



State of Idaho

DEPARTMENT OF WATER RESOURCES

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Handwritten signature

C. L. "BUTCH" OTTER
Governor

RECEIVED GARY SPACKMAN
Interim Director

APR 21 2010

April 26, 2010

DEPT. OF ENVIRONMENTAL QUALITY
WASTE PROGRAM

Mr. John C. Fulton, President and CEO
Idaho Cleanup Project
2525 North Fremont Avenue
Idaho Falls, Idaho 83415

Re: Request for Use of Injection Well TAN-49 for Injecting Treated Water for Ground Water Remediation at the Idaho National Laboratory

Dear Mr. Fulton,

The U.S. Department of Energy's (DOE) request to use well TAN-49 to inject treated ground water at a rate of 50 gallons per minute is approved. This approval is granted to extend the operational time period of the ASTU up to two years after termination of the in-situ bioremediation project at the hot spot. Starting on the date of this approval letter the Idaho Department of Environmental Quality will review the data and performance of the unit every two years to determine whether DOE will be required to submit additional written request for continued use of the unit. A written notice will be forwarded to DOE if it is determined that a new approval document is required from the IDWR UIC Program for continued re-injection of ground water into the aquifer. While the ASTU is in operation, ground water containing the volatile organic compounds (VOCs) PCE, TCE, and 1,2-DCE, at concentrations exceeding MCLs, will be extracted from well TAN-29. These VOCs will be removed from the extracted ground water to concentrations below MCLs using an air stripper treatment unit (ASTU). This treated ground water will then be injected into TAN-49. The extracted ground water will also contain Sr-90 at concentrations above the MCL of 8 pCi/L which will not be removed prior to injection into well TAN-49. The level of Sr-90 in the treated ground water will not be increased by the treatment process.

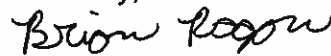
As per the ASTU Operations and Maintenance Plan for Test Area North Operable Unit 1-07B, the un-treated ASTU influent will be sampled for VOCs and the treated effluent to be injected will be sampled for VOCs and Sr-90. To determine if excursion of Sr-90 is occurring due to the injection activities in TAN-49, additional ground water monitoring will be conducted in the down gradient monitoring well TAN-41.

The use of Class IV injection wells to inject hazardous or radioactive wastes into or above an underground source of drinking water is prohibited by Federal and State Code unless they are used as part of a Federally or State approved remediation project as per U.S. Code of Federal Regulations 40 CFR 144.13(c) which states "Wells used to inject contaminated ground water that has been treated and is being reinjected into the same formation from which it was drawn are not prohibited by this section if such injection is approved by EPA, or a State, pursuant to provisions for cleanup of releases under the Comprehensive Environmental

Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. 9601–9657, or pursuant to requirements and provisions under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6901 through 6987.” Pursuant to 40 CFR 144.13(c), the use of TAN-49 in the manner described in the DOE’s request to IDWR is allowable by law.

A permit to inject treated ground water into TAN-49 is not required and is based on information DOE has submitted in accordance with the criteria set forth in the Idaho National Laboratory Federal Facilities Agreement and Consent Order and CERCLA, U.S. Code §42-9621 (e)(1) which states “No Federal, State, or local permit shall be required for the portion of any removal or remedial action conducted entirely on-site, where such remedial action is selected and carried out in compliance with this section.” As such, DOE’s use of the injection well TAN-49 in the manner described in the request is exempt from the procedural requirements of the IDWR UIC Program.

Sincerely,



Brian Ragan, P.G.
UIC Hydrogeologist

cc: file
M. Jeffers, IDEQ
D. Koch, IDEQ