



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 Swift Boulevard, Suite 5
Richland, Washington 99352

0058553

December 5, 2002

Administrative Record
233-S Pu Concentration Facility
Decontamination and Decommissioning (D & D)

RECEIVED
JAN 21 2003

Re: 233-S Pu Concentration Facility D & D Project Endstate

EDMC

Administrative Record:

The 233-S Plutonium Concentration Facility D & D is being conducted as a non-time-critical removal action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). A CERCLA Action Memorandum signed March 24, 1997 ("Removal Action at the 233-S Plutonium Concentration Facility, United States Department of Energy (USDOE) Hanford Site, Benton County, Washington") provides the authority for the removal action. The endstate of the facility described by the Action Memorandum includes decontamination and demolition of the 233-S facility down to 3 feet below grade. This endstate also includes removal of connected structures and contaminated soil 3 feet laterally from the facility. The 233-S facility includes the 233-S building and 233-SA exhaust building. ✓ 47268

The U.S. Environmental Protection Agency (EPA) and the U.S. Department of Energy (DOE) have concluded that the endstate should be modified to slab-on-grade (i.e. above-ground structures removed but the slab and foundation left intact). There are two reasons that the endstate should be changed from the one described in the Action Memorandum. First, leaving the slab intact lowers the risk to workers from subsurface contamination in the interim period between completion of the 233-S D & D project and disposition of the nearby REDOX canyon building and associated soil waste sites. The slab would provide shielding and prevent inadvertent intrusion into subsurface contamination by Hanford personnel.

The second reason for the change in endstate revolves around characterization planning needs. The EPA believes that the slab and subsurface contamination should be addressed as part of an integrated remedial action for the REDOX area. The subsurface can best be characterized under the remedial investigation/feasibility study process for the remedial action rather than under a non-time-critical removal action whose original scope is limited to 3 feet below grade.

The safety and characterization planning considerations mentioned above warrant the change in endstate to slab-on-grade. The two agencies that signed the 233-S Pu Concentration Facility Action Memorandum have agreed to this change.

Craig Cameron
EPA

Harry Bell
DOE

cc: Rick Bond, WA Dept. of Ecology
John Price, WA Dept. of Ecology
Don Engleman, Fluor Hanford