, old tanks, etc, and ancillary equipment. Secondary containment and leak detection is not applicable based on 265.190 (a) "Tank systems used to store or treat hazardous waste which contains no free liquids and that are situated inside a building with an impermeable floor are exempted from the requirements of 265.193." Furthermore, daily inspections are being conducted of the FSR facility.

ETR Fill Store and Remelt Facility compliance with Interim Status Requirements for storage*

20	265.194	General operating requirements	Yes	An engineering evaluation has been completed demonstrating that the sodium is compatible with the FSR system. The remainder of the general requirements (e.g., preventing spills and overflows from operations) are not applicable since the sodium is in a solid form and no new waste is being added to the system
21	265.198(a)	Special requirements for reactive waste	Yes	This waste sodium is in a solid form and is enclosed within stainless steel piping. This piping has a low-pressure argon gas blanket maintained in it to isolate the reactive waste from air and moisture. This keeps it separate and protected from sources of ignition or reaction. There are no sources for water to enter the FSR facility and it is located within a radiological buffer zone, TRA-642 (ETR reactor building).
22	265.198(b)		Yes	An engineering evaluation has been completed to verify that the ETR building meets the NFPA distance and separation requirements
23	265.199	Special requirements for incompatible waste	NA	Not applicable since no waste will be added to the system.
24	265.200	Waste analysis and trial tests	NA	Not applicable since no waste will be added to the system.
25	265.202	Air emission standards	NA	Not applicable due to type of waste in system.

* Other requirements for closure will be addressed in the closure plan to be developed.

APPENDIX C

Description of Covered Matters that are Closed

VCO Number: CPP-666-F-3

Issue Title: Visual Inspection Through Window at INTEC FDP Cell

Citation:

40 CFR 265.174	*"Inspections – The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors."*

Issue Description: The high-efficiency particulate air (HEPA) filters currently stored in the mixed waste cell do not meet the inspection requirements found in 40 CFR 265.174. This is due to the fact that the containers emit an extremely high radiation field and can only be inspected from a cell window. When looking through the cell window, the condition of the container cannot fully be determined because only the tops of the drums can be seen.

Closure Date: The effective date of this Consent Order

Closure: The documentation to conduct visual inspections from the FDP cell shielded windows (or other means) is contained in two documents: (1) the RCRA Interim Status Document for CPP-666 FDP Cell Container Storage and (2) the RCRA Part B Permit Application for the Idaho National Engineering and Environmental Laboratory, Volume 18, Idaho Nuclear Technology and Engineering Center.

This issue was discussed in meetings on August 4 and 5, 1998. DEQ agreed with INEEL's request that inspection in this area can occur by looking through the cell shielded windows.

Appendix C: Description of Covered Matters that are Closed

VCO Number: NEW-RWMC-002

Issue Title: Disposal of Cadmium (Cd) Plated Filters in the RWMC SDA

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*
40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*

Issue Description: Cadmium plated filters have been disposed of in the SDA (Environmental Issues Log, item number 96 RCRA 19).

Closure Date: The effective date of this Consent Order.

Closure Description: A risk assessment addressing the disposal of the cadmium-plated HEPA filters generated at the NRF and disposed of at the RWMC was submitted by DOE on January 28, 1997. The State of Idaho responded to the DOE risk assessment on June 2, 1997. Based on the DEQ review and the June 2, 1997 response, this issue is considered closed.

Furthermore, eleven (11) boxes that were believed to contain cadmium plated HEPA filters were removed from the SDA and returned to WERF for uncompaction in late 1998. Any suspect cadmium HEPA filters found were returned to the NRF for appropriate disposition.

Appendix C: Description of Covered Matters that are Closed

VCO Number: NEW-TAN-003

Issue Title: Potential Treatment Without a Permit at TAN (TSF) Water System

Citation: 39-4408(1) *"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*

Issue Description: The drinking water system at TAN uses an air sparger to eliminate organics in the raw water. Because the ground water has been designated as containing a listed waste (F001), the air sparging could be considered a RCRA treatment.

Closure Date: The effective date of this Consent Order.

Closure Description: A "no longer contained in" determination for the TAN groundwater used for the TAN drinking water was received from the State of Idaho on March 6, 1998. Based on receipt of the "no longer contained in" determination, this issue is considered closed.

Appendix C: Description of Covered Matters that are Closed

VCO Number: NEW-TAN-004

Issue Title: Inadequate Hazardous Waste Determination on Rags at TAN-607/629/645/679

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*
40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*

Issue Description: In 1998, DOE identified several locations at TAN where solvents on rags/wipes may have been inappropriately characterized and subsequently dispositioned as non-hazardous, or non-LDR restricted wastes. Based on a review of solvents used at the locations, it was determined that two solvents, acetone and Freon TF (trichlorotrifluoroethane), had routinely been used in the past with rags/wipes, but had either been disposed as non-hazardous or non-LDR waste without characterization.

Closure Date: The effective date of this Consent Order.

Closure Description: DOE conducted facility walkthroughs at TAN to locate materials containing listed solvents, and either discontinued use, or ensured waste rags/Q-tips that continue to be generated are appropriately characterized by knowledge or testing for hazardous waste and LDR characterization/ management. A risk assessment to determine potential human health impacts of past acetone and trichlorofluoroethane disposal to the CFA landfill was complete.

The risk assessment determined that the disposal did not pose a significant risk to human health or the environment based on the small volumes disposed. A summary assessment report was submitted to DEQ on December 24, 1998. The State of Idaho reviewed the DOE summary assessment report. Based on the DEQ review, this issue is considered closed.

VCO Number: NEW-TRA-007

Issue Title: Abandoned Buried Piping at TRA (four sets of lines)

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*
40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*

Issue Description: There are a number of abandoned, inactive, buried product lines at TRA:

Abandoned buried acid line from TRA-631 to TRA-645, ETR secondary pump house (1,600 feet of 3-inch pipe) used to transfer acid from the bulk acid tanks to use in the ETR secondary coolant systems. Abandoned about 1981.

Abandoned buried acid line TRA-631 to TRA-671, ATR secondary pump house (1,000 feet of 2-inch pipe) used to transfer acid from the bulk acid tanks to use in the ATR secondary coolant systems. Abandoned about. 1992.

Abandoned buried fuel oil lines from bunker fuel tanks TRA-727 A&B to TRA-609 (500 feet of 3-inch pipe). Used to transfer #5 fuel to the old steam plant boilers. Abandoned in the late 1980's.

Abandoned buried diesel fuel line from TRA-727C & D and TRA-775 fuel tanks to ETR (1,900 feet of 2-inch pipe) used to transfer diesel fuel to three diesel engines at ETR. Abandoned in early 1980's (ETR was inactivated in 1981).

Closure Date: The effective date of this Consent Order.

Closure Description: New site identification forms were submitted for this abandoned buried piping. The sites met the requirements for inactive waste sites requiring further investigation under the INEEL FFA/CO. INEEL FFA/CO Responsible Program Managers approved the forms in March 1999. The four sites were designated as control areas TRA-57, TRA-58, TRA-59 and TRA-60.

Appendix C: Description of Covered Matters that are Closed

VCO Number: SITE-TANK-006

Issue Title: INTEC Tank Farm Tanks to be Closed Under the NON Consent Order (see list).

Citation:

40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*
40 CFR 265.113(a)	*"Within 90 days after receiving the final volume of hazardous wastes, or the final volume of non-hazardous wastes if the owner or operator complies with all applicable requirements in paragraphs (d) and (e) of this section, at a hazardous waste management unit or facility, or within 90 days after approval of the closure plan, whichever is later, the owner or operator must treat, remove from the unit or facility, or dispose of on-site, all hazardous wastes in accordance with the approved closure plan."*

Issue Description: Several INTEC Tank Farm Tanks were identified in the INEEL tank inventory project as requiring some regulatory action. The Notice of Noncompliance (NON) Consent Order addresses the cease use or upgrade and closure of the INTEC Tank Farm Tanks. In order to ensure coordination of activities, the INTEC Tank Farm tanks identified under the INEEL tank inventory project as requiring regulatory actions will be addressed under the actions to be taken under the NON Consent Order.

Closure Date: The effective date of this Consent Order

Closure Description: In a meeting on August 25, 1998, DOE and DEQ agreed that the VCO INTEC tanks associated with the INEEL Tank Farm tanks should be removed from the VCO and any necessary actions for these tanks should be addressed as ancillary equipment to the INTEC Tank Farm tanks and will be covered under the NON Consent Order, Sections III and IV.

VCO ISSUE - SITE-TANK-006: INTEC Tank Farm Tanks to be Closed Under the NON Consent Order

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	TANK FARM	CPP-604	HE-WM-302	VENT CONDENSER FOR WM-100, 101, 102	98CPP00725	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-604	VES-WM-178	SUBMERGENCE POT	98CPP00722	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-604	VES-WM-179	DISENGAGING POT	98CPP00723	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-604	VES-WM-193	MIST ELIMINATOR	98CPP00724	INACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-619	VES-WM-107	COOLING WATER SURGE TANK	98CPP00884	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-619	VES-WM-140	COOLING WATER SURGE TANK	98CPP00885	INACTIVE PROCESS/PRODUCT	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-628	VES-WM-301	VESSEL	98CPP00944	INACTIVE WASTE	NOT REG - EMPTY (ND)
INTEC	TANK FARM	CPP-717-A	SU-WM-103	SUMP, FIRST STORAGE WASTE STORAGE FROM F-CELL	98CPP01616	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-717-B	SU-WM-104	SUMP; FIRST STORAGE WASTE STORAGE FROM F-CELL	98CPP01618	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-717-C	SU-WM-105	SUMP; FIRST STORAGE WASTE STORAGE FROM F-CELL	98CPP01619	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-717-D	SU-WM-106	SUMP; FIRST STORAGE WASTE STORAGE FROM F-CELL	98CPP01620	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-729	HE-WM-302	TANK FARM OFF GAS CONDENSER	98INTEC01664	INACTIVE WASTE	RCRA (H/TBD)
INTEC	TANK FARM	CPP-WM	CONTROL PIT 1	SUMP; CONTROL PIT FOR WM-186	98CPP01487	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CONTROL PIT 2	SUMP; CONTROL PIT FOR WM-187 & WM-188	98CPP01488	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CONTROL PIT 3	SUMP; CONTROL PIT FOR WM-189 & WM-190	98CPP01489	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CPP-721	CONDENSER (PIT FOR CONDENSER VES-WM-382 (WM-181))	98CPP01490	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CPP-722	CONDENSER (PIT FOR CONDENSER VES-WM-383 (WM-183 & 185))	98CPP01491	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CPP-723	SUMP; RELIEF PIT FOR WM-184	98CPP01492	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CPP-737	CONDENSER (PIT FOR CONDENSER VES-WM-300)	98CPP01493	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	CPP-743	CONDENSER (PIT FOR CONDENSER VES-WM-387)	98CPP01494	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	RELIEF PIT 1	SUMP; RELIEF PIT FOR WM-180	98CPP01495	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	RELIEF PIT 2	SUMP; RELIEF PIT FOR WM-181	98CPP01496	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-A-5	SUMP; DIVERSION VALVE BOX SUMP	98CPP01497	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-A-6	SUMP; DIVERSION VALVE BOX SUMP	98CPP01498	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-A-7	SUMP; DIVERSION VALVE BOX SUMP	98CPP01499	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-1	SUMP; DIVERSION VALVE BOX SUMP	98CPP01500	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-10	SUMP; DIVERSION VALVE BOX SUMP	98CPP01501	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-11	SUMP; VALVE BOX SUMP	98CPP01502	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-2	SUMP; DIVERSION VALVE BOX SUMP	98CPP01503	ACTIVE WASTE	NEW RCRA (ND)

VCO ISSUE - SITE-TANK-006: INTEC Tank Farm Tanks to be Closed Under the NON Consent Order

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	TANK FARM	CPP-WM	SU-DVB-B-3	SUMP; DIVERSION VALVE BOX SUMP	98CPP01504	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-4	SUMP; DIVERSION VALVE BOX SUMP	98CPP01505	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-5	SUMP; DIVERSION VALVE BOX SUMP	98CPP01506	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-6	SUMP; DIVERSION VALVE BOX SUMP	98CPP01507	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-7	SUMP; DIVERSION VALVE BOX SUMP	98CPP01508	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-8	SUMP; DIVERSION VALVE BOX SUMP	98CPP01509	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-B-9	SUMP; DIVERSION VALVE BOX SUMP	98CPP01510	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-10	SUMP; DIVERSION VALVE BOX SUMP	98CPP01511	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-11	SUMP; DIVERSION VALVE BOX SUMP	98CPP01512	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-12	SUMP; VALVE BOX SUMP	98CPP01513	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-14	SUMP; DIVERSION VALVE BOX SUMP	98CPP01514	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-15	SUMP; DIVERSION VALVE BOX SUMP	98CPP01515	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-16	SUMP; DIVERSION VALVE BOX SUMP	98CPP01516	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-18	SUMP; VALVE BOX SUMP	98CPP01517	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-19	SUMP; DIVERSION VALVE BOX SUMP	98CPP01518	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-2	SUMP; DIVERSION VALVE BOX SUMP	98CPP01519	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-21	SUMP; DIVERSION VALVE BOX SUMP	98CPP01520	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-22	SUMP; DIVERSION VALVE BOX SUMP	98CPP01521	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-23	SUMP; DIVERSION VALVE BOX SUMP	98CPP01522	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-24	SUMP; VALVE BOX SUMP	98CPP01523	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-25	SUMP; VALVE BOX SUMP	98CPP01524	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-27	SUMP; VALVE BOX SUMP	98CPP01525	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-28	SUMP; VALVE BOX SUMP	98CPP01526	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-29	SUMP; VALVE BOX SUMP	98CPP01527	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-3	SUMP; DIVERSION VALVE BOX SUMP	98CPP01528	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-30	SUMP; VALVE BOX SUMP	98CPP01529	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-31	SUMP; VALVE BOX SUMP	98CPP01530	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-32	SUMP; VALVE BOX SUMP	98CPP01531	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-37	SUMP; VALVE BOX SUMP	98CPP01532	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-4	SUMP; DIVERSION VALVE BOX SUMP	98CPP01533	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-5	SUMP; DIVERSION VALVE BOX SUMP	98CPP01534	ACTIVE WASTE	NEW RCRA (ND)

VCO ISSUE - SITE-TANK-006: INTEC Tank Farm Tanks to be Closed Under the NON Consent Order

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	TANK FARM	CPP-WM	SU-DVB-C-6	SUMP; DIVERSION VALVE BOX SUMP	98CPP01535	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-7	SUMP; DIVERSION VALVE BOX SUMP	98CPP01536	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-8	SUMP; DIVERSION VALVE BOX SUMP	98CPP01537	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-C-9	SUMP; DIVERSION VALVE BOX SUMP	98CPP01538	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-ESB182	SUMP; DIVERSION VALVE BOX SUMP	98CPP01540	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-ESB183	SUMP; DIVERSION VALVE BOX SUMP	98CPP01541	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-ESB184	SUMP; DIVERSION VALVE BOX SUMP	98CPP01542	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-ESB185	SUMP; DIVERSION VALVE BOX SUMP	98CPP01543	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-ESB186	SUMP; DIVERSION VALVE BOX SUMP	98CPP01544	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-JB-7	SUMP; DIVERSION VALVE BOX SUMP	98CPP01545	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-DVB-JB-8	SUMP; DIVERSION VALVE BOX SUMP	98CPP01546	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-180N	TANK FARM HOT SUMP	98CPP01547	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-180S	SUMP; TANK FARM COLD SUMP	98CPP01548	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-181S	SUMP; TANK FARM COLD SUMP	98CPP01549	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-182N	SUMP; TANK FARM HOT SUMP	98CPP01550	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-182S	SUMP; TANK FARM COLD SUMP	98CPP01551	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-183N	SUMP; TANK FARM HOT SUMP	98CPP01552	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-183S	SUMP; TANK FARM COLD SUMP	98CPP01553	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-184N	SUMP; TANK FARM COLD SUMP	98CPP01554	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-184S	SUMP; TANK FARM HOT SUMP	98CPP01555	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-185S	SUMP; TANK FARM COLD SUMP	98CPP01557	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-185S	SUMP; TANK FARM HOT SUMP	98CPP01556	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-186N	SUMP; TANK FARM HOT SUMP	98CPP01558	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-186S	SUMP; TANK FARM COLD SUMP	98CPP01559	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-187N	SUMP; TANK FARM HOT SUMP	98CPP01560	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-187S	SUMP; TANK FARM COLD SUMP	98CPP01561	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-188N	SUMP; TANK FARM COLD SUMP	98CPP01562	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-188S	SUMP; TANK FARM HOT SUMP	98CPP01563	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-189C	SUMP; TANK FARM COLD SUMP	98CPP01564	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-189N	SUMP; TANK FARM HOT SUMP	98CPP01565	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-189N	SUMP; TANK FARM COLD SUMP	98CPP01566	ACTIVE WASTE	NEW RCRA (ND)

VCO ISSUE - SITE-TANK-006: INTEC Tank Farm Tanks to be Closed Under the NON Consent Order

FACILITY	AREA	BLDG #	TANK #	TANK DESCRIPTION	INVENTORY TRACKING #	OPERATIONAL STATUS	REGULATED
INTEC	TANK FARM	CPP-WM	SU-WM-190C	SUMP; TANK FARM COLD SUMP	98CPP01567	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-190N	SUMP; TANK FARM COLD SUMP	98CPP01568	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-190S	SUMP; TANK FARM HOT SUMP	98CPP01569	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-382S	SUMP, CONDENSER PIT	98CPP01570	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-383S	SUMP, CONDENSER PIT	98CPP01571	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	SU-WM-387	SUMP; CONDENSER PIT	98CPP01572	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	VES-WM-300	OUTLINE & DETAILS OF ITEM# WM-300 VENT CONDENSER FOR WM-180	98CPP01591	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	VES-WM-382	CONDENSER	98CPP01592	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	VES-WM-383	CONDENSER (183 VOG)	98CPP01593	ACTIVE WASTE	NEW RCRA (ND)
INTEC	TANK FARM	CPP-WM	VES-WM-387	CONDENSER (187 VOG)	98CPP01594	ACTIVE WASTE	NEW RCRA (ND)

Appendix C: Description of Covered Matters that are Closed

VCO Number: VCO-5.1.a

Issue Title: Inadequate Hazardous Waste Determinations on Legacy Samples Sitewide.

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*
40 CFR 261.2(a)(1)	*"[A] solid waste is any discarded material that is not excluded by § 261.4(a) or that is not excluded by variance granted under §§ 260.30 and 260.31."*
40 CFR 262.11	*"[A] person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste..."*

Issue Description: TL 037RCRA96 Sitewide—Approximately 23,196 legacy samples have been collected from around the INEEL. ECI and TL issues #43 (RWMC Landfill Stabilization Project) and #46 (TL 050RCRA96) TAN IET Box of 30-40 samples will be handled under the Legacy Sample management. [ECI #43 and ECI #46 are closed].

Closure Date: The effective date of this Consent Order.

Closure Description: All of the legacy samples were inventoried, characterized, and dispositioned as documented in the report, INEEL/EXT-98-00157 "LMITCO Legacy Sample Disposition Project (LSDP) Final Plan". The Final Plan was transmitted to DEQ on March 16, 1998. DEQ conducted a review of selected samples and related disposition documentation on April 15 - 17, 1998. Based on their review, DEQ agrees with the INEEL approach for legacy sample disposition.

Appendix C: Description of Covered Matters that are Closed

VCO Number: VCO-5.1. r

Issue Title: INTEC Tank Farm Soil stored in North Portion of INTEC

Citation:

39-4408(1)	*"No person shall treat or store hazardous waste, nor shall any person discharge, incinerate, release, spill, place, or dispose any hazardous waste in such a manner that the waste or any constituent thereof, may enter the environment, unless the Department has issued said person a permit or variance as required for the specific activity involved or exempted the activity from permit requirements."*

Issue Description: ECI 198 CPP—Excavated Tank Farm soil, inside the north fence, in the Soil Pile N Fence area.

CPP Soil Pile N Fence—A large pile of excavated soil is located inside the North INTEC fence. The soil came from excavations at the tank farm. Many CERCLA sites at the INTEC are contaminated with leaks from pipes or tanks that contain RCRA listed and characteristic waste. Soil contaminated by such leaks may contain RCRA listed waste and must be managed and disposed according to RCRA. It has been determined that these soils contain listed waste.

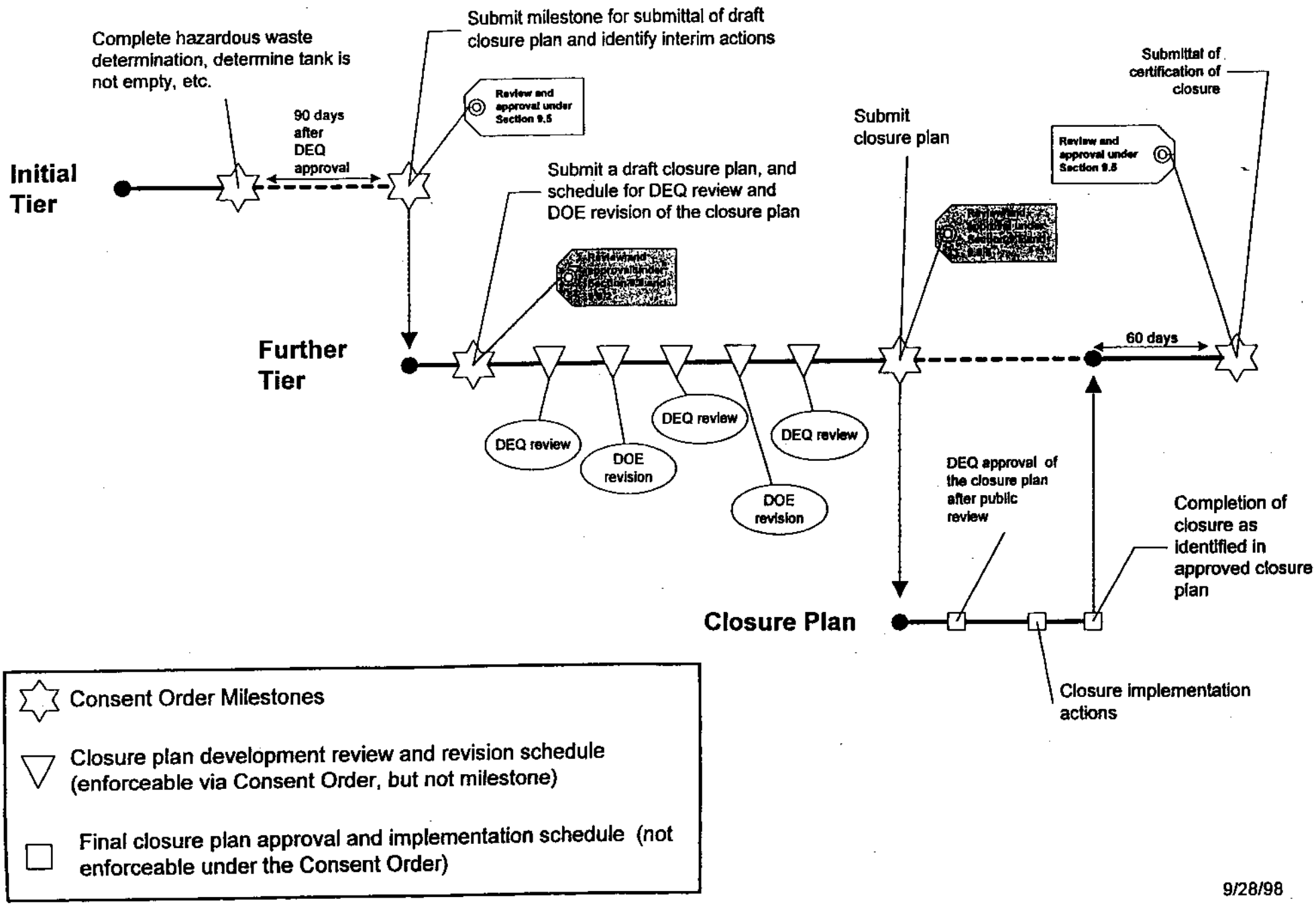
Closure Date: The effective date of this Consent Order

Closure Description: The soil piles from the Tank Farm Project consist of two piles. The piles are 1430 and 70 cubic yards respectively. The piles met the requirements for inactive waste sites requiring further investigation under the INEEL FFA/CO. INEEL FFA/CO Responsible Program Managers approved the forms in October 1998. The site was designated as control area "CPP-97". The Final Record of Decision Idaho Nuclear Technology and Engineering Center (DOE/ID-10660, September 1999) addressed these soil piles including ultimate disposition in the INEEL CERCLA Disposal Facility (ICDF). Until removed for ultimate disposition, the soil piles will be inspected weekly, covered and have a liner, and barriers and signs will be maintained.

Appendix D

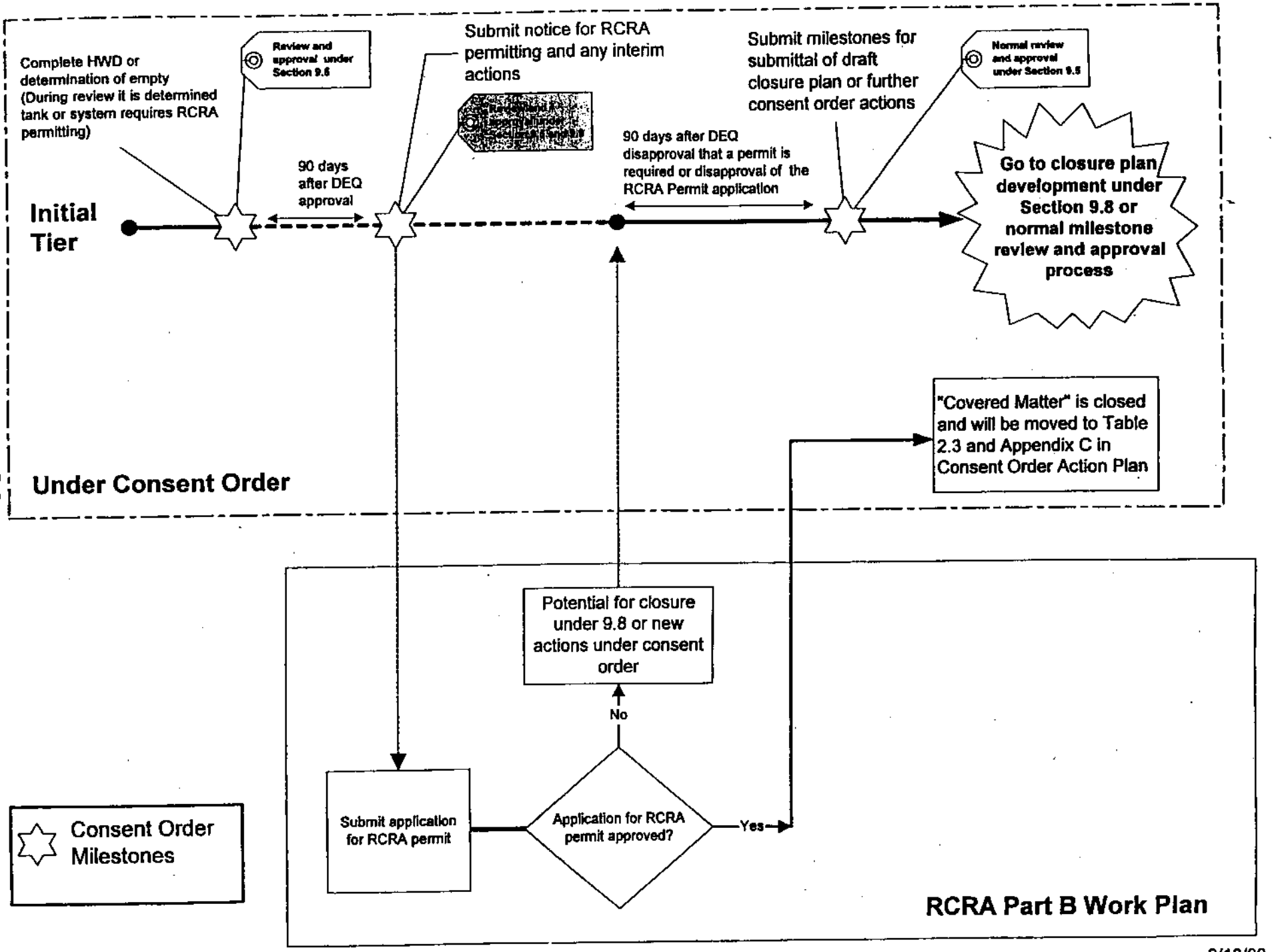
Examples of Permitting, Closure, and New Site Identification Form Review and Approval Under the VCO

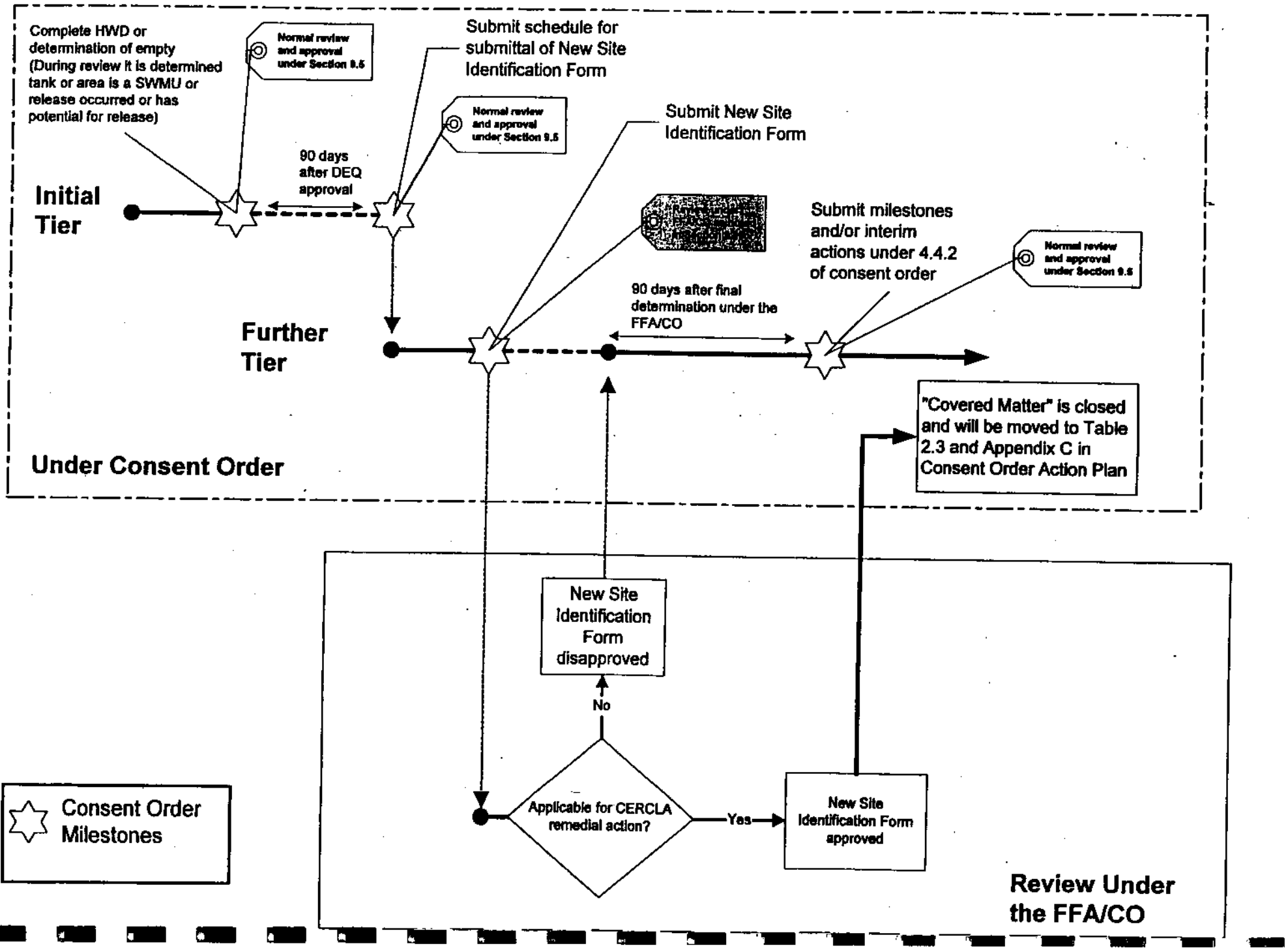
Example of Closure Plan Development and Implementation



9/28/98

Example of Consent Order and RCRA Permit Interface



9/18/98

Example of New Site Identification Form Submittal