



U.S. Department of Energy Hanford Site

21-PFD-000842

March 17, 2021

Mr. Craig E. Cameron, Project Manager
Superfund and Emergency Management Division
Site Cleanup Section 4
U.S. Environmental Protection Agency
825 Jadwin Avenue, Suite 210
Richland, Washington 99352

Dear Mr. Cameron:

REQUEST FOR APPROVAL TO USE THE PLUG-IN APPROACH FOR DISPOSAL OF MISCELLANEOUS SURVEILLANCE AND MAINTENANCE WASTE IN THE ENVIRONMENTAL RESTORATION DISPOSAL FACILITY

The U.S. Department of Energy, Richland Operations Office (RL) requests the U.S. Environmental Protection Agency (EPA) to approve the disposal of Hanford-only-generated wastes from Surveillance & Maintenance (S&M) collection at the Environmental Restoration and Disposal Facility (ERDF). In May 2007, the ERDF Record of Decision (ROD) was amended to facilitate disposal of wastes generated in support of Hanford's cleanup mission. The modified remedy sought disposal as a more economical and environmentally protective option compared to storage for wastes that are similar to wastes being disposed at ERDF. Several Hanford-only-generated wastes in storage were identified as eligible for ERDF disposal under the 2007 ROD Amendment.

RL has identified additional candidate wastes that will originate at Hanford and are similar in characteristics and description to wastes identified in Table 1 of the 2007 ROD, and therefore requests EPA approval for disposal of these wastes into ERDF. RL is prepared to follow the same ERDF disposal implementation and acceptance process as is used for wastes in Table 1. RL also recognizes that the generation, treatment, and other management of such waste prior to and during storage would be governed by otherwise applicable requirements. The wastes will be generated by routine S&M activities performed in support of Hanford cleanup, including the following materials:

- Absorbed liquids (e.g., water)
- Soils
- Powders
- Oils/grease
- Paint chips
- Commercial chemical products

The subject wastes would exhibit the potential to be contaminated with radionuclides and would be stored before disposal.

These wastes will meet the following criteria, stipulated in the amended ROD for the ERDF issued in 2007, for disposal in the ERDF under the plug-in approach:

- Be similar to the wastes identified in Table 1 of the 2007 ROD Amendment
- Meet existing ERDF Waste Acceptance Criteria (WAC), or be capable of meeting the WAC with treatment
- Comply with land disposal restriction requirements
- Be generated at Hanford or derived directly from Hanford generated waste in support of Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanup actions
- Be compatible for disposal at the ERDF
- Not addressed by an existing CERCLA decision document

In accordance with the established plug-in process, the ERDF ROD Amendment will serve as the decision document for these Hanford generated wastes. Disposal at ERDF will meet the following:

- Evaluation of the wastes will be performed prior to or during storage to ensure that the wastes will be compatible for disposal at ERDF;
- Evaluation of the wastes will be performed to ensure that the wastes will meet the ERDF waste acceptance criteria;
- Treatment will be performed as appropriate to meet land disposal restriction standards and other requirements;

Approval from EPA is requested to authorize this waste for disposal at the ERDF under the plug-in approach. RL is prepared to provide any additional information that EPA deems necessary as part of the waste acceptance process. Waste treatment, if needed, would be performed at the onsite generating location, or at an approved facility, in accordance with the applicable regulatory framework and requirements (e.g., RCRA, *Atomic Energy Act of 1954*, etc.).

When appropriate, such treatment would be performed at ERDF (stabilization and/or encapsulation) in accordance with the ERDF ROD, as amended, under a treatment plan approved by the EPA.

If you have any questions, please contact me or your staff may contact Al Farabee, of my staff, on (509) 376-8089.

Sincerely,

**William F.
Hamel**

Digitally signed by William F. Hamel

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William Hamel, Assistant Manager
for the River and Plateau
Richland Operations Office

PFD:MBG

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