WASTE SITE RECLASSIFICATION FORM

Operable Unit: 100-KR-2 **Control No.:** 2016-010

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

100-K-121 (115KE Facility)

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 the 115KE facility) and a interim remedial action to remove contaminated geologic media.

The buiding was demolished and removed, a significant amount of soil was removed to a considerable depth to address chemical/radionuclide contaminants, and clean backfill placed to partially fill the excavation.

See attachment.

Basis for reclassification:

(How does the site meet the reclassification status?)

At the completion of the both the removal action and remedial 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.

WASTE SITE RECLASSIFICATION FORM

Operable Unit: 100-KR-2 **Control No.:** 2016-010

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

100-K-121 (115KE Facility)

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	M S French	10/12/16
DOE Federal Project Director (printed)	Signature	Date
NA		
Ecology Project Manager (printed)	Signature	Date
R. A. Lobos		10/12/16
EPA Project Manager (printed)	Signature	Date

100-K-121
INFORMATION SHEET

July 11, 2016

Recommendation:

Reclassify the 100-K-121 waste site as "Final-Rejected" in WIDS.

Background:

The 115KE facility was demolished in March, 2011. The facility contained regulated asbestos-containing material that was fully abated during hazardous material removal actions prior to building demolition. The eastern-most top floor of the facility surfaced with cement asbestos board paneling (hereafter referred to as transite) 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". The Deactivation, Decommissioning, Decontamination, and Demolition (D4) organization removed all materials from the ground surface up and internal to the basement exterior walls and foundation during demolition using the basement as the staging area for this work. Demolition materials were disposed at ERDF.

The Remedial Action Project completed removal of the 115KE facility basement by continuing demolition and direct load of containers for disposal (no staging or stockpile area during demolition). The facility was fully removed and the excavation was advanced to approximately 1.2 meters below the basement structure according to civil surveys. No demolition debris remained in the excavation.

Soil sample results indicated (and were expected to indicate) elevated carbon-14 and tritium above cleanup standards in the vicinity of the 116-KE-1 waste site. As a result, the remediated footprint for the 116-KE-1 waste site, originally associated with the 115KE condensate crib, was expanded to include the footprint of the 115KE facility. Final action on the 116-KE-1 waste site is deferred to be handled under the final ROD.

The area comprising the footprint of the 115KE facility was backfilled with approximately 10 feet of clean borrow material from an approved borrow source.

Summary Table of Elevations (approximate):

Component	Elevation (feet)	Delta From Original Grade (feet)	Source
Grade (pre-excavation)	467.5	0	Civil Survey in DOE/RL-2012-38
Lowest point of facility	455.0	-12.5	H-1-23341KE as built
Excavation bottom	451.1	-16.4	Civil Survey in DOE/RL-2012-38
Backfill	462.5	-5	Walk down with pre-excavation topo and handheld GPS

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 115KE 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. Following demolition of the facility, remedial action processes were implemented, resulting in a substantial excavation of soil. Facility debris was not present in the post-excavation surface, or borrow material used as backfill, as confirmed by project personnel (qualified as AHERA inspectors/supervisors).

- Post-removal action/remedial action walk downs were conducted by AHERA qualified personnel, and a Removal Action Report, DOE/RL-2011-20, "Removal Action Report for the 115-KE, 116-KE, 117-KE, Ancillary Facilities, 100-K Area", attesting to the completion of the work in accordance with applicable CERCLA documents, was signed by qualified personnel.

2. Visual re-inspection of the final excavation surface is not practical because the facility has been fully removed, the excavation advanced to approximately five feet below the basement structure, and backfill performed with approximately 5 feet of clean borrow material from an approved borrow source. A visual inspection of the current surface confirms the visual absence of transite at the site in its current configuration (report attached).

Location of 115KE

July 11, 2016

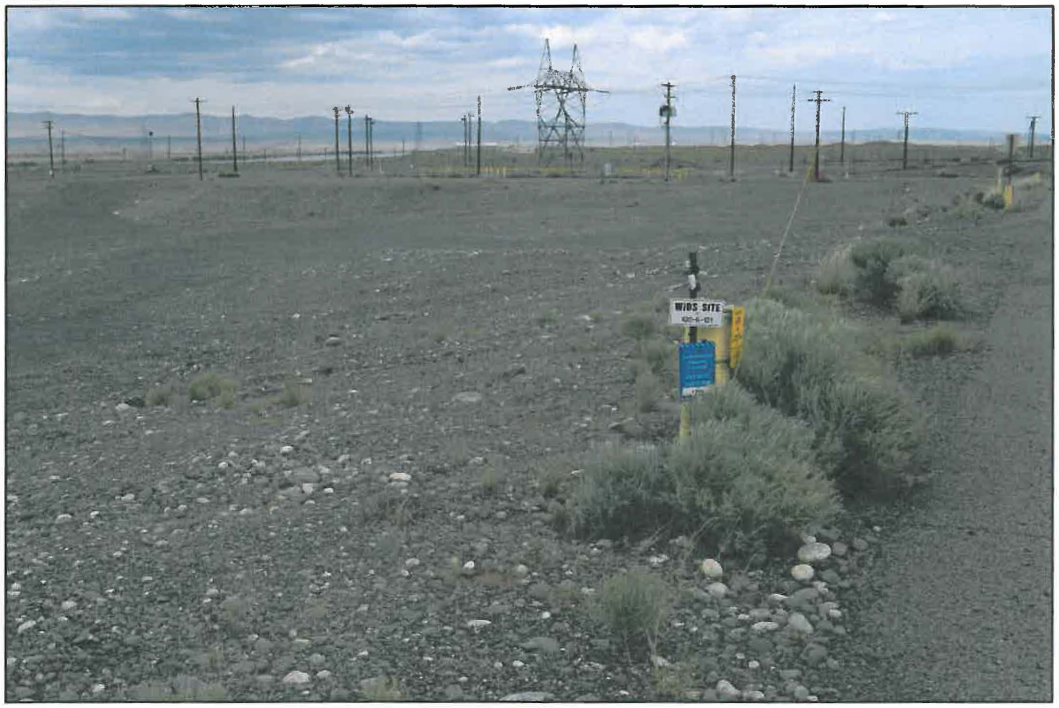
Remedial action work in progress at 115KE.

Nearing post-remediation excavation photo of 115KE.

July 11, 2016

Aerial photo post-remediation excavation

Post-backfill photo



July 11, 2016

References:

- WIDS General Summary Report for 100-K-121.
- WIDS General Summary Report for 116-KE-1.
- H-1-23341KE, Structural Concrete Foundation Plan as built drawing.
- Photographs (prior to, during, and after excavation).
- DOE/RL-2005-26, Revision 1, "Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities".
- DOE/RL-2011-20, "Removal Action Report for the 115-KE, 116-KE, 117-KE, Ancillary Facilities, 100-K Area".
- DOE/RL-2012-38, Remaining Sites Verification Package for the 100-KR-2 Operable Unit Waste Sites: 100-K-6, 100-K-46, 100-K-62, and 132-KE-1.
- 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.