



U.S. Department of Energy
Hanford Site

20-AMRP-0006

FEB 18 2020

Ms. Emerald Laija, Program Manager
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
MC 5106R
Washington, District of Columbia 20460

Dear Ms. Laija:

INTERIM STABILIZATION OF WASTE SITES 216-Z-2 CRIB, 216-Z-9 TRENCH, AND
241-Z-361 SETTLING TANK

- References:
1. CHPRC letter from L. T. Blackford to J. C. Connerly, RL, "Structural Evaluation of Select Aging Structures," CHPRC-1904309, dated October 23, 2019.
 2. Record of Decision, Hanford 200 Area, Superfund Site, 200-CW-5 and 200-PW-1, 200-PW-3, and 200-PW-6 Operable Units, September 2011.

The U.S. Department of Energy, Hanford Site (DOE) has conducted a comprehensive structural evaluation of a number of aging structures following the partial collapse of Plutonium Uranium Extraction Facility Tunnel 1, and the subsequent structural evaluation of Tunnel 2. The results of the evaluation and recent subsidence at 216-Z-1 indicate a number of structures are overstressed and at risk of age-related failure, which could result in a release of contamination with impacts to human health and the environment. Three of the identified structures are 216-Z-2 Crib, 216-Z-9 Trench and 241-Z-361 Settling Tank.

DOE plans to access the structures for investigation during May 2020, and to start grout injection in July 2020. The proposed method for abatement and stabilization will be to place engineered grout in the void space of all three structures. DOE has provided the U.S. Environmental Protection Agency (EPA) with the structural evaluation, Reference (1) and the Expression of Interest and Request for Proposal related to procuring services for grout placement. The current schedule for future events is given below:

- Award contract for grout placement in March;
- Perform mockup testing of grout deployment equipment in April/May;
- Perform video inspection in May; and
- Insert grout in July.

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Consistent with DOE's previous statements in discussions with EPA on this effort, DOE concludes a time-critical removal action (TCRA) for stabilization is appropriate. For this TCRA, a planning period of less than six months exists. DOE proposes DOE and EPA issue a joint TCRA Action Memorandum explaining the need for the action and authorizing the stabilization. DOE is in the process of preparing that memorandum. DOE needs to award its stabilization contract by March 2020. DOE would appreciate EPA continuing to coordinate closely with DOE, with the goal of issuing the joint memorandum by March 30, 2020. Given the need for stabilization, DOE may find it necessary to proceed under DOE authority if it does not receive EPA's approval by March 30, 2020.

This stabilization is not intended, or expected by DOE, to impact overall completion (schedule or budget) of 200-PW-1/3/6, 200-CW-5 scope. DOE remains committed to the implementation of the ROD scope in accordance with Tri-Party Agreement milestones and understands that EPA is not agreeing to any delays in the enforceable schedule in the associated Remedial Design/Remedial Action Work Plan for remedy implementation.

DOE anticipates beginning a 30-day Public Comment Period by March 25, 2020. A Comment Response document would be posted to the Administrative Record within 90 days of the closure of the Public Comment Period. With EPA's support, we look forward to completing the stabilization in a safe and timely manner.

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

Sincerely,



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

AMRP:OAF

cc: See page 3

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cc: S. G. Austin, CHPRC
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L. T. Blackford, CHPRC
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S. N. Schleif, Ecology
A. K. Smith, Ecology
Administrative Record (216-Z-2 Crib,
216-Z-9 Trench, 241-Z-361 Settling Tank)
Environmental Portal