U.S. Department of Energy
Hanford Site

22-PFD-001399 June 9, 2022

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 TANK OPERATIONS CONTRACTOR FOR CONSTRUCTION ACTIVITIES FOR THE TANK-SIDE CESIUM REMOVAL ADMINISTRATION CONTROL BOUNDARY

This letter requests U.S. Environmental Protection Agency authorization for disposal at the Environmental Restoration Disposal Facility (ERDF) under the "plug-in" approach, in support of the Tank-Side Cesium Removal (TSCR) administrative control boundary project construction activities. The waste consists of asphalt, concrete, wood, soil, and other miscellaneous debris from construction activities around the TSCR facilities. Waste was generated inside of the Grout Treatment Facility (GTF) Waste Information Data System (WIDS) site that includes the following list of underground WIDS pipelines:

- 200-E-127-PL-C: Pipeline from the Plutonium Uranium Extraction Plant (PUREX) to Gable and B-ponds (216-A-25 and 216-B-3); PUREX Cooling Water Line
- 200-E-127-PL-B: Pipeline from PUREX to Gable and B-ponds; 200-E-127-PL; Line 1601; Line 8823; PUREX Cooling Water Line
- 200-E-232-PL-B: Pipeline from 207-A Basins to 216-A-30 and 216-A-371 Cribs
- 200-E-308-PL: Grout facility feed line and Excess Water Line; GTF Feed Line: SN-621

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 the ERDF. The selected remedy also identified a plug-in approach for disposal at the ERDF, additional similar Hanford-generated waste in support of Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) cleanup actions.

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 (LDR) 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-generated waste. 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 LDR standards and other requirements.

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: 2022.06.09 17:29:00 -07'00'

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

PFD:BAS

cc: See page 3

cc: J. Bell, NPT
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Administrative Record (ERDF)
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