



U.S. Department of Energy Hanford Site

21-PFD-002506

August 26, 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 ASPHALT, SOILS, AND DEBRIS FROM THE EFFLUENT TREATMENT FACILITY LOAD-IN EXPANSION PROJECT IN THE ENVIRONMENTAL RESTORATION DISPOSAL FACILITY

This letter requests U.S. Environmental Protection Agency (EPA) authorization for disposal at the Environmental Restoration Disposal Facility (ERDF) under the “plug-in” approach, the Effluent Treatment Facility (ETF) asphalt, soils, and debris generated in support of the Load-In Expansion Project construction activities. The project will generate a small volume of waste for disposal at 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 amended remedy provides that specific waste generated at the Hanford Site be disposed of at ERDF. The selected remedy also identified a plug-in approach for disposal at the ERDF, additional similar Hanford waste generated in support of Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) cleanup actions.

The U.S. Department of Energy, Office of River Protection (DOE) has identified additional Hanford candidate wastes that will originate from construction activities performed in support of the ETF Load-in Expansion Project. These wastes are similar in characteristics and description to wastes identified in Table 1, and therefore DOE requests EPA approval for disposal of these wastes into ERDF. DOE is prepared to follow the same ERDF disposal implementation and acceptance process as is used for wastes in Table 1. DOE also recognizes that the generation, treatment, and other management of such waste prior to and during storage would be governed by otherwise applicable requirements.

This waste meets 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 RCRA and 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-only wastes. The following activities will be performed prior to waste disposal at the ERDF:

- 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 is requested from EPA to authorize the waste generated in support of the ETF Load-In Expansion Project construction activities for disposal at the ERDF under the “plug-in” approach.

If you have any questions, please contact me, or your staff may contact Mark French, Director, Project and Facilities Division, on (509) 373-9863.

Sincerely,

William F. Hamel

Digitally signed by William F. Hamel
Date: 2021.08.26 13:03:07 -07'00'

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

PFD:BAS

cc: See page 3

cc: J. Bell, NPT
D. B. Bowen, Ecology
S. L. Brasher, HMIS
R. Buck, Wanapum
L. Contreras, YN
S. W. Davis, HMIS
D. R. Einan, EPA
N. M. Menard, Ecology
M. Murphy, CTUIR
S. N. Schleif, Ecology
S. Wiegman, HAB
M. Woods, ODOE
Administrative Record (ERDF)
Environmental Portal