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DEPT. OF WATER RESOURCES



February 18, 2026

IDEQ Director
c/o Mr. Andrew Ramsey - Hazardous Waste Permit Supervisor
Idaho Department of Environmental Quality
1410 N. Hilton, 2nd Floor
Boise, Idaho 83706-1255

Subject: Permit Modification Number 4
2019 RCRA Permit #IDD000602631
PacifiCorp's Idaho Falls Pole Yard

Director,

PacifiCorp is requesting approval of a Class 2 permit modification for our Idaho Falls Pole Yard Facility (IFPY) located at 2200 Leslie Avenue, Idaho Falls, Idaho. We have prepared this permit modification in accordance with the requirements outlined in the Code of Federal Regulations (CFR) 40 section 270.42. Appendix A below includes annotated edits made to the permit pages. A fully revised draft version of the RCRA Permit #IDD000602631 has been uploaded to Microsoft OneDrive and made available to Mr. Daryl Sawyer and Andrew Ramsey of the Idaho Department of Environmental Quality (IDEQ) - Hazardous Waste Permitting Department. Authorization for additional downloads from OneDrive is available upon request. Following a 60-day public comment period, PacifiCorp will 1) respond to all comments received, 2) update the permit, and then 3) repost the proposed final version to One Drive.

Proposed modifications to RCRA Permit #IDD000602631, along with the rationale for each change, are described below:

- Elimination of point of compliance well C-1 from the Corrective Action, Compliance, and Detection Monitoring Programs (CAMP, CMP, and DMP). It is proposed that well R-6 replace C-1 as a point of compliance well for Aquifer 1.

Rationale: As documented in Appendix B, IDEQ preapproved this change on July 2, 2024. Due to draught conditions, PacifiCorp has been unable to purge three well-casing volumes from this well during recent semiannual groundwater sampling events. An

additional rationale for recommending this change is that well R-6 is well positioned to replace C-1 as a point of compliance well for Aquifer 1.

- Permit requirements are now driven by exceedances of chemical specific concentration thresholds rather than laboratory practical quantitation limits (PQLs). Throughout the permit these new chemical specific concentration thresholds are referred to as Idaho Falls Pole Yard Concentration Thresholds (ICTs).

All but two ICTs are set at two orders of magnitude below the Groundwater Protective Standards (GPSs). ICTs for benzo(a)pyrene and dibenzo(a,h)anthracene have been set at the United States Environmental Protection Agency's Maximum Contaminant Level (MCL) or MCL equivalent concentration of 0.2 µg/L.

Rationale: Use of ICTs rather than PQLs to trigger permit requirements allows laboratories to update their PQLs without triggering the need for a permit modification. Also, tying permit conditions to chemical specific GPSs rather than laboratory PQLs allows site requirements to be driven by human health criteria rather than the laboratory's chemical specific reporting limits.

- Upon approval of Modification 4, PacifiCorp will begin sampling upgradient wells MW5 (Aquifer 1) and MW11 (Aquifer 2) and then perform statistical analyses in accordance with Code of Federal Regulations 40 CFR 264.97 and 98. In calendar year 2026 only, MW5 and MW11 will be sampled semiannually. All subsequent years, the two upgradient wells will be sampled annually.

Rationale: This additional sampling and statistical analyses are being performed to allow PacifiCorp to assess whether dissolved polycyclic aromatic hydrocarbons, creosols, and phenols in Aquifers 1 and 2 are migrating onto the Idaho Falls Pole Yard property boundaries from upgradient sources. Sampling wells MW5 and MW11 semiannually in calendar year 2026, is to be performed to supplement historical sampling of the two wells in 1984 and 1985 and allow for Detection Monitoring statistical analyses.

- Elimination of all spring CMP and DMP groundwater monitoring events. Upon IDEQ approval of this Class 2 Permit modification, regularly scheduled RCRA groundwater sampling events will be limited to once per year in the fall. In the future, if groundwater elevations rebound, PacifiCorp may request permission from IDEQ to resume semiannual CMP and/or DMP sampling if it were to allow us to more rapidly close out the RCRA Post Closure Care requirements.

Rationale: As documented in Appendix B, IDEQ preapproved annual groundwater sampling on July 2, 2024. Mr. Paul Hildebrandt of the IDEQ reviewed the historical concentration trends for coal tar creosote constituents in key site wells and has agreed to

approve reducing the CMP and DMP groundwater monitoring requirements to once per year. Refer to Appendix A for further details on the rationale behind switching from semiannual to annual CMP and or DMP sampling.

- Within MOD 4, we are requesting that readiness testing of the IFPY water treatment plant (see RCRA Permit Section IV.C.5) be reduced from semiannually to annually. If this proposed modification is approved, readiness testing will be performed immediately following the fall groundwater sampling event.

Rationale: We believe that annual readiness testing is sufficient to maintain the readiness of the water treatment plant. Also, the spring readiness testing unnecessarily triggers the need to perform NPDES sampling/analyses.

- Due to the large variability in hydrogeologic properties and flow rates within the fractured bedrock aquifers at the site, we propose to eliminate the RCRA Permit Section III.E.2 requirement to calculate the groundwater flow rate.

Rationale: Often the Darcy Flux equation is used to estimate an average groundwater flow rate in aquifers consisting of porous media. This equation, however, is not appropriate for fractured bedrock aquifers. Estimating horizontal groundwater seepage velocity in fractured bedrock aquifers would require the use of a colloidal borescope (or similar) in multiple monitoring wells screened in Aquifers 1 and 2. We recommend that the permit condition III.E.2 be revised such that the “apparent groundwater flow direction” be evaluated annually, but the requirement to calculate flow rate be eliminated.

- As required by RCRA Permit Condition III.J.8, EPA toxicity factors and the Groundwater Protective Standards (GPSs) in RCRA Permit Table 1 have been updated. Within Table 1, we have also modified the Laboratory Practical Quantitation Limits (PQLs) to match Chemtech – Ford’s (CTF’s) Minimum Reporting Limits (MRLs). Table 1 method detection limits (MDLs) have also been revised to match CTF’s most recent MDLs.

Rationale: Every five years, RCRA Permit #IDD000602631 requires that chemical specific reference doses and carcinogenic slope factors be updated. In 2024, we used the latest US EPA toxicity factors to recalculate the RCRA Table 1 Groundwater Protective Standards (GPSs).

In August of 2025, we further revised RCRA Table 1 to insert CTF’s MRLs/PQLs and MDLs. For RCRA compliance purposes, we consider CTF’s MRLs equivalent to Permit #IDD000602631 PQLs.

- We propose to revise Permit Condition III.I. (DMP Data Evaluation) and Table 3 to utilize Risk Indices when determining the DMP requirements rather than relying exclusively on laboratory PQLs.

Rationale: The current requirements in Permit Section III.I. are driven exclusively by exceedances of laboratory PQLs, which are not based on human or ecological risk. As currently written, Section III.I. will lead to excessive sampling, notification, and reporting requirements. Use of Risk Indices along with PQLs, will more appropriately tie the DMP requirements to human health risks.

- In the summer of 2025, new variable frequency drives were installed to regulate groundwater extraction pumps at the IFPY. A new process logic controller (PLC) system was also installed during calendar year 2025. Permit Attachment 2 Chapter 10 (Operations and Maintenance) has been modified to list the manufacturers and suppliers of these VFDs and the new PLC.

Rationale: The historical VFDs and PLC were obsolete and required replacement. Updating Chapter 10 of the permit allows the IFPY Team to keep track of the supplier names, addresses, and phone numbers should these systems need to be serviced in the future.

- Permit Condition I.Y. has been revised to allow Reports, Notifications, and Submissions to be sent in care of the Hazardous Waste Supervisor via electronic mail, to the IDEQ Director. Hard copies are no longer required.

Rationale: This will streamline the submittal process by eliminating the requirement for hard copy deliverables. PacifiCorp appreciates IDEQ offering this option.

- Form 6.6 / 10.5 (Quarterly CMP / DMP Inspection Check List) has been modified to clarify the smoke detection system installed at the IFPY facility, as well as to improve the usability of the Form.

Rationale: Clarification on the smoke detection software and improved wording/organization of the Form were required.

- Table 4.7 / 9.7 / 10.2 (Wellfield Construction Summary) has been updated to show replacement of groundwater submersible pumps in wells D-2 and E-2 on May 21, 2025.

Rationale: Submersible pumps in wells D-2 and E-2 required replacement. The IFPY team uses Table 4.7 / 9.7 / 10.2 to keep track of the specifications of well field pumps, transducers, and other details needed for system operation.

- Other edits to the RCRA Permit included minor revisions to:
 - Figures, Tables, Forms,
 - Changes to page numbers and revision dates in page footers,
 - Other (non-technical) minor edits.

Rationale: These non-technical changes were implemented to improve the readability of the permit as well as to track the pages that were changed in Modification #4.

Within Appendix A, please find marked-up pages showing the proposed changes to the IFPY RCRA Permit. A full PDF of Permit IDD000602631 incorporating the changes described above has been uploaded to Microsoft OneDrive. Authorization to access and download this Draft version of the Permit has been granted to Mr. Daryl Sawyer and Andrey Ramsey of the IDEQ Hazardous Waste Permitting Department. Additional downloads are available upon request.

Appendix B contains letters sent to and received from the IDEQ, seeking and granting preapproval for the key permit modifications described herein. For ease of reference, we have also included Appendix C, which provides a list of the 40 CFR Section 270.42 requirements for Class 2 RCRA Permit Modifications. These requirements include, but are not limited to, publishing in a public newspaper a notice of the intent to modify the permit, allowing for a 60-day public comment period, posting copies of the proposed modifications at a place accessible to the public, and holding a public meeting.

A copy of this cover letter (without the Appendices) will also be sent via certified mail to those listed on the Idaho Falls Pole Yard Notification List.

Sincerely,



Scott Wetzel
IFPY Hazardous Waste Management Facility Manager &
PacifiCorp Environmental Remediation and Reclamation Manager

cc: Daryl Sawyer - Idaho Department of Environmental Quality (electronic mail only)
IFPY Facility Notification List (Cover Letter only – Sent Registered Mail)

Appendices:

Appendix A	Marked-up Pages
Appendix B	Preapproval Request and IDEQ Approval Letter
Appendix C	40 CFR 270.42 Requirements for Class 2 Permit Modifications