

## 8.0 Facility Disposition Process

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### 8.1 Introduction

The facility disposition process defines the approach by which DOE, with involvement of the lead regulatory agencies, will take a facility from operational status to its end state condition (final disposition) at Hanford. This is accomplished by the completion of facility transition, surveillance and maintenance (S&M), and disposition phase activities. The process is designed to integrate DOE Order 430.1B, *U.S. Department of Energy Real Property Asset Management*, September 24, 2003 and The Decommissioning Handbook (DOE/EM-0383, January 2000) and to ensure compliance with environmental regulations, including waste management, closure and post closure requirements under RCRA, and remedial and/or removal action requirements under CERCLA.

Facility disposition at Hanford will proceed on a priority-based path that results in an expedient and cost efficient transition of facilities to a safe and stable condition that presents no significant threat of release of hazardous substances into the environment and no significant risk to human health and the environment. The methodology allows for cases where higher priority Hanford cleanup activities warrant deferring regulated unit closure actions until prioritization decisions are made to proceed with the disposition phase.

Notwithstanding any other provision of Section 8.0, EPA and Ecology reserve the right to require closure in accordance with Federal and State hazardous waste law, and the Agreement, and to require response or corrective actions in accordance with RCRA and CERCLA and the Agreement, at any time. During the facility disposition process, DOE shall comply with all applicable environmental, safety and health, and security requirements.

#### 8.1.1 Background

The DOE consolidated virtually all of its waste management, remedial action and decontamination and decommissioning (D&D) program activities in 1989 into the Office of Environmental Management (EM). Within EM, the Office of Environmental Restoration was assigned responsibility for performing remedial actions, S&M, and dispositioning activities for DOE facilities. When Section 8.0, Facility Decommissioning Process, (now Facility Disposition Process) was initially included in the Tri-Party Agreement in 1995, many of the significant processing and operational facilities were awaiting a defined disposition process. The purpose of Section 8.0 was to establish a process that coordinated the requirements of DOE's decommissioning processes with the requirements of environmental regulations, such as RCRA and CERCLA, as they relate to disposition of facilities. As part of this effort, the parties identified "Key" facilities, or those that were determined to present sufficient potential environmental concern that coordination of the decommissioning process with cleanup activities under the Tri-Party Agreement was deemed necessary.

### 8.1.2 Applicability

Section 8.0 was applied to the transition, the S&M and/or the disposition of key facilities located on the Hanford Site that were not fully addressed under Section 6.0, TSD Process, or Section 7.0, Past-Practice Process, of this Action Plan. As used in Section 8, the term “facility” is defined to mean buildings and structures used for material handling and processing, storage, maintenance, administrative, or support activities on the Hanford Site and is not to be confused with the term “facility” as defined under WAC 173-303-040, CERCLA or RCRA. Facilities may be above or below grade and may be contaminated or uncontaminated.

Key Facilities subject to this Section 8.0 process identified by the parties included the following: PUREX, PFP (234-5Z and 236Z), B Plant, FFTF, UO3 Plant, U Plant, REDOX (202-S Building), and DOE’s old reactor buildings (specifically: 105-B, 105-C, 105-F, 105-D, 105-DR, 105-H, 105-KE, 105-KW, and 105/109-N buildings). As of February 2010, the Key facilities have been retired from active operation and are either (1) in S&M mode pending final disposition (e.g. B Plant, REDOX, and PUREX), (2) have final disposition decisions that are being implemented (U Plant and PFP), or (3) have completed their primary disposition phase and are being monitored in interim safe storage (e.g. most of the reactor buildings). The status of each of the Key facilities is described in Table 8-1.

Table 8-1. Status of “Key Facilities” as of March 2010

Facility	Status
<b>Canyon Buildings</b>	
PUREX	Deactivated in accordance with PUREX/UO3 Deactivation Project Management Plan (WHC-SP-1011D) and PUREX Deactivation End Point Criteria (WHC-SD-TPP-053). S&M performed in accordance with Surveillance and Maintenance Plan for the PUREX Facility (DOE/RL-98-35). Final disposition to be addressed using CERCLA remedial action coordinated with RCRA closure. Completion schedules to be established with RI/FS Work Plans and RD/RA Work Plans in accordance with Action Plan Section 11.6 (M-85 milestones) and closure conditions/schedules established in the Hanford Facility Dangerous Waste Permit.
B Plant	Deactivated in accordance with B Plant End Points Document (WHC-SD-TPP-054). S&M performed in accordance with Surveillance and Maintenance Plan for the 221-B Facility (B Plant) (DOE/RL-99-24). Final disposition to be addressed using CERCLA remedial action coordinated with RCRA closure. Completion schedules to be established with RI/FS Work Plans and RD/RA Work Plans in accordance with Action Plan Section 11.6. (M-85 milestones)
U Plant	Retired from active operations in approximately 1964; not formally deactivated. Final disposition and interim S&M in accordance with the Record of Decision for the 221-U [EPA 2005] and Remedial Design/Remedial Action Work Plan (DOE/RL-2006-21). (M-16 milestones)

Table 8-1. Status of “Key Facilities” as of March 2010

Facility	Status
<b>Canyon Buildings (continued)</b>	
REDOX	Retired from active operations in 1967; limited deactivation. S&M performed in accordance with Surveillance and Maintenance Plan for the REDOX Facility (DOE/RL-98-19). Final disposition to be addressed using CERCLA remedial action. Completion schedules to be established with RI/FS Work Plans and RD/RA Work Plans in accordance with Action Plan Section 11.6. (M-85 milestones)
<b>Production Reactor Buildings</b>	
105-B	S&M performed in accordance with Surveillance And Maintenance Plan For 105-B Reactor Facility (DOE/RL-2001-68). Because the reactor was designated a National Historic Landmark in August 2008, further management and disposition to be addressed in accordance with Nation Park Service requirements. No further CERCLA response action is anticipated.
105-C	In Interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan For 105-C Reactor Safe Storage Enclosure (DOE/RL-98-44). Final disposition to be determined (M-93 milestones).
105-D	In Interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan For 105-D Reactor Safe Storage Enclosure (DOE/RL-2004-59). Final disposition to be determined (M-93 milestones).
105-DR	In Interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan For 105-DR Reactor Safe Storage Enclosure (DOE/RL-2002-28). Final disposition to be determined (M-93 milestones).
105-F	In Interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan For 105-F Reactor Safe Storage Enclosure (DOE/RL-2003-45). Final disposition to be determined (M-93 milestones).
105-H	In Interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan For 105-H Reactor Safe Storage Enclosure (DOE/RL-2005-67). Final disposition to be determined (M-93 milestones).
105-KE 105-KW	To be dispositioned in accordance with Removal Action Work Plan for 105-KE/KW Reactor Facilities and Ancillary Facilities (DOE/RL-2005-26). Completion schedules to be established in accordance with Action Plan Section 11.6. (M-93 milestones)
105/109-N	In Interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan for the 105-N/109-N Reactor Safe Storage Enclosure (DOE/RL-2011-06). Final disposition to be determined (M-93 milestones).
<b>Others</b>	
PFP (234-5Z and 236Z)	Demolition of above ground structures in accordance with Non-Time Critical Removal Action Memorandum for PFP Above Ground Structures (DOE/RL-2005-13). Completion schedules have been established in accordance with Action Plan Section 11.6. (M-83 milestones)

Table 8-1. Status of “Key Facilities” as of March 2010

Facility	Status
<b>Others (continued)</b>	
FFTF	S&M being performed in accordance with Surveillance and Maintenance Plan for the Fast Flux Test Facility (DOE/RL-2009-26) in accordance with milestone M-081-00A.
UO3 Plant	<p>Deactivated in accordance with PUREX/UO3 Deactivation Project Management Plan (WHC-SP-1011D).</p> <p>Disposition in progress in accordance with Action Memorandum for Non-Time Critical Removal Action For U-Plant Ancillary Facilities (DOE/RL-2004-67) and U Plant Ancillary Facilities Removal Action Work Plan (DOE/RL-2004-83).</p> <p>Completion schedules have been established in accordance with U Plant Ancillary Facilities Removal Action Work Plan (DOE/RL-2004-83).</p>

### 8.1.3 Disposition of Other Facilities

Other facilities that the parties agree are subject to Section 8.0 will be dispositioned in accordance with the provisions of this section and any milestones established specific to those facilities. If there is a conflict between the provisions of this section and of a specific milestone, the provisions of the milestone will prevail. This section does not apply to the following:

- RCRA treatment or storage units either fully closed or scheduled for closure under Section 6.0 that result in the final disposition of the facility.
- Any facility which is fully addressed as part of a past practice operable unit under Section 7.0 of this action plan (i.e., N-area pilot project).

Additional facilities will be identified by the parties for CERCLA response actions on a case by case basis, using the following general criteria:

- Facilities that do not fall into any of the categories summarized in the bullets above,
- Facilities that will undergo a surveillance and maintenance period greater than 180 days with hazardous substances to be left in place,
- Facilities where either physical closure actions or waste unit remediation must be performed in conjunction with facility disposition, and/or
- Central Plateau facilities identified during the graded approach (Facility Evaluation) identified and incorporated into Appendix J of the Action Plan.

Facilities on the Central Plateau will be characterized to determine the hazards and risks. A Facility Evaluation, described in Section 8.1.4 will be completed for these facilities to determine how the graded approach will be applied. The Facility Evaluation will place a facility into one of the following tiers:

- **Tier 1 facilities** are facilities historically designated as “Key” (Section 8.1.2) or other complex facilities that played a major role in Hanford’s primary mission activities related to nuclear materials. Tier 1 facilities are generally large heavily shielded metal and concrete structures containing tanks, heavily shielded gloveboxes or hot cells, underground vaults, piping etc. that are integral to the facility structure which pose a threat of release of hazardous substances to the environment during disposition. Tier 1 facilities will be dispositioned under CERCLA as either a remedial action or a removal action, coordinated with closure of RCRA TSD units as needed.
- **Tier 2 facilities** are facilities not identified as Tier 1 that require a CERCLA response action. The disposition of Tier 2 facilities will be coordinated with closure of RCRA TSD units as needed.
- **Other facilities** not designated as Tier 1 or Tier 2. These facilities do not have a release or substantial threat of release of hazardous substances and will be dispositioned through the appropriate DOE processes.

#### 8.1.4 Disposition Documentation

Documentation required to authorize implementation of the disposition phase activities: a) will be prepared in accordance with the provisions of Section 7.0 and the joint Policy on Decommissioning of Department of Energy Facilities under CERCLA, and b) will be prepared in accordance with Section 6.0 for any necessary RCRA TSD closure plans. The decision documents (e.g., Action Memoranda, Records of Decision, or Closure Plans) will be issued by the lead agency in accordance with Sections 6.0 or 7.0. Completion Schedules will be developed in accordance with the requirements of Section 11.6.

The Facility Evaluation is prepared to evaluate each facility in regards to a graded approach to identify facilities subject to removal or remedial action under CERCLA. Facilities are placed in Tier 1 or Tier 2 based on their past history of releases or substantial threat of release. DOE will conduct the Facility Evaluation process for the Central Plateau facilities. A lead regulatory agency will be identified in Appendix J corresponding with the lead regulatory agency for operable units located in the same geographic area as the facility, unless otherwise agreed to by EPA and Ecology. The lead regulatory agency’s concurrence with the designation of facilities as Tier 1 or Tier 2, and the selection of response action for Tier 1 facilities, will be obtained by approval of a change to the Tri-Party Agreement Appendix J to be completed in accordance with Tri-Party Agreement Section 12.0, Changes to the Agreement. The designation will be based on the Facility Evaluation document and other documents or inspection as appropriate. The Facility Evaluation documents supporting Tier 1 or Tier 2 designations will be processed as secondary documents as defined in Action Plan Section 9, Documentation and Records.

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