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WASTE SITE RECLASSIFICATION FORM

Operable Unit: 100-DR-1 **Control No.:** 2015-005
Waste Site Code(s)/Subsite Code(s): 100-D-31:12

Reclassification Category: Interim ☒ Final ☐
Reclassification Status: Closed Out ☒ No Action ☐ Rejected ☐
RCRA Post-closure ☐ Consolidated ☐ None ☐
Approvals Needed: DOE ☒ Ecology ☒ EPA ☐

Description of current waste site condition:

The 100-D-31, 100-D Water Treatment Facilities Underground Pipelines transported treated cooling water, septic sewer wastes, and process sewer wastes. The entire waste site was designated for remediation in the *Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units, Hanford Site, Benton County, Washington*, U.S. Environmental Protection Agency, Region 10, Seattle, Washington (Remaining Sites ROD) (EPA 1999). Subsequently, the 100-D-31 waste site was divided into 12 subsites and an additional two "pipeline stubs" sites that were created when the remediation of 100-D-31 process sewers and septic sewers encroached upon the 182-D Reservoir and the 183-D Basins and threatened to destabilize those facilities while they were still in use.

This reclassification form specifically addresses the 100-D-31:12, 183-D West Process Sewer Pipelines subsite. The 100-D-31:12 subsite consisted of process sewer pipelines associated with the 183-D facility. The 100-D-31:12 pipelines did not transport cooling water that could have contained hexavalent chromium.

Prior to and during remediation, overburden was removed and stored to the east of what became the main excavation in the area of the 183-D Clearwells.

Remediation of the 100-D-31:12 waste site was conducted concurrently with the 100-D-72 and 100-D-31:11 waste sites. Excavation of these waste sites began on December 3, 2013, and was completed on February 26, 2014. Approximately 10,585 bank cubic meters (13,845 bank cubic yards) of soil, piping debris, steel, concrete, and vitrified clay pipe were disposed to the Environmental Restoration Disposal Facility (ERDF). The depth of the resulting excavation varied from 2.7 m (8.9 ft) to approximately 5.7 m (18.7 ft) below ground surface. There were no observed anomalies.

Within the main excavation, pipes belonging to the 100-D-108, 182-D Remaining Pipeline Stubs waste site were exposed.

During remediation, a staging pile area (SPA) was used prior to final disposal of materials to ERDF. The SPA area lies to the southwest of the main excavation.

Two areas of the excavation were backfilled prior to completion of the remediation:

- The south end of the main excavation extended beyond Paddock St., approximately 30 m (98.4 ft), then turned 90 degrees to the east and extended to the edge of the 100-D-100 excavation. A small section of this part of the excavation, just south of Paddock St., was backfilled on March 12 and 14, 2014, to provide needed access to a groundwater well in the area. Two samples were collected prior to backfilling.

- Near the northeast corner of the former 183-D Filter Building another smaller excavation was made to remove small sections of pipe that had been assigned to the 100-D-31:11 waste site. Four samples were collected from this smaller excavation prior to backfilling on March 19, 2014. Overburden from the main excavation was used for backfill and is also stored in this area. Backfilling was conducted to support use of the Northern 183-D Clearwell as bat habitat.

Soil samples were collected from the overburden piles; the SPA; the 100-D-72, 100-D-31:11, and 100-D-31:12 excavation; from below the 100-D-108 pipe stubs; and from below the former 100-D-59 french drain between September 9 and September 15, 2014. These samples were collected per the *Work Instruction for Verification Sampling of the 100-D-72, 100-D-31:11, 100-D-31:12, 100-D-108, and 100-D-109 Waste Sites*, 0100D-WI-G0139, Washington Closure Hanford, Richland, Washington (WCH 2014).

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Design Report/Remedial Action Work Plan for the 100 Areas (100 Area RDR/RAWP), DOE/RL-96-17, Rev. 6, U.S. Department of Energy, Richland Operations Office, Richland, Washington (DOE-RL 2009b). The selected action involved: (1) excavating the site to the extent required to meet specified soil cleanup levels, (2) disposing of contaminated excavation materials at ERDF, (3) demonstrating through verification sampling that cleanup goals have been achieved, and (4) proposing the site for reclassification to Interim Closed Out.

Basis for reclassification:

In accordance with this evaluation, the verification sampling results support a reclassification of the 100-D-31:12 waste site to Interim Closed Out. The current site conditions achieve the remedial action objectives and the corresponding remedial action goals established in the Remaining Sites ROD (EPA 1999) and the 100 Area RDR/RAWP (DOE-RL 2009b). The results of verification sampling show that residual contaminant concentrations do not preclude any future uses (as bounded by the rural-residential scenario) and allow for unrestricted use of shallow zone soils (i.e., surface to 4.6 m [15 ft] deep). Contamination above direct exposure remedial action goals was not observed in shallow or deep zone soils. Therefore, institutional controls to prevent uncontrolled drilling or excavation into the deep vadose zone of the site are not required. The basis for reclassification is described in detail in the *Remaining Sites Verification Package for the 100-D-72, 183-D Acid Facility; 100-D-31:11, 182-D and 183-D Sewer Pipelines; 100-D-31:12, 183-D West Process Sewer Pipelines; 100-D-108, 182-D Remaining Pipeline Stubs; and the 100-D-109, 183-D Remaining Pipeline Stubs Waste Sites* (attached).

Regulator comments:

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:

J. P Neath	J P Neath	5/21/15
DOE Federal Project Director (printed)	Signature	Date
N. Menard	Nina M. Menard	5/28/15
Ecology Project Manager (printed)	Signature	Date
N/A		
EPA Project Manager (printed)	Signature	Date