



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
**HANFORD/INL PROJECT OFFICE**  
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SUPERFUND AND  
EMERGENCY  
MANAGEMENT  
DIVISION

April 23, 2020

Bill Hamel  
Assistant Manager for the River and Plateau  
Richland Operations Office, Mail Stop H5-20  
Department of Energy  
PO Box 550  
Richland, Washington 99352

**RE: Interim Stabilization of Waste Sites 216-Z-2 Crib, 216-Z-9 Trench, and 241-Z-361  
Settling Tank (20-AMRP-0006)**

Dear Mr. Hamel:

The U.S. Environmental Protection Agency (EPA) received your February 18, 2020 letter in reference to the subject line above regarding the stabilization of three waste sites located in the 200-PW-1 Operable Unit (OU). EPA understands the importance of addressing structural integrity issues at the Hanford Site and the associated potential to release contamination or disrupt the Hanford cleanup mission, including from these three sites. We also understand that DOE is proceeding under its authority provided by Executive Order 12580 to conduct removal actions and acknowledge that removal actions do not require the approval of EPA. In the February 18 letter, DOE requested EPA issue a joint action memo, however, EPA will not be signing or concurring on the action memo for the time-critical removal action for these stabilization activities due to the concerns outlined below.

CERCLA Section 104(a)(2) states "Any removal action undertaken by the President under this subsection (or by any other person referred to in section 122) should, to the extent the President deems practicable, contribute to the efficient performance of any long term remedial action with respect to the release or threatened release concerned." EPA requests that additional information be provided in support of DOE pursuing a removal action for these waste sites. Specifically, information is needed to demonstrate how these activities will contribute to the efficient performance for implementation of the selected long-term remedial action identified in the 2011 Record of Decision (ROD) for the 200-CW-5 and 200-PW-1/3/6 OUs. The letter states that DOE does not intend, or expect, this action to impact overall completion (schedule or budget) of the 200-CW-5 and 200-PW-1/3/6 scope; however, EPA expects more site-specific information to be provided in the Action Memo along with details on the stabilization activities.

The structural evaluation of select aging structures that was conducted did not cite the 2011 ROD, specifically sections 12.2.2 and 12.2.3 which describe the removal, treatment (if needed), and disposal remedy selected for the 216-Z-9 Trench and 216-Z-2 Crib. Furthermore, the report included recommendations for how to stabilize these waste sites without considering the requirements from the 2016 Remedial Design/Remedial Action Work Plan for the 200-CW-5, 200-PW-1/3/6 OUs identifies stabilization of excavation areas with cave-in or subsidence potential, and removal of structures and debris. EPA expects the Action Memo to be consistent with, and not preclude, the existing remedy.

Given that there were 27 structures that may have needed risk-mitigation work identified in the 2018 *Aging Structures Risk Assessment* and 11 of the structures were analyzed further in the 2019 *Structural Assessment of Aging Legacy Buried Cribs and Tanks at the Hanford Central Plateau*, the need to move forward with a time-critical removal action instead of a non-time critical removal action does not seem fully justified. While EPA appreciates DOE beginning a public comment period on this removal action before beginning field activities, the public would have been better involved in the decision-making process by the approach used for a non-time critical removal action where an Engineering Evaluation/Cost Analysis (EE/CA) is issued for public comment before a decision is made. EPA looks forward to a response to comments for any significant public comments received during the public comment period.

We look forward to continuing to work in a collaborative manner on efforts that potentially impact remedial work in the 200-PW-1 OU. We appreciate the regular meetings our agencies have had since October 2019 and understand that we will continue to engage in regular communication to ensure remedial cleanup work continues to move forward, particularly for the 200-PW-1/3/6 and CW-5 OUs, and these stabilization activities. You or your staff are welcome to contact me at [Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov) or (202) 564-2724 with any questions or concerns on this topic.

Sincerely,

Emerald Laija  
Environmental Scientist

Cc (electronically):

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Administrative Record (216-Z-2 Crib,  
216-Z-9 Trench, 241-Z-361 Settling Tank, PW-1 OU)  
Environmental Portal