

## WASTE SITE RECLASSIFICATION FORM

**Operable Unit:** 100-KR-2

**Control No.:** 2016-012

**Waste Site Code(s)/Subsite Code(s):**

100-K-130 (181KE and 1605KE Facilities)

**Reclassification Category:** Interim  Final

**Reclassification Status:** Closed Out  No Action  Rejected   
RCRA Postclosure  Consolidated  None

**Approvals Needed:** DOE  Ecology  EPA

**Description of current waste site condition:**

(What is the current physical state of the site? What activities have been performed?)

The site has been subjected to a removal action (demolition of 181KE and 1605KE facilities).

See attachment.

**Basis for reclassification:**

(How does the site meet the reclassification status?)

At the completion of the both the removal action evidence suggests that all facility debris (including transite debris) had been removed from the site. Interviews with project personnel (AHERA qualified) and photographic evidence support this position.

A Removal Action Report was completed and signed by project and DOE-RL personnel confirming the the requirements of the Removal Action Work Plan were met.

A recent walkdown by Environmental Compliance Quality Assurance confirms the visual absence of transite debris on the site in its current configuration.

See attachment.

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100-K-130 (181KE and 1605KE Facilities)

Project Manager comments:

NA

Waste Site Controls:

Engineered Controls:  Yes  No Institutional Controls:  Yes  No O&M Requirements:  Yes  No

If any of the Waste Site Controls are checked Yes, specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents:

M. S. French

DOE Federal Project Director (printed)



Signature

10/12/16  
Date

NA

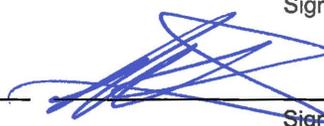
Ecology Project Manager (printed)

Signature

Date

R. A. Lobos

EPA Project Manager (printed)



Signature

10/12/16  
Date

100-K-130  
INFORMATION SHEET

October 12, 2016

Recommendation:

Reclassify the 100-K-130 waste site as "Final-Rejected" in WIDS.

Background:

The 181KE pump house footprint includes the 1605KE guard tower. The 181KE and 1605KE were demolished between June 2011 and September 2011. The facilities contained regulated asbestos-containing material (RACM) which was fully abated during hazardous material removal actions prior to demolition. The 1605KE guard tower was surfaced with cement asbestos board paneling (hereafter referred to as transite) which was removed during demolition as allowed by approved CERCLA documentation, DOE/RL-2005-26, Revision 1, "Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities". Demolition materials were disposed at ERDF.

Extreme care was taken during demolition to prevent materials from entering the Columbia River. This caused higher than usual attention to be paid to all demolition debris, including transite paneling.

The area comprising the footprint of the 181KE facility was backfilled with a clean borrow material then topped with a minimum of 3 feet of imported riprap.

In response to Hanford employee, and US Environmental Protection Agency Region 10, concerns that residual transite debris was present at *some* post-demolition sites, a commitment was made to enter into WIDS, all sites where demolition occurred with transite left in place. These sites were entered into WIDS, whether or not there was physical evidence to support the presence of post-demolition transite debris. The intent was to assure that the sites would be considered in the development of remedial action documentation, and if transite debris was determined to be present, it would be properly considered in the development of remediation goals for the operable unit in which the demolition site was located. Conversely, if it was determined that there was no evidence of the presence of transite debris, the site could be reclassified as "final-rejected". Consistent with this approach, in October, 2012, a new WIDS site was established on the footprint of the previous 181K and 1605KE facility. (No specific inspection at the time the WIDS site was established had confirmed the presence of transite debris at this location.)

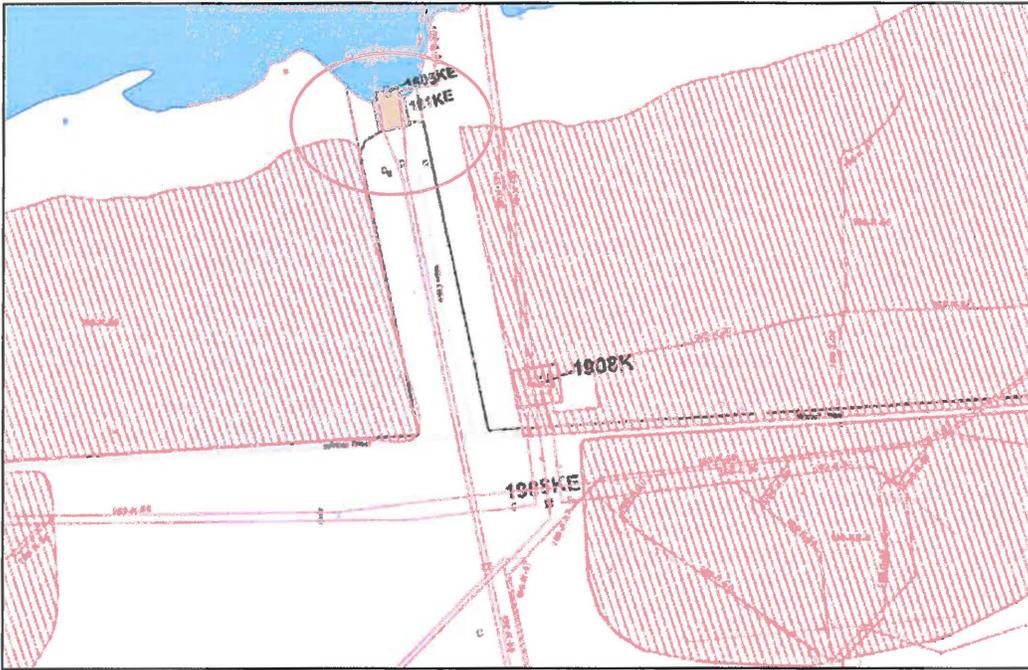
Justification for reclassification as "Final-Rejected":

1. Extreme care was taken during demolition of 181KE and 1605KE to ensure all demolition material, including transite was controlled and could not enter the Columbia River to prevent damage to the sensitive ecosystem. The D&D technique used for this demolition was different than that of other facilities. The control of demolition materials and supervisory oversight was increased during this demolition. The added controls resulted in the transite faced guard shack (16505KE) being removed more carefully than other building in 100-K Area with transite.
2. Transite debris was not present in the post-demolition ground surface, or in borrow material (soils and riprap) used to recontour the shoreline, as confirmed by project personnel (qualified as AHERA inspectors/supervisors).
3. Visual inspection of the surface exposed following demolition is not practical because the Columbia River shoreline enhanced with a minimum of three feet of certified riprap material.

100-K-130  
INFORMATION SHEET

October 12, 2016

Location of 191KE and 1605KE Facilities



Pre-demolition Photo of 181KE and 1605KE Facilities



100-K-130  
INFORMATION SHEET

October 12, 2016

Photograph Prior to Demolition Showing River Protection



Post-Backfill Photograph, Riprap Not Yet Installed



100-K-130  
INFORMATION SHEET

October 12, 2016

Post-Demolition Photograph from Surface, Riprap Installed



Post-Demolition Photograph, Riprap Installed



100-K-130  
INFORMATION SHEET

October 12, 2016

Post-Demolition Photograph, Riprap Installed (Facility Overlay Provided)



References:

- WIDS General Summary Report for 100-K-130.
- Photographs (prior to, during, and after demolition).
- DOE/RL-2005-26, Revision 1, "Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities".
- DOE/RL-2011-84, "Removal Action Report for the 181-KE and 181-KW River Pump Houses and 1605-KE and 1605-KW Guard Towers, 100-K Area".
- Interviews with the CHPRC D&D Director and Project Manager, Earl Prichard.
- Process knowledge from the CHPRC Remedial Action Director and Project Manager, Randy Havenor.