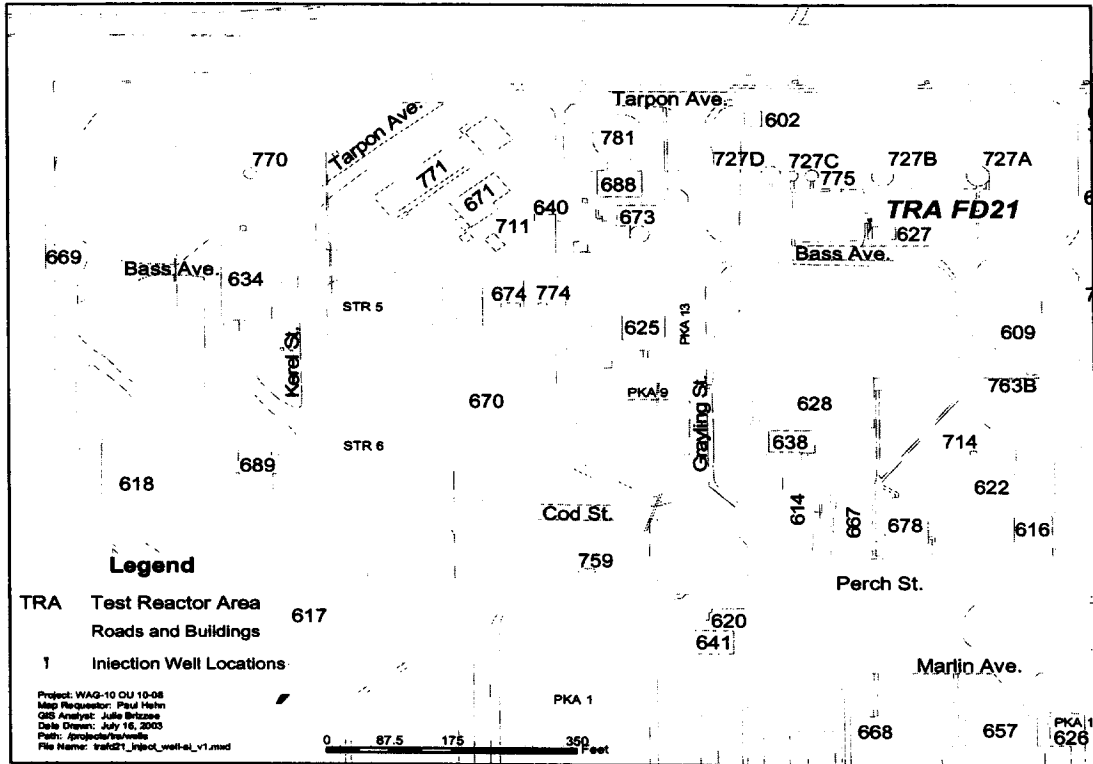


**FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFACO)
NEW SITE IDENTIFICATION (NSI)**

Part A – NEW SITE IDENTIFICATION INFORMATION (To be completed by the Task Lead for New Site)	
1. Site Title: Shallow Injection Well 21-TRA IDWR#29 TRA FD21 Northwest Corner TRA-627 (Use known common names, location descriptors and or processes near or associated with the suspected inactive waste site.)	Site Code: TRA-72 NSI Evaluation Initiation Date: July 18, 2003
2. Task Lead For New Site: Wendell Jolley	Phone: 526-5990
3. NSI Coordinator: Nielsen Burch	Phone: 526-5676
4. Initiator or Initial Observer: Paul V. Hehn	Phone: 526-8886
<p>5. Description of Suspected New Site and Location: (A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors may be included. Document all <u>existing</u> information including historical, process, screening data, analytical data, radiological surveys etc. Attach supporting documentation)</p> <p>This new site identification (NSI) form is for a shallow injection well at the Test Reactor Area (TRA). This well was identified in a correspondence dated 1/3/03 to Mike Piechowski at the Idaho Department of Water Resources (IDWR) from Ron Guymon, Director, BBWI Environmental Affairs. This correspondence also indicates that new site identification forms will be submitted, and provides information concerning the function/description of the wells. For the purposes of this NSI form, the shallow injection well is identified at the top by the Site Title which includes: shallow injection well, the record number and facility identifier, the IDWR Record Number, the well name, and location.</p> <p>This well, located on the northwest corner of building TRA-627, is a buried 55-gallon drum, that received steam condensate from the TRA/MTR steam generation system. The steam condensate line is still in place. It was declared permanently inactive in 1991.</p> <p>The TRA/MTR steam generation system provided high-pressure steam to various TRA facilities. The Steam Plant, located in TRA-609, was originally commissioned as part of the MTR support facilities in 1950. The TRA/MTR Steam Generation System has been removed from service and is no longer in use (EDF-1983 Voluntary Consent Order Tank System TRA-017 -- TRA/MTR Steam Generation System Characterization). Tanks and some piping within this system were assessed under the Voluntary Consent Order (VCO) in 2002. The TRA/MTR steam generation system components evaluated under the VCO program includes #2 boiler (98TRA00421), #1 east boiler (98TRA00422), #3 west boiler (98TRA00423), deaerator tank (98TRA00424), phosphate tank (98TRA00425), sulfite tank (98TRA00428), and two fuel oil tanks (98TRA00462 and 98TRA00463). The results of this assessment determined that boilers #1, #2, and #3, deaerator tank, phosphate tank, and the sulfite tank are empty, and the associated piping and ancillary equipment within the system are empty. The two fuel oil tanks, and associated piping were determined to be nonhazardous and have a low potential for release. All these tanks and piping were determined to be nonhazardous and were moved to Appendix C of the VCO Action Plan – Covered Matters that are Closed (Letter and Appendix C of VCO).</p> <p>The steam, condensate piping, and associated injection wells were not included in the VCO assessment (INEEL 2001 Voluntary Consent Order SITE-TANK-005 System Identification, TRA/MTR Steam Generation System (TRA-017), INEEL/EXT-2000-00037, Book 1-TRA, Volume I, Revision 1, September 2001). It was assumed that this part of the system was nonhazardous as well, and the condensate system was not evaluated further. Therefore all the shallow injection wells associated with this system would meet the Class V definition (EPA Proposes to Continue with its Existing Approach for Managing Class V Injection Wells, EPA 816-F-01-009, April 2001).</p> <p>Chemicals that could potentially be present in the condensate system and the wells include sodium bisulfite, and disodium and trisodium phosphate. At the time the system was constructed, no chemical conditioning agents were used. Beginning in 1986, sulfite and phosphate chemical addition tanks were used to provide chemical conditioning for the boiler feedwater. From the sulfite tank, sulfite salts, primarily sodium bisulfite, were added in batches and diluted with demineralized water. The sulfite solution was pumped to the deaerator. Sulfite was used as a boiler feedwater conditioner because of its ability to scavenge oxygen. (INEEL 2001). The phosphate tank was used to add phosphate to the boiler steam drums to act as a corrosion inhibitor. The phosphate salts, primarily disodium and trisodium phosphate, were added in batches and mixed with demineralized water. The chemical solution was then transferred directly to the boiler steam drums.</p>	

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFA/CO) NEW SITE IDENTIFICATION (NSI)



FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFA/CO)
NEW SITE IDENTIFICATION (NSI)

PART B - FFA/CO RESPONSIBLE PROGRAM MANAGERS (RPM'S) CONCURRENCE

Site Title: Shallow Injection Well 21-TRA IDWR#29 TRA FD21 Northwest Corner TRA-627	Site Code: TRA-72
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DOE-ID FFA/CO RPM Concurrence: Concur with recommendation. Do not concur with the recommendation.

Signature: *[Signature]* Date: 4/11/2006
Explanation:

It is very unlikely that any hazardous constituents that would result in an unacceptable risk to human health or the environment were released to this shallow dry well via the steam generation system. Therefore, I agree this site should be added to OI 10-08 as a "No Action" site.

EPA FFA/CO RPM Concurrence: Concur with recommendation. Do not concur with the recommendation.

Signature: *[Signature]* Date: 5/4/06
Explanation:

Based on the information provided in the section titled, Description of Suspected New Sites and Locations, it appears unlikely that hazardous constituents were released to the environment via the steam generation system.

I concur that this site is a No Action Site.

State of Idaho FFA/CO RPM Concurrence: Concur with recommendation. Do not concur with the recommendation.

Signature: *[Signature]* Date: 10/17/06
Explanation:

This shallow injection well was associated with demineralized water, steam, and sulfite and phosphate salts. The latter (salts) are both considered nonhazardous and nontoxic, and the former were associated with the TRA/MTR steam generation system which was not associated with any hazardous wastes. Based on the information provided, the IDEQ agrees this site is a "No Action" site.