Attachment ES-1

WASTE SITE RECLASSIFICATION FORM						
Operable Unit: 300-FF-2				Control No.: 2017-028		
Waste Site Code(s)/Subsite Code(s): 618-10 Burial Ground						
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 618-10 Burial Ground, part of the 300-FF-2 Operable Unit, is located in the 600 Area of the Hanford Site, approximately 6.4 kilometers (4 miles) northwest of the 300 Area, west of Route 4 South. The approximately 2.3 hectare (5.7 acre) burial ground operated from March 1954 until September 1963 receiving a variety of waste from the 300 Area operations that was disposed in 12 burial trenches and 94 vertical pipe units. The selected remedial action involved (1) excavating the site to the extent required to meet specified soil cleanup levels, (2) disposing of contaminated excavation materials at the Environmental Restoration Disposal Facility in the 200 Area of the Hanford Site, (3) backfilling the site with clean soil, and (4) implementing institutional controls as necessary per EPA and DOE, 2013, *Hanford Site 300 Area Record of Decision for 300-FF-2 and 300-FF-5, and Record of Decision Amendment for 300-FF-1*, U.S. Environmental Protection Agency, Region 10, Seattle, Washington (300 Area Record of Decision).

Excavation operations at the 618-10 Burial Ground and associated waste disposal activities began with remediation of the burial trenches starting in 2011. Contents of the vertical pipe units began to be removed in 2016 after extensive preparations to ensure that their contents remained isolated from the environment. At the completion of field operations in 2017, the area of the excavation was approximately 221,111 m^2 (2,380,019 ft^2) with a maximum depth of approximately 11 m (36 ft) below the surrounding grade. Final remediation resulted in a total of 477,820 metric tonnes (526,700 tons) of material being disposed at the Environmental Restoration Disposal Facility. Excavation and disposal activities have been completed for the 618-10 Burial Ground.

Basis for reclassification:

Remedial action at the 618-10 Burial Ground has been performed in accordance with remedial action objectives and goals established by the U.S. Environmental Protection Agency and the U.S. Department of Energy, Richland Operations Office, in concurrence with the Washington State Department of Ecology. The basis for reclassification is described in detail in DOE/RL-2017-61, *Cleanup Verification Package for the 618-10 Burial Ground*, CH2M HILL Plateau Remediation Company, Richland, Washington. Remediation was performed in accordance with the DOE/RL-2014-13-ADD1, *Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils*, U.S. Department of Energy, Richland Operations Office, Richland, Washington, to meet the cleanup levels specified in the 300 Area Record of Decision (EPA and DOE, 2013). Verification sampling conducted during August through December of 2017 determined that the 618-10 Burial Ground has been remediated to meet the cleanup levels specified in the 300 Area Record of Decision (EPA and DOE, 2013).

Regulator comments:

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Waste Site Code(s)/Subsite Code(s): 618-10 Burial Ground

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:

Residual soil at the 618-10 Burial Ground has been sampled, analyzed, and compared to cleanup levels. Results indicate the site supports future land uses that can be represented (or bounded) by the residential land-use scenario and poses no threat to groundwater or the Columbia River. Consequently, the 618-10 Burial Ground is verified to be remediated in accordance with the 300 Area Record of Decision (EPA and DOE, 2013). Because of residual radionuclide contamination in the deep zone (below 4.6 m [15 ft]) at the site, institutional controls are required to prevent uncontrolled drilling or excavation into the deep zone (i.e., below 4.6 m [15 ft]) and avoid potential exposure to radiological contaminated material. RESidual RADioactivity modeling per ANL, 2016, RESRAD-ONSITE for Windows, Version 7.2, Environmental Science Division, Argonne National Laboratory, Argonne, Illinois, determined that 81 years of radioactive decay is necessary to reduce the radiological risk to meet the limitation of 1×10^{-4} risk stated in the 300 Area Record of Decision (EPA and DOE, 2013).

Mark French	M. J. French	6/13/18
DOE Federal Project Director (printed)	Signature	Date
N/A	N/A	N/A
Ecology Project Manager (printed)	Signature	Date
Ben Simes	[redacted]	6/18/18
EPA Project Manager (printed)	Signature	Date