

**HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
INTERAGENCY MANAGEMENT INTEGRATION TEAM (IAMIT)
DETERMINATION Number: 2020-006**

This form is intended to document the decisions and determinations made by the IAMIT within their authorities under the terms and conditions of the Hanford Federal Facility Agreement and Consent Order. This form is also intended to provide notification, to the affected persons, of the IAMITs decisions / determinations or actions assigned.

SUBJECT Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau

DETERMINATION:

The U.S. Department of Energy (DOE), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA) formed the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Team in September 2019, to define an expedited process, focused on 200-EA-1, 200-WA-1, and 200-BC-1 Operable Units (OUs), addressing the following objectives:

- Implement early remedial actions,
- Accelerate cleanup decisions,
- Ensure consistent remedies for similar waste sites,
- Reduce characterization pre-Record of Decision (ROD), and
- Conduct focused confirmatory characterization post-ROD.

The RASCAL Team developed an expedited process for the representative and analogous waste sites approach presented in Attachment 1, Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions and provides the following actionable recommendations:

- Create 200-IA-1 OU, a new Inner Area OU co-regulated by EPA and Ecology.
 - Assign the selected waste sites from 200-EA-1 and 200-WA-1 OUs to this new OU that currently have sufficient information to determine one of the following final end states: Remove, Treat and Dispose (RTD) or confirmatory sampling/no further action (CS/NFA)
 - Implement cleanup by geographic area to maximize flexible and efficient work mobilization
 - Initiate 200-IA-1 OU Focused Feasibility Study (FFS) development immediately following IAMIT agreement.
- Update the work plans for 200-EA-1 OU and 200-WA-1/200-BC-1 OUs.
 - Implement approach presented in Attachment 1 consistently across 200-EA-1 and 200-WA-1 OUs.
- Initiate 200-BC-1 OU accelerated Focused Feasibility Study.

(continued on page 2)

IS THIS DETERMINATION

FINAL INTERIM (Further action to be taken)

IAMIT MEMBER APPROVALS

W.F. Hamel, DOE-RL

Date

R.G. Hastings, DOE-ORP

Date

D.R. Einan, EPA

Date

A.K. Smith, Ecology

Date

**IAMIT Determination 2020-006, RASCAL Recommendations for Expediting
Remedial Cleanup on the Hanford Central Plateau**

DETERMINATION (continued):

Implementing these recommendations has the following benefits:

- Reduce pre-ROD characterization penetrations by as much as 75% using the representative and analogous waste site approach,
- Accelerate cleanup decisions for approximately 80 waste sites via the new 200-IA-1OU to reach a ROD an estimated 3-3.5 years earlier than the current assumed ROD timeline for the 200-EA-1 and 200-WA-1 OUs, and
- Accelerate cleanup decisions by implementing 200-BC-1 OU FFS on its 27 co-located waste sites leading to its own ROD.

The IAMIT members agree with the RASCAL Team's recommendations and request that they proceed.

Attachment 1:

**Representative and Analogous Waste Site Approach to
Accelerate Central Plateau Inner Area Cleanup Decisions**

**IAMIT Determination 2020-006, RASCAL Recommendations for Expediting
Remedial Cleanup on the Hanford Central Plateau**

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Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

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Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

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Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

1 Overview

The process described herein and depicted in Figure 1 has been developed by the RASCAL team¹ to support a 2020 IAMIT agreement to proceed with implementation. The process achieves the following objectives:

- Implement early remedial actions
- Accelerate cleanup decisions
- Ensure consistent remedies for similar waste sites
- Reduce characterization pre-Record of Decision (ROD)
- Conduct focused confirmatory characterization post-ROD

The RASCAL team considered the Central Plateau Inner Area Operable Units (OUs) and associated waste sites and reached agreement to focus these efforts on the 200-EA-1, 200-WA-1, and 200-BC-1 OUs and their approximate 300 waste sites². The team evaluated these waste sites relative to the objectives defined above and recommends three actions:

- Create 200-IA-1 OU, a new Inner Area OU co-regulated by EPA and Ecology
- Update the work plans for the 200-EA-1 OU and 200-WA-1/200-BC-1 OUs
- Initiate 200-BC-1 OU accelerated Focused Feasibility Study

The purpose herein is to describe these actions sufficiently to guide future implementation.

¹ Representative-Analogous Site Coordinating Agency Liaisons (RASCAL) are Doug Hildebrand (DOE), Kim Welsch (Ecology), Nina Menard (Ecology), and Craig Cameron (EPA). The RASCAL team is supported by additional Tri-Party representatives and contractor staff.

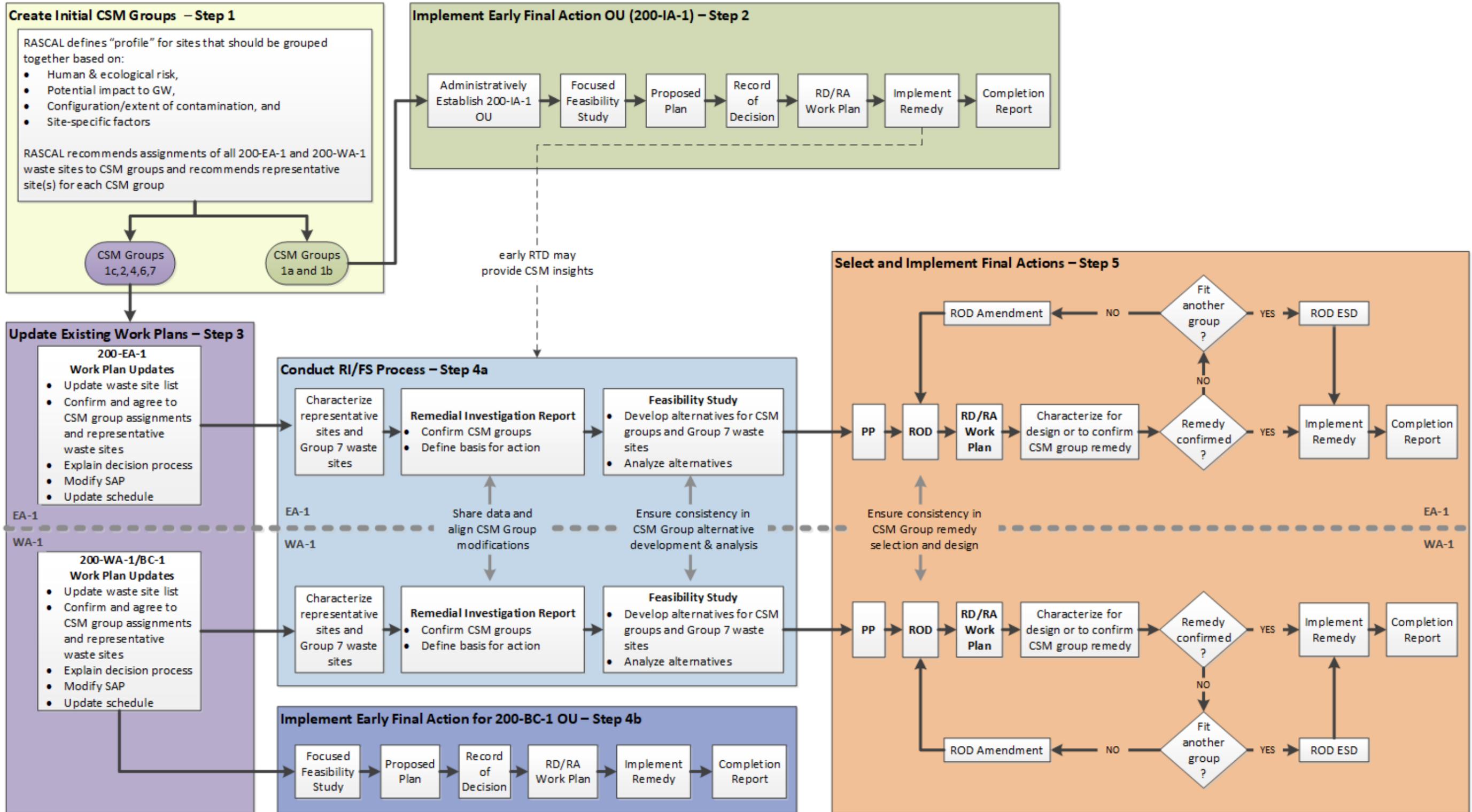
² 12 source OUs and their respective 946 waste sites were considered. While the process has been developed for specific operable units, the concepts may be applicable to additional Inner Area operable units.

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

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Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

Figure 1. Process Flow Diagram



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Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

2 Representative and Analogous Waste Site Approach

The representative and analogous waste site approach premise is waste sites with analogous conceptual site models (CSM) are likely to have similar response actions. Characterization information from a “representative” waste site is applied across analogous waste sites to support decision-making, resulting in less pre-ROD characterization. The post-ROD characterization is focused on confirming current CSM group assignment or assisting in assignment to another CSM group. The approach is consistent with CERCLA and follows the representative and analogous site concepts defined in *200 Areas Remedial Investigation/Feasibility Study Implementation Plan* (DOE/RL-98-28) and *Supplemental Remedial Investigation/Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units* (DOE/RL-2007-02).

The representative and analogous waste site approach applied by the RASCAL team is detailed below.

2.1 Conceptual Site Model Groups

The past representative and analogous waste site approaches identified above defined a range of conceptual site model groups (DOE/RL-2007-02 and DOE/RL-98-28) that have been carried forward by the RASCAL team. Based on the 200-EA-1, 200-WA-1, and 200-BC-1 waste sites review, the RASCAL team determined some of the original CSM groups are not applicable to these OUs. Additionally, the RASCAL team has proposed sub-groupings based on a refined segregation of waste sites based on depth of contamination which is a primary driver in the range of potential remedial actions. Table 1 lists the CSM groups and sub-groups that were created, the characteristics that describe the group and the number of waste site that are assigned to each group in the three OUs. The complete waste site listing by CSM group is provided in Attachment A.

Table 1. CSM Grouping Overview

CSM Group/ Subgroup	Description *	Waste Site Count		
		200-EA-1	200-WA-1	200-BC-1
1a	Shallow zone only – RTD bias; planned move to new 200-IA-1 OU	25	19	0
1b	Shallow zone only – CS/NFA bias; planned move to new 200-IA-1 OU	13	19	0
1c	Shallow zone only but requires coordination with co-located waste sites	1	0	0
2	Intermediate and deep zone	3	1	0
3	Large area plutonium waste sites (addressed in existing ROD)	Not applicable		
4	Small to medium transuranic cribs	0	3	1
5	Ponds and related waste sites (addressed in other OUs)	Not applicable		
6a	Shallow and Intermediate	10	32	19
6b	Shallow, Intermediate, and deep	27	22	6
7	Unique CSM waste sites (potential future septic systems and pipelines group?)	35	76	1

Notes:

Intermediate = between 15 and 70 feet below ground surface

Deep = greater than 70 feet below ground surface

*Final waste site binning determinations for CSM group 6 and 7 are still being made and the count for all CSM groups may change as a result.

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

2.2 Waste Site Profiles and Binning into Conceptual Site Model Groups

Waste sites are considered “analogous” if they pose similar risks through similar exposure pathways and have a similar configuration of contamination. The RASCAL team defined “Waste Site Profiles” for each CSM Group based on the following factors:

- **Outdoor Worker or Ecological Population Risk:** The presence of threats to outdoor worker and/or ecological populations is assessed for the top 15 ft of the vadose zone and would drive the evaluation of certain types of actions to address these exposure pathways.
- **Threat to GW:** Impacts to groundwater from contaminant migration is assessed for any depth and would drive the evaluation of certain types of actions for this transport pathway.
- **Configuration of Contamination:** The known or expected depth, size, and shape of the contamination based on current site knowledge and future fate and transport.
- **Site-specific Considerations:** There may be specific physical setting considerations indicating an independent site evaluation, rather than group assignment. These considerations include being under an expected canyon barrier system and proximity to infrastructure.

Table 2 defines each CSM group waste site profile. All waste sites are binned into one of these CSM Groups based on these profiles.

Table 2. CSM Group Profiles

CSM Group	Outdoor Worker or Ecological Population Risk 0-15 ft bgs	Threat to Groundwater			Site-Specific Factors
		0-15 ft bgs	15-70 ft bgs	>70 ft bgs	
1a	Yes or Likely	Yes, Likely, or No	No	No	<ul style="list-style-type: none"> • Would not potentially be under a canyon or nearby waste site cover system. • No insurmountable geographic interferences (e.g., utilities, roads, structures).
1b	No or Unlikely	No or Unlikely	No	No	<ul style="list-style-type: none"> • No insurmountable geographic interferences (e.g., utilities, roads, structures).
1c	Yes or Likely	Yes, Likely, or No	No	No	<ul style="list-style-type: none"> • Would not potentially be under a canyon or nearby waste site cover system. • Coordination required with co-located waste site not in CSM Group 1.
2	No	No	Yes or Likely	Yes, No, Likely, or Unlikely	<ul style="list-style-type: none"> • Would not potentially be under a canyon or nearby waste site cover system.
4	Yes or Likely	Yes, No, Likely, or Unlikely	Yes or Likely	Yes, No, Likely, or Unlikely	<ul style="list-style-type: none"> • Excavation of these waste sites is expected to trigger TRU disposal criteria eliminating onsite waste disposal options.
6a	Yes or Likely	Yes, No, Likely, or Unlikely	Yes or Likely	No or Unlikely	<ul style="list-style-type: none"> • Would not potentially be under a canyon or nearby waste site cover system.

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

Table 2. CSM Group Profiles

CSM Group	Outdoor Worker or Ecological Population Risk 0-15 ft bgs	Threat to Groundwater			Site-Specific Factors
		0-15 ft bgs	15-70 ft bgs	>70 ft bgs	
6b	Yes or Likely	Yes, No, Likely, or Unlikely	Yes or Likely	Yes or Likely	<ul style="list-style-type: none"> • Would not potentially be under a canyon or nearby waste site cover system.
7	No profile – all unique waste sites that will be individually evaluated				

2.3 Representative Waste Sites

A representative waste site(s) is identified for each CSM group and serves as its site-specific data source to:

- Define basis for action,
- Evaluate response actions,
- Identify preferred response action, and
- Select an alternative in the Record of Decision following the Proposed Plan public review.

The representative site provides a reasonable representation of the range of conditions for the analogous waste sites within the CSM group. During representative site selection, preference was given to 200-EA-1, 200-WA-1, and 200-BC-1 OU waste sites with existing analytical data. Flexibility in the site selection was provided to acknowledge waste sites from other OUs could serve as a better representative site. The RASCAL team reviewed existing information for the representative waste sites and determined if additional information is needed to determine the basis for action and evaluate response actions in the pre-ROD RI/FS tasks. Table 3 identifies the response actions potentially applicable to each CSM group as a tool to guide the identification of information needs.

Table 3. Potential Response Actions for each CSM Group

CSM Group	CS/NFA ^a	ICs Only	Soil Cover	Infiltration Barrier	Stabilization and Treatment	RTD	Integrate with GW Response
1a	No	No	No	No	No	Yes	No
1b	Yes	No	No	No	No	No	No
1c ^b	No	Yes	Yes	Yes	Yes	Yes	No
2	No	No	No	Yes	Yes	Yes	Yes
4	No	Yes	Yes	Yes	Yes	Yes	Yes
6a	No	Yes	Yes	Yes	Yes	Yes	No
6b	No	Yes	Yes	Yes	Yes	Yes	Yes
7	Yes/No	Yes	Yes	Yes	Yes	Yes	Yes

Note: Response actions may be combined to create one alternative.

a. No Action will be evaluated per CERCLA document process.

b. This waste site will be coordinated with the remedy for the co-located waste site.

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

The detailed pre-ROD field investigation activities for the representative waste sites will be detailed in the site's operable unit RI/FS Work Plan and associated Sampling and Analysis Plan. The representative waste sites recommended by the RASCAL team and the determination of additional information needs are summarized in Table 4.

Table 4. Representative Waste Sites

CSM Group	Representative Site (OU)	Additional pre-ROD information needs
1a	TBD ^a	None
1b	Not applicable	None
1c	Not applicable ^b	None
2	216-A-36B (200-EA-1)	4 field penetrations, consistent with WP Draft A SAP
4	216-Z-7 (200-WA-1)	No additional data needs, consistent with WP Draft A SAP
6a	TBD	TBD
6b	TBD	TBD
7	Not applicable	Not applicable

a. Representative site(s) will be selected from CSM 1a waste sites with existing data.

b. This a co-located single site and will not need a representative site.

3 New Early Final Action Operable Unit

The RASCAL team identified several CSM Group 1 waste sites that have opportunity to accelerate their cleanup. The candidate waste sites have sufficient existing site knowledge to define a remedial action bias toward either:

- CSM 1a: Removal, Treatment, and Disposal (i.e., contamination is at surface or <15 ft below grade and easily accessible for remediation) or
- CSM 1b: Confirmatory Sampling/No Further Action (i.e., a threat from contamination is not expected but needs to be confirmed with data)

The RASCAL team recommends establishing a new, early final action, co-regulator lead OU 200-IA-1 to implement accelerated actions for these waste sites. The new OU and the waste site assignment will follow the TPA change control form process. The 200-IA-1 OU will prepare a Focused Feasibility Study (FFS) followed by a PP and ROD that would apply the following concepts:

- Basis for action will leverage waste sites with existing data to quantify risk
- Only RTD, CS/NFA, and No Action will be considered in the FFS
- Accommodate the possibility that post-ROD sampling could indicate that a waste site should be assigned to a different CSM group within 200-IA-1 or moved to as CSM Group in the 200-EA-1 or 200-WA-1 OUs

4 200-BC-1 OU Accelerated Action

The 200-BC-1 OU and 200-WA-1 OU are combined in a single Work Plan. The RASCAL team, based on their waste site review and agreement that sufficient characterization exists, identified an opportunity to accelerate the 200-BC-1 OU waste site evaluation and remedy selection processes (i.e., FFS), independent of the 200-WA-1 OU project timeline. Accelerated decision-making needs to consider the following concepts:

- Previous representative and analogous waste site groupings require confirmation
- Prior basis for action determination (e.g., risk assessment) requires confirmation
- Excavation of one waste site in lieu of additional investigation (200-E-14 Settling Tank)

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

- Describe how post-ROD confirmatory sampling may cause re-evaluation of remedy

5 Update Existing Work Plans and Associated Implementation

Application of the representative and analogous waste site approach, requires updates to 200-EA-1 WP (DOE/RL-2016-58) and 200-WA-1/200-BC-1 WP (DOE/RL-2010-49) as follows:

- Incorporate representative and analogous waste site approach including CSM groups, representative waste sites, and representative site information needs, as proposed by the RASCAL team. The RASCAL team understands that the OU projects may reconsider CSM group assignments if new waste site information becomes available.
- Update waste site list to account for sites that have been assigned to the new 200-IA-1 OU.
- Define coordination process between OUs through the representative and analogous waste site approach implementation.
- Modify sampling and analysis plan (SAP) to include only defined pre-ROD characterization for representative and unique waste sites (i.e., CSM Group 7).
- Update schedule to reflect revised approach.

During the RI and FS phases of the projects, the OU project teams should collaborate on the following to ensure consistency in their application of the representative and analogous waste site approach:

- Share representative site data and align on any necessary reassignment of waste sites to CSM groups and, or select a different representative waste site
- Define basis for action for CSM group's representative site (Table 4) and apply the bases to the group's analogous waste sites
- Develop alternatives for CSM groups, including defining the range of alternatives necessary to facilitate waste sites plugging in/out of CSM groups without revisiting the FS evaluations
- Analyze alternatives for CSM groups

During the selection and implementation of final remedies, the OU project teams should collaborate on the following to ensure similar waste sites have consistent remedies:

- Post-ROD characterization approaches focused on key parameters that confirm actual site conditions meet the profile for the assigned CSM group.
- Explanation in public meetings and in the PP as to how the representative and analogous waste site approach works, including how post-ROD confirmation sampling could result in an Explanation of Significant Differences or ROD Amendment
- Explanation of the potential for the decision documents to accommodate the reassignment of waste sites (e.g., confirmatory sampling waste site may plug-out to a more appropriate CSM group and/or OU)
- Implementation and prioritization of remedial actions in geographic areas (i.e., SQUIDS) showing integration across multiple OUs

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

Attachment A: Conceptual Site Model Group Summary Tables

Provided are the waste sites and associated conceptual site model groups related to 200-EA-1, 200-WA-1, 200-BC-1, Operable Units (OUs). The representative waste site is highlighted, where applicable. Each table is organized by OU, followed by the waste site in alpha-numeric order. Upon IAMIT agreement, the CSM Groups 1a and 1b waste sites will be assigned to the new 200-IA-1 OU as discussed in Section 3 of the main document. The associated SQUID is provided for informational purposes only.

A.1 Conceptual Site Model Group 1 Summary Table

CSM group 1 is divided into 3 subgroups that are presented in Tables A-1, A-2, and A-3.

Table A-1. CSM Group 1a Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-EA-1	200-E BP	Burn Pit	ELF2-2
	200-E-109	Contamination Migration	ELF2-2
	200-E-115	Unplanned Release	C Farm-1
	200-E-117	Unplanned Release	B Plant Main
	200-E-123	Unplanned Release	BOE-4
	200-E-125	Unplanned Release	A Farms-1
	200-E-129	Unplanned Release	B Plant North
	200-E-130	Unplanned Release	BOE-3
	200-E-139	Unplanned Release	BOE-8
	200-E-142	Depression/Pit (nonspecific)	B Plant Main
	200-E-209-PL	Process Sewer	B Plant North
	200-E-25	French Drain	B Plant North
	200-E-26	Unplanned Release	BOE-3
	200-E-262-PL	Radioactive Process Sewer	BOE-7
	200-E-287	Contamination Migration	BOE-8
	200-E-292	Dumping Area	BOE-2
	200-E-293	Foundation	BOE-5
	200-E-43	Storage	BOE-9
	200-E-53	Unplanned Release	ELF2-2
	207-B	Retention Basin	BOE-4
	216-A-34	Ditch	BOE-8
	216-A-40	Retention Basin	A Farms-1
	UPR-200-E-50	Unplanned Release	ELF2-2
UPR-200-E-64	Contamination Migration	BOE-3	
UPR-200-E-66	Unplanned Release	BOE-7	
200-WA-1	200-W-106	Unplanned Release	BOW-4
	200-W-127	Unplanned Release	BOW-8
	200-W-21	Pump Station	T Plant West
	200-W-22	Unplanned Release	REDOX Main

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Table A-1. CSM Group 1a Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
	200-W-54	Contamination Migration	BOW-6
	200-W-6	Dumping Area	BOW-5
	200-W-67	Unplanned Release	BOW-5
	200-W-85	Unplanned Release	U Plant North
	200-W-92	Dumping Area	T Farms-1
	207-S	Retention Basin	REDOX West
	207-T	Retention Basin	BOW-7
	207-U	Retention Basin	BOW-5
	UPR-200-W-103	Unplanned Release	PFP Main
	UPR-200-W-116	Unplanned Release	REDOX Main
	UPR-200-W-14	Unplanned Release	T Farms-1
	UPR-200-W-166	Unplanned Release	BOW-7
	UPR-200-W-23	Unplanned Release	PFP Main
	UPR-200-W-76	Unplanned Release	BOW-5
	UPR-200-W-99	Unplanned Release	BOW-8

Table A-2. CSM Group 1b Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-EA-1	200-E-121	Unplanned Release	BOE-1
	200-E-13	Dumping Area	BOE-6
	200-E-27	Dumping Area	A Farms-1
	200-E-276-PL	Radioactive Process Sewer	A Farms-1
	200-E-297	Dumping Area	BOE-4
	207-A-NORTH	Retention Basin	BOE-8
	207-A-SOUTH	Retention Basin	BOE-8
	216-A-38-1	Crib	PUREX South
	216-A-41	Crib	A Farms-1
	UPR-200-E-143	Unplanned Release	A Farms-1
	UPR-200-E-43	Unplanned Release	BOE-1
	UPR-200-E-89	Unplanned Release	BOE-1
	UPR-200-E-99	Unplanned Release	A Farms-1
200-WA-1	200-W-1	Mud Pit	REDOX West
	200-W-11	Dumping Area	BOW-3
	200-W-12	Dumping Area	BOW-2
	200-W-13	Unplanned Release	BOW-5
	200-W-14	Unplanned Release	BOW-5

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Table A-2. CSM Group 1b Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
	200-W-2	Spoils Pile/Berm	REDOX West
	200-W-53	Unplanned Release	BOW-7
	200-W-63	Unplanned Release	BOW-4
	200-W-77	Unplanned Release	U Plant West
	200-W-80	Spoils Pile/Berm	T Plant Main
	200-W-82	Product Piping	BOW-8
	200-W-83	Unplanned Release	BOW-5
	200-W-86	Unplanned Release	U Plant North
	600-70	Dumping Area	ERDF Main
	UPR-200-W-165	Unplanned Release	BOW-6
	UPR-200-W-33	Unplanned Release	U Plant Main
	UPR-200-W-4	Unplanned Release	T Plant West
	UPR-200-W-55	Unplanned Release	U Plant Main
	UPR-200-W-63	Unplanned Release	BOW-8

Table A-3. CSM group 1c Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-EA-1	216-A-42	Retention Basin	BOE-7

A.2 Conceptual Site Model Group 2 Summary Table

CSM group 2 is presented in Table A-4.

Table A-4. CSM Group 2 Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-EA-1	216-A-10	Crib	PUREX South
	216-A-36A	Crib	PUREX South
	216-A-36B	Crib	PUREX South
200-WA-1	216-S-23	Crib	BOW-6

Note: Representative site is highlighted.

A.3 Conceptual Site Model Group 4 Summary Table

CSM group 4 is presented in Table A-5.

Table A-5. CSM Group 4 Summary Table

OU (9/2019)	Waste Site	WIDS waste site type	SQUID
200-BC-1	216-B-53A	Trench	BOW-1
200-WA-1	216-S-1&2	Crib	REDOX West

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Table A-5. CSM Group 4 Summary Table

OU (9/2019)	Waste Site	WIDS waste site type	SQUID
	216-Z-7	Crib	PFP North
	UPR-200-W-36	Unplanned Release	REDOX West

Representative site is highlighted.

A.4 Conceptual Site Model Group 6 Summary Table

The RASCAL project team is still determining the final binning locations for CSM group 6. Some of the wastes sites listed in the CSM group 6 may move to the CSM group 1 or other CSM groups. Once CSM Group 6 waste site binning is complete, a representative waste site will be selected. CSM group 6 is presented in Tables A-6 and A-7.

Table A-6. CSM 6a Group Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-BC-1	216-B-20	Trench	BOW-1
	216-B-21	Trench	BOW-1
	216-B-22	Trench	BOW-1
	216-B-23	Trench	BOW-1
	216-B-24	Trench	BOW-1
	216-B-25	Trench	BOW-1
	216-B-26	Trench	BOW-1
	216-B-27	Trench	BOW-1
	216-B-28	Trench	BOW-1
	216-B-29	Trench	BOW-1
	216-B-30	Trench	BOW-1
	216-B-31	Trench	BOW-1
	216-B-32	Trench	BOW-1
	216-B-33	Trench	BOW-1
	216-B-34	Trench	BOW-1
	216-B-52	Trench	BOW-1
	216-B-53B	Trench	BOW-1
216-B-54	Trench	BOW-1	
216-B-58	Trench	BOW-1	
200-EA-1	200-E-57	Unplanned Release	BOE-5
	216-A-1	Crib	BOE-8
	216-B-51	French Drain	BOE-1
	216-B-59	Trench	BOE-4
	216-C-4	Crib	BOE-5
	216-C-5	Crib	BOE-5
	216-C-7	Crib	BOE-5
	UPR-200-E-21	Unplanned Release	BOE-7
	UPR-200-E-29	Unplanned Release	BOE-7
UPR-200-E-88	Unplanned Release	BOE-9	

**Representative and Analogous Waste Site Approach to Accelerate
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Table A-6. CSM 6a Group Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-WA-1	200-W-171	Unplanned Release	PFP Main
	200-W-172	Unplanned Release	PFP Main
	200-W-71	Trench	U Plant South
	200-W-9	Unplanned Release	T Plant Main
	216-S-12	Trench	REDOX North
	216-S-14	Trench	BOW-3
	216-S-18	Trench	BOW-6
	216-S-22	Crib	REDOX Main
	216-S-25	Crib	BOW-3
	216-SX-2	Crib	S Farms-1
	216-T-10	Trench	T Plant Main
	216-T-11	Trench	T Plant Main
	216-T-13	Trench	T Farms-1
	216-T-20	Trench	BOW-5
	216-T-9	Trench	T Plant Main
	216-U-13	Trench	U Farm-1
	216-U-14	Ditch	BOW-5
	216-U-15	Trench	U Plant North
	216-U-3	French Drain	BOW-5
	216-U-4B	French Drain	U Plant Main
	216-U-5	Trench	U Plant North
	216-U-6	Trench	U Plant North
	216-Z-13	French Drain	PFP Main
	216-Z-14	French Drain	PFP Main
	216-Z-15	French Drain	PFP Main
	216-Z-4	Trench	PFP North
	216-Z-6	Crib	PFP North
	218-W-9	Burial Ground	REDOX West
	UPR-200-W-111	Unplanned Release	BOW-5
	UPR-200-W-112	Unplanned Release	BOW-5
UPR-200-W-19	Unplanned Release	U Plant West	
UPR-200-W-39	Unplanned Release	U Plant Main	

Table A-7. CSM 6b Group Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
200-BC-1	216-B-14	Crib	BOW-1
	216-B-15	Crib	BOW-1
	216-B-16	Crib	BOW-1
	216-B-17	Crib	BOW-1

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Table A-7. CSM 6b Group Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
	216-B-18	Crib	BOW-1
	216-B-19	Crib	BOW-1
200-EA-1	200-E PD	Ditch	BOE-9
	200-E-56	Unplanned Release	BOE-5
	209-E-WS-2	French Drain	BOE-5
	216-A-18	Trench	BOE-8
	216-A-19	Trench	BOE-8
	216-A-20	Trench	BOE-8
	216-A-27	Crib	PUREX South
	216-A-29	Ditch	BOE-8
	216-A-3	Crib	PUREX Main
	216-A-30	Crib	BOE-7
	216-A-37-1	Crib	BOE-7
	216-A-37-2	Crib	BOE-7
	216-A-45	Crib	PUREX South
	216-A-6	Crib	BOE-7
	216-A-9	Crib	BOE-9
	216-B-10A	Crib	BOE-3
	216-B-10B	Crib	BOE-3
	216-B-12	Crib	BOE-3
	216-B-55	Crib	BOE-3
	216-B-59B	Retention Basin	BOE-4
	216-B-62	Crib	BOE-3
	216-B-63	Ditch	BOE-4
	216-C-1	Crib	BOE-5
	216-C-10	Crib	BOE-5
	216-C-3	Crib	BOE-5
	216-C-6	Crib	BOE-5
UPR-200-E-144	Unplanned Release	B Farms-1	
200-WA-1	216-S-20	Crib	REDOX South
	216-S-4	French Drain	CP-5
	216-S-5	Crib	CP-4
	216-S-6	Crib	BOW-3
	216-S-7	Crib	REDOX West
	216-S-8	Trench	REDOX West
	216-T-12	Trench	BOW-7
	216-T-27	Crib	BOW-8
	216-T-28	Crib	BOW-8
	216-T-33	Crib	T Plant Main
	216-T-34	Crib	T Plant West

Representative and Analogous Waste Site Approach to Accelerate Central Plateau Inner Area Cleanup Decisions

Table A-7. CSM 6b Group Summary Table

OU (9/2019)	Waste Site	WIDS Waste Site Type	SQUID
	216-T-35	Crib	T Plant West
	216-T-36	Crib	T Farms-1
	216-T-4-1D	Ditch	BOW-7
	216-T-8	Crib	T Plant South
	216-U-1&2	Crib	U Plant West
	216-U-12	Crib	U Plant West
	216-U-16	Crib	U Plant West
	216-U-17	Crib	U Plant South
	216-U-8	Crib	U Plant West
	216-Z-16	Crib	PFP North
	216-Z-17	Trench	PFP North

A.5 Conceptual Site Model Group 7 Summary Table

The RASCAL project team is still determining the final binning locations for CSM group 7 wastes sites. Some of the wastes sites listed in the CSM group 7 tables may move to other CSM groups. CSM group 7 is presented in Table A-8.

Table A-8. CSM 7 Group Summary Table

OU (9/2019)	Waste Site	WIDS waste site type	SQUID
200-BC-1	200-E-14	Settling Tank	BOW-1
200-EA-1	200-E-124	Unplanned Release	PUREX Main
	200-E-249-PL	Process Sewer	BOE-5
	200-E-251-PL	Radioactive Process Sewer	BOE-5
	200-E-252-PL	Radioactive Process Sewer	BOE-5
	200-E-294	Foundation	BOE-5
	200-E-4	French Drain	BOE-5
	200-E-41	Unplanned Release	BOE-5
	201-C	Process Unit/Plant	BOE-5
	216-B-2-1	Ditch	BOE-4
	216-B-2-2	Ditch	BOE-4
	216-B-2-3	Ditch	BOE-4
	216-C-2	Injection/Reverse Well	BOE-5
	218-E-7	Burial Vault	B Plant Main
	2607-E12	Septic Tank	BOE-8
	2607-E3	Septic Tank	BOE-3
	2607-E5	Septic Tank	BOE-5
	2607-E6	Septic Tank	BOE-9
2607-E7A	Septic Tank	BOE-5	
2607-E7B	Septic Tank	BOE-5	
2607-E9	Septic Tank	B Farms-1	

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Table A-8. CSM 7 Group Summary Table

OU (9/2019)	Waste Site	WIDS waste site type	SQUID
	2607-EA	Septic Tank	A Farms-1
	2607-EF	Septic Tank	B Farms-1
	291-C	Process Unit/Plant	BOE-5
	291-C-1	Burial Ground	BOE-5
	HSVP	Valve Pit	BOE-5
	UPR-200-E-10	Unplanned Release	BOE-9
	UPR-200-E-11	Unplanned Release	BOE-9
	UPR-200-E-112	Unplanned Release	ELF1-1
	UPR-200-E-12	Unplanned Release	BOE-9
	UPR-200-E-20	Unplanned Release	BOE-9
	UPR-200-E-33	Unplanned Release	BOE-9
	UPR-200-E-37	Unplanned Release	BOE-5
	UPR-200-E-69	Unplanned Release	B Plant North
	UPR-200-E-95	Unplanned Release	ELF1-1
	UPR-200-E-98	Unplanned Release	BOE-5
200-WA-1	200-W-100-PL-X	Encased Tank Farm Pipeline	U Plant Main
	200-W-105-PL-X	Encased Tank Farm Pipeline	U Plant Main
	200-W-128	Unplanned Release	WLF-1
	200-W-15	Unplanned Release	REDOX South
	200-W-192-PL-A	Radioactive Process Sewer	U Plant Main
	200-W-192-PL-X	Radioactive Process Sewer	U Plant Main
	200-W-193-PL-A	Radioactive Process Sewer	U Plant Main
	200-W-193-PL-X	Radioactive Process Sewer	U Plant Main
	200-W-195-PL	Radioactive Process Sewer	REDOX South
	200-W-209-PL-A	Radioactive Process Sewer	PFP Main
	200-W-209-PL-B	Radioactive Process Sewer	PFP South
	200-W-216-PL	Radioactive Process Sewer	PFP Main
	200-W-219-PL-A	Radioactive Process Sewer	PFP Main
	200-W-219-PL-B	Radioactive Process Sewer	PFP South
	200-W-224-PL-A	Radioactive Process Sewer	PFP Main
	200-W-224-PL-B	Radioactive Process Sewer	PFP South
	200-W-225-PL-A	Radioactive Process Sewer	PFP Main
	200-W-225-PL-B	Radioactive Process Sewer	PFP South
	200-W-228-PL-A	Radioactive Process Sewer	PFP Main
	200-W-228-PL-B	Radioactive Process Sewer	PFP South
	200-W-229-PL-A	Radioactive Process Sewer	PFP Main
200-W-229-PL-B	Radioactive Process Sewer	PFP South	
200-W-231	Septic Tank	T Farms-1	

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Table A-8. CSM 7 Group Summary Table

OU (9/2019)	Waste Site	WIDS waste site type	SQUID
	200-W-244-PL	Encased Transfer Piping	U Plant Main
	200-W-248-PL	Direct Buried Tank Farm Pipeline	U Plant Main
	200-W-42	Radioactive Process Sewer	U Plant West
	200-W-51	Septic Tank	BOW-5
	200-W-75	Experiment/Test Site	REDOX Main
	200-W-81	Unplanned Release	WLF-2
	200-W-84-PL-A	Radioactive Process Sewer	U Plant Main
	200-W-84-PL-X	Radioactive Process Sewer	U Plant Main
	200-W-87	Unplanned Release	U Plant North
	200-W-89	Foundation	U Plant Main
	200-W-90	Unplanned Release	WLF-1
	207-Z	Retention Basin	PFP South
	216-T-2	Injection/Reverse Well	T Plant Main
	216-T-29	French Drain	T Plant Main
	216-T-31	French Drain	T Farms-1
	216-U-4	Injection/Reverse Well	U Plant Main
	216-U-4A	French Drain	U Plant Main
	216-U-7	French Drain	U Plant Main
	218-W-8	Burial Vault	T Plant South
	231-W-151	Receiving Vault	PFP North
	241-T-361	Settling Tank	T Plant West
	241-U-361	Settling Tank	U Plant West
	241-UX-154	Diversion Box	U Plant Main
	241-UX-302A	Catch Tank	U Plant Main
	241-WR VAULT	Receiving Vault	U Plant Main
	241-Z	Neutralization Tank	PFP South
	2607-W3	Septic Tank	T Plant West
	2607-W4	Septic Tank	T Plant Main
	2607-W5	Septic Tank	U Plant West
	2607-W7	Septic Tank	U Plant Main
	2607-W8	Septic Tank	PFP North
	2607-WC	Septic Tank	S Farms-1
	2607-WZ	Septic Tank	S Farms-1
	2607-Z	Septic Tank	PFP North
	2607-Z1	Septic Tank	PFP Main
	270-W	Neutralization Tank	U Plant Main
	600-284-PL-X	Encased Tank Farm Pipeline	U Plant Main
	UPR-200-W-101	Unplanned Release	U Plant Main

Representative and Analogous Waste Site Approach to Accelerate
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Table A-8. CSM 7 Group Summary Table

OU (9/2019)	Waste Site	WIDS waste site type	SQUID
	UPR-200-W-117	Unplanned Release	U Plant North
	UPR-200-W-118	Unplanned Release	U Plant Main
	UPR-200-W-138	Unplanned Release	U Plant Main
	UPR-200-W-162	Unplanned Release	U Plant Main
	UPR-200-W-3	Unplanned Release	T Plant West
	UPR-200-W-41	Unplanned Release	REDOX Main
	UPR-200-W-46	Unplanned Release	REDOX North
	UPR-200-W-48	Unplanned Release	U Plant North
	UPR-200-W-51	Unplanned Release	S Farms-2
	UPR-200-W-60	Unplanned Release	U Plant North
	UPR-200-W-65	Unplanned Release	T Plant Main
	UPR-200-W-67	Unplanned Release	T Plant Main
	UPR-200-W-73	Unplanned Release	T Plant West
	UPR-200-W-78	Unplanned Release	U Plant Main
	UPR-200-W-82	Unplanned Release	REDOX Main

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