

**Draft Advice: ERDF ROD Amendment
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Author: Pam Larsen

BACKGROUND

The Department of Energy (DOE) is seeking to move forward with CERCLA cleanup at Hanford in a manner that addresses the RCRA Land Disposal Restrictions (LDRs) for a limited amount of large, heavy hazardous waste debris that is contaminated with radioactive material. The current plan contained in a Record of Decision (ROD) is to dispose of this material in the on-site ERDF landfill. DOE is seeking a CERCLA ARAR waiver to treat this debris to EPA standards (RCRA LDRs) after the waste is placed in an on-site disposal cell. The process proposed is referred to as macroencapsulation.

The RCRA LDRs require treatment of RCRA hazardous waste prior to placement in land disposal units. The RCRA LDRs are a key cornerstone of the RCRA regulatory program and are considered applicable or relevant and appropriate (ARARs) for the purposes of a CERCLA response action. The ERDF is an on-site CERCLA disposal unit designed and constructed to meet the RCRA hazardous waste landfill requirements.

All waivers to ARARs need to be supported by the Administrative Record and public notice and comment are needed prior to a decision to grant the waiver.

The waiver would allow for treatment by macroencapsulation, of certain wastes inside the ERDF facility and will be based on the CERCLA waiver where site conditions suggest "compliance with ARAR requirements will result in greater risk to human health and the environment."

ADVICE

The HAB advises the Environmental Protection Agency to amend the Record of Decision for the ERDF landfill to allow macroencapsulation of appropriate waste. This will achieve environmental protection while reducing worker exposure to the radioactive, heavy, and irregular materials at a significant cost savings.