



# Focus Sheet

## Environmental Restoration Disposal Facility Leachate De-Listing Proposal

U.S. Department of Energy • U.S. Environmental Protection Agency • Washington State Department of Ecology

### REQUEST FOR PUBLIC COMMENT

The U.S. Environmental Protection Agency, U.S. Department of Energy, and Washington State Department of Ecology (Tri-Parties) want your opinion on a proposal to de-list the Environmental Restoration Disposal Facility's (ERDF) leachate waste. Leachate waste is generated from the infiltration of precipitation through the wastes placed in the ERDF. De-listing of the leachate would be protective of human health and the environment and will allow it to be managed under a less stringent and more cost-effective program.

**Public comments will be accepted from November 2 to December 1, 1998.** All public comments will be considered and responded to before a final decision is made. If you would like to review the petition, please visit the public information repository nearest you.

### BACKGROUND

The Tri-Parties have entered into numerous agreements for the cleanup of the Hanford Site. To date, the remedy chosen for cleanup of most of the soil sites has been to excavate and dispose of the contaminated waste. In order to effectively manage the waste, and in anticipation of the need for additional on-site disposal capacity, the Tri-Parties issued a Record of Decision (ROD) in January of 1995 to enable construction of the ERDF. The ERDF is authorized to accept waste originating from cleanup of the Hanford Site.

The construction of the first two ERDF disposal cells began in February 1995. The ERDF is constructed as a single disposal trench that is 70-ft-deep and currently consists of two side-by-side cells that are 1,420-ft long by 720-ft wide at the top. The facility is equipped with a double-liner and leachate

**To request a copy of the petition, or to submit comments either written or electronically, please contact:**

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**Or call the Hanford Clean Up Toll-free Line at 1-800-321-2008.**

collection and recovery system. The first waste was placed in ERDF in July of 1996 and as of July 1998, ERDF had received over 1 million tons of Hanford cleanup waste.

The ERDF ROD specified that expansion of the facility would be authorized on an as-needed basis. Phase II expansion of the ERDF was authorized by an ERDF ROD Amendment issued in September 1997. Phase II construction began in September 1998 and is scheduled for completion by October 1999. The Phase II disposal cells are the same design as the first two cells.

## Leachate Generation

The advantages of the lined trench design system apply primarily during the operational period. The leachate is primarily water from precipitation and water used for dust suppression collected in the disposal cells and pumped to holding tanks before it is sent to the 200 Area Effluent Treatment Facility (ETF). The leachate is currently considered to be a listed hazardous waste because of the potential that it could have percolated through a small amount of soil disposed in ERDF that is designated as a listed hazardous waste. In order to delist the leachate as a hazardous waste, it must be demonstrated that the concentrations of hazardous contaminants found in the leachate are below health based limits.

In July 1996, an Explanation of Significant Difference (ESD) to the ERDF ROD was issued which authorized the conditional use of the leachate for dust suppression and waste compaction in the disposal trench. The ERDF ESD stated the intent to delist the leachate from regulation as a hazardous waste when sufficient data became available to support a determination that the liquid is nonhazardous. Sampling and analysis of the leachate have indicated the leachate would not be considered hazardous.

Currently, some of the leachate is used for dust control and waste compaction within the trench. However, large quantities of excess leachate are generated during periods of high rainfall, as in the

previous two years. Because of the hazardous waste listing, excess leachate must be transported by tanker truck to the ETF. Such handling is not cost effective and may not be warranted since chemical analysis of the leachate has shown the concentrations of contaminants to be very low. The amount of leachate generated at ERDF to date is approximately 2 million gallons.

## DESCRIPTION OF PROPOSAL

### Proposed Delisting

To facilitate handling the ERDF leachate as a nonhazardous waste, a proposed plan has been developed that describes the rationale for proposing the delisting. Also, a draft of the delisting petition is available for review. The petition provides details on how the leachate must comply with defined chemical concentration levels. It would allow for the leachate to be delisted on the condition that it remain below the prescribed limits. Details concerning future leachate sampling and analysis are also specified in the petition. In combination with the petition, a ROD Amendment would also be issued.

Under this approach, delisting would allow for a more cost-effective management of excess leachate without posing a threat to human health or the environment. Leachate could continue to be used for dust suppression and waste compaction within the disposal trench and the excess would be conveyed to ETF for treatment through a pipeline.

## Hanford Public Information Repository Locations:

### PORTLAND

Portland State University  
Branford Price Millar Library Science and  
Engineering Floor  
Tri-Party Information Repository  
934 SW Harrison and Park  
(503) 725-3690  
Attn: Michael Bowman

### SEATTLE

University of Washington  
Suzzallo Library  
Government Publications Room  
(206) 543-4664  
Attn: Eleanor Chase

### RICHLAND

U.S. Department of Energy Public Reading  
Room, Washington State University, Tri-Cities  
Consolidated Information  
Center, Room 101L  
2770 University Drive  
(509) 372-7443  
Attn: Terri Traub

### SPOKANE

Gonzaga University  
Tri-Party Information Repository, Foley Center  
E 502 Boone  
(509) 324-5932  
Attn: Tim Fuhrman