



Maintenance of the Waste Information Data System (WIDS).




IAMIT Representative
U.S. Department of Energy
Richland Operations Office



IAMIT Representative
Environmental Protection Agency



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U.S. Department of Energy
Office of River Protection



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1.0 PURPOSE

The purpose of this procedure is to establish a mechanism for documenting the life-cycle of waste management units, other areas of concern, and locations subject to environmental cleanup/closure requirements on the Hanford Site, Richland, WA. The Waste Information Data System (WIDS) is used to track Hanford Site locations that have been evaluated to determine if they require cleanup or closure and waste sites that have already been cleaned up or closed. This procedure establishes responsibilities and the process required to maintain and update waste site information contained in WIDS and for updating Appendix C of the *Hanford Federal Facility Agreement and Consent Order Action Plan*, based on the changes made in the WIDS. The Hanford Federal Facility Agreement and Consent Order (HFFACO) is commonly known as the Tri-Party Agreement (TPA). The TPA Action Plan, Section 3.5 designates WIDS as the official database for documenting the current status of each unit.

The life-cycle of a waste management unit includes initial identification and documentation of the waste site, updates to waste site information, recording waste site cleanup activities, and close-out documentation. The process supports ongoing scoping activity discussed in Section 3.5 and Section 7.2.1 of the TPA Action Plan.

1.1 DEFINITIONS

Definitions with a listed source are quoted verbatim from that source. Definitions without a listed source are original to this procedure.

Accepted: A classification status indicating an assessment has been made that a WIDS site is a waste management unit.

Accepted (Proposed): A temporary classification status indicating a WIDS site has been recommended to be classified as 'Accepted' by the WIDS Analyst and WIDS Regulatory Subject Matter Expert (SME) but the approval process has not been completed.

Administrative Record: The administrative record is the body of documents and information that is considered or relied upon in arriving at a final decision for a remedial action, interim response action (i.e., removal action), corrective measure, interim measure, *Resource Conservation and Recovery Act (RCRA) of 1976* permit, or approved RCRA closure plan. (Source: Tri-Party Agreement Action Plan, Appendix A)

Areas of Concern: Any area of a Facility where a release of dangerous waste or dangerous constituents has occurred, is occurring, is suspected to have occurred, or threatens to occur. (Source: Hanford Facility RCRA Permit, *Definitions*)

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund: The federal statute enacted in 1980 and reauthorized in 1988 <http://prcdev.rl.gov/widl/6>, which provides the statutory authority for cleanup of hazardous substances that could endanger public health or welfare or the environment. (Source: Tri-Party Agreement Action Plan, Appendix A)

CERCLA Past Practice (CPP): A process by which a past practice unit containing hazardous substances will be addressed for response action (as opposed to RCRA past practice). (Source: Tri-Party Agreement Action Plan, Appendix A)

CERCLA Remedial Action: Remedial action means those actions consistent with permanent remedy taken instead of, or in addition to, removal action in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release of hazardous substances so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment. (Source: 40 CFR 300.5, *Definitions*)

CERCLA Removal Action: Removal action means the cleanup or removal of released hazardous substances from the environment, such actions as may be necessary taken in the event of the threat of release of hazardous substances into the environment, such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material, or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from a release or threat of release. (Source: 40 CFR 300.5, *Definitions*)

Classification: A process for assessing whether a WIDS site is a waste management unit as defined in the Tri-Party Agreement Action Plan, Section 3.1. The assessment is performed using the Discovery Site Evaluation Checklist (Figure 2). Classification statuses are Discovery, Accepted, Accepted (Proposed), Not Accepted, and Not Accepted (Proposed).

Closed Out: A reclassification status indicating, due to actions taken, a waste management unit meets applicable cleanup standards, closure requirements, or that a final remedy is operational and functional.

Closure Plan: A RCRA document that contains the plan to close a Treatment, Storage, and/or Disposal (TSD) unit in accordance with WAC 173-303 and the Hanford Facility RCRA Permit.

Consolidated: A reclassification status indicating a WIDS site is a duplicate of, physically located within, or adjacent to another WIDS site and will be dispositioned as part of that other WIDS site. NOTE: A

consolidated WIDS site requires no future updates in WIDS after reclassification. All updates may be limited to the WIDS site with which it was consolidated.

Deleted From National Priorities List (NPL): A status indicating the waste management unit is deleted from the NPL or included in a final action published in the Federal Register to delete a listing from the NPL. NOTE: This term was a reclassification status in TPA-MP-14 Revs 0 and 1, but is now stored as a separate status in WIDS.

Discovery: An initial classification status indicating evidence of a potential waste site; assessment not yet complete. This is the classification of a newly discovered WIDS site.

Discovery Site Evaluation Checklist: A checklist used to evaluate a WIDS site to determine its classification and unit category (Figure 2).

DOE Federal Project Director: The DOE Federal Project Director is the person responsible and accountable for executing the project. This includes meeting cost, schedule and performance targets. The DOE Federal Project Director leads the project team and provides broad program guidance. A list of responsibilities for the DOE Federal Project Director is contained in DOE ORDER 413.3A Section 6.g. The DOE Federal Project Director is responsible for classification and reclassification decisions for WIDS sites; this responsibility can be delegated by letter to a DOE Project Manager (as defined in the Tri-Party Agreement Action Plan).

Engineered Controls: Method of managing environmental and health risks by placing a barrier between contamination and the rest of the site, thus limiting exposure pathways. (Source: US Environmental Protection Agency (EPA), Terms of Environment: Glossary, Abbreviation and Acronyms, USEPA Web Page, <http://www.epa.gov/OCEPAterms/>)

Final: A reclassification category indicating that the site has been fully dispositioned and that no further reclassification is needed (e.g. a site closed out to the standards of a final Record of Decision).

Inert Waste - Solid wastes that meet the criteria for inert waste in WAC 173-350-990. (WAC 173-350-100, Solid Waste Handling Standards: Definitions)

Inert Waste Landfill - A landfill that receives only inert wastes. (WAC 173-350-100, Solid Waste Handling Standards: Definitions)

Inactive Contaminated Structures: Permanent, man-made features including buildings, concrete piers and supports, foundations and slabs, diversion boxes, control structures, tanks, flush pits, outfalls, pump stations, reactors, stacks, sumps, and valve pits that have no current or planned future use and have surfaces contaminated with hazardous substances or have hazardous substances remaining within them. Inactive contaminated structures do not include waste disposal facilities such as cribs, ponds, ditches, burial grounds, landfills, and French drains. NOTE: This definition was used in TPA-MP-14 Rev 0 and 1 as part of the basis for the Discovery Site Evaluation Checklist.

Institutional Controls (ICs): Non-engineered instruments, such as administrative and legal controls, that help to minimize the potential for human exposure to contamination and/or protect the integrity of a response action. They are typically used in conjunction with, or as a supplement to, other measures, such as waste treatment or containment. There are generally four categories of ICs: governmental controls;

proprietary controls; enforcement and permit tools with IC components; and information devices. (Source: EPA-540-R-09-001 November 2010 Interim Final, *Institutional Controls: A Guide to Planning, Implementing, Maintaining, and Enforcing Institutional Controls at Contaminated Sites*)

Interagency Management Integration Team (IAMIT): A committee of the Executive Managers from each agency [U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency (EPA), Region 10, and the Washington State Department of Ecology (Ecology)] with the functions of negotiation of new milestones, adjustment of scope and schedule of existing interim milestones, and Tri-Party Agreement Action Plan, Issue Resolution/Dispute Resolution. The IAMIT also serves as the interface with the Hanford Advisory Board (HAB). (Source: Tri-Party Agreement, Article VIII)

Interim Closed Out: A historical reclassification status indicating, due to actions taken, a waste management unit meets cleanup standards specified in an Interim Action Record of Decision or Action Memorandum, but for which a Final Record of Decision has not been issued. This reclassification status is no longer used. An “Interim” reclassification category and a “Closed Out” reclassification status are used instead.

Interim: A reclassification category indicating that the reclassification is based upon cleanup standards specified in an interim decision document (e.g. an Interim Record of Decision). A site with an interim reclassification will need a final reclassification to be fully dispositioned.

Landfill - A disposal facility or part of a facility at which solid waste is permanently placed in or on land including facilities that use solid waste as a component of fill. (WAC 173-350-100, Solid Waste Handling Standards: Definitions)

Lead Regulatory Agency: The agency (EPA or Ecology) which is assigned regulatory oversight responsibility with respect to actions under the Tri-Party Agreement Action Plan, regarding a particular operable unit, TSD group/unit, or milestone pursuant to Section 5.6 of the Tri-Party Agreement Action Plan. The designation of a Lead Regulatory Agency shall not change jurisdictional authorities of the parties. (Source: Tri-Party Agreement Action Plan, Appendix A)

Limited Purpose Landfill - A landfill which is not regulated or permitted by other state or federal environmental regulations that receives solid wastes limited by type or source. Limited purpose landfills include, but are not limited to, landfills that receive segregated industrial solid waste, construction, demolition and landclearing debris, wood waste, ash (other than special incinerator ash), and dredged material. Limited purpose landfills do not include inert waste landfills, municipal solid waste landfills regulated under chapter 173-351 WAC, Criteria for municipal solid waste landfills, landfills disposing of special incinerator ash regulated under chapter 173-306 WAC, Special incinerator ash management standards, landfills regulated under chapter 173-303 WAC, Dangerous waste regulations, or chemical waste landfills used for the disposal of polychlorinated biphenyls (PCBs) regulated under Title 40 CFR Part 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions. (WAC 173-350-100, Solid Waste Handling Standards: Definitions)

National Priorities List: EPA’s list of priority waste sites containing hazardous substances that will be investigated and cleaned up under the Superfund program. (Source: Tri-Party Agreement Action Plan, Appendix A)

No Action: A reclassification status indicating a waste site does not require remedial action under RCRA Corrective Action, CERCLA, or other cleanup standards based on an assessment of quantitative data collected for the waste site.

Not Accepted: A classification status indicating an assessment has been made that a WIDS site is not a waste management unit.

Not Accepted (Proposed): A temporary classification status indicating a WIDS site has been recommended to be classified as 'Not Accepted' by the WIDS Analyst and WIDS Regulatory SME but the approval process has not been completed.

None: A reclassification status indicating that a site has not been reclassified or that a reclassification has been cancelled based on new information.

Operation & Maintenance (O&M): The term means measures required to maintain the effectiveness of response action (Source: 40 CFR 300.5). For the purpose of this document, O&M activities may include surveillance, maintenance, and monitoring, such as groundwater monitoring requirements.

Operable Unit: A discrete portion of the Hanford Site, as identified in Section 3.3 of the Tri-Party Agreement, Action Plan. An operable unit is a group of land disposal sites placed together for the purposes of doing a Remedial Investigation/Feasibility Study (RI/FS) and subsequent cleanup actions. The primary criteria for placement of a site into an operable unit includes geographic proximity, similarity of waste characteristics and site type, and the possibility for economies of scale. (Source: Tri-Party Agreement Action Plan, Appendix A). NOTE: The term operable unit can also be applied to areas of groundwater contamination. The groundwater operable units are not within the scope of WIDS.

Other Storage Areas: Areas used to store materials not permitted under RCRA. Only those "other storage areas" that may require action to mitigate a potential environmental impact are eligible as waste management units per the Tri-Party Agreement Action Plan. NOTE: This definition was used in TPA-MP-14 Rev 0 and 1 as part of the basis for the Discovery Site Evaluation Checklist.

Postclosure: A RCRA term for the care needed after the TSD unit closure plan has been implemented when there is still waste left in place per WAC 173-303-610(7).

Preliminary Assessment and Site Inspection (PA/SI): Normally, the first step in analyzing the nature and severity of contamination at a potential CERCLA site and is used to determine if a site should be nominated for the NPL. Based upon extensive documentation previously submitted to EPA by DOE, this requirement is considered to have been satisfied for the Hanford Site. (Source: Tri-Party Agreement Action Plan, Appendix A)

Project Manager: The individual responsible for implementing the terms and conditions of the Tri Party Agreement at the specific operable unit level on behalf of his/her respective agency. The Project Manager has direct responsibility for completion of targets and milestones and has authority to agree to modifications of scope and schedule, in accordance with Section 12.0 of the Tri-Party Agreement Action Plan. (Source: Tri-Party Agreement Action Plan, Appendix A)

Resource Conservation and Recovery Act (RCRA): 42 U.S.C. Sec. 6901 et seq., as amended. For purposes of this Agreement [the Tri-Party Agreement], "RCRA" also includes the HWMA Ch. 70.105

RCW. (A federal law enacted in 1976 that regulates the generation, transportation, treatment, storage, and disposal of hazardous wastes). (Source: Tri-Party Agreement Action Plan, Appendix A)

RCRA/CERCLA Coordination: The coordination of RCRA corrective action and RCRA TSD unit closure with CERCLA remedial actions.

RCRA-CERCLA Past Practice (R-CPP): A process by which a past practice unit containing hazardous wastes or hazardous constituents and hazardous substances will be addressed for RCRA corrective action and CERCLA Cleanup, regardless of the date waste was received or discharged at a unit. (Source: Tri-Party Agreement Action Plan, Appendix A)

RCRA Closure: Closure means the requirements placed upon all TSD facilities to ensure that all such facilities are closed in an acceptable manner. (Source: WAC 173-303-040)

RCRA Facility Assessment (RFA): The initial RCRA process to determine whether corrective action for a RCRA past practice unit (waste management unit) is warranted, or to define what additional data must be gathered to make this determination; analogous to a CERCLA Preliminary Assessment and Site Inspection. (Source: Tri-Party Agreement Action Plan, Appendix A)

RCRA Past Practice (RPP): A process by which an inactive past practice waste management unit containing hazardous wastes or hazardous constituents will be addressed for corrective action, regardless of the date waste was received or discharged at a unit. This applies only to units not subject to regulation as a TSD unit. (Source: Tri-Party Agreement Action Plan, Appendix A).

RCRA Postclosure: A reclassification status indicating that the TSD unit has been closed with waste in place and that postclosure care, monitoring and institutional controls are being implemented.

Reclassification: The process whereby the status of an accepted waste management unit is changed in WIDS. Reclassification occurs when sufficient data have been received to disposition the unit. Reclassification statuses are Rejected, No Action, Closed Out, Consolidated, RCRA Postclosure and None. Reclassification could require regulatory agency review and concurrence. Reclassification overrides the classification status of the waste management unit.

Reclassification Initiator: A person who initiates the reclassification process for a waste management unit.

Rejected: A reclassification status indicating a waste site does not require remediation under RCRA Corrective Action, CERCLA, or other cleanup standards based on qualitative information such as a review of historical records, photographs, drawings, walkdowns, ground penetrating radar scans, and shallow test pits. Such investigations do not normally include quantitative measurements.

Solid Waste Management Unit (SWMU): Any discernible location at the Facility where solid wastes have been placed at any time, irrespective of whether the location was intended for the management of solid or dangerous waste, and includes any area at the Facility at which solid wastes have been routinely and systematically released (for example through spills), and includes dangerous waste treatment, storage, and disposal units. (Source: Hanford Facility RCRA Permit, WA 7890008967).

Subsite: Part of a waste site. Subsites are administrative division of a waste site into parts. Subsites are not included in the Appendix C of the Action Plan. All subsites must be reclassified in order for the final reclassification of the parent site and deletion from the NPL to occur.

TPA Configuration Control Project Manager: The person within the Tri-Party Agreement administrative organization who is responsible for ensuring that the TPA is maintained under configuration control and that all changes to the TPA are traceable to an approved TPA Change Request.

Treatment, Storage, or Disposal (TSD) Group: A grouping of TSD units for the purpose of preparing and submitting a permit application and/or closure plan pursuant to the requirements under RCRA, as determined in the Tri-Party Agreement Action Plan. (Source: Tri-Party Agreement Action Plan, Appendix A)

Treatment, Storage, or Disposal (TSD) Unit: A unit used for treatment, storage, or disposal of hazardous waste and is required to be permitted and/or closed pursuant to RCRA requirements as determined in the Tri-Party Agreement Action Plan. (Source: Tri-Party Agreement Action Plan, Appendix A)

Underground Injection Control (UIC) Well - A well that is used to discharge fluids into the subsurface. A UIC well is one of the following: (1) A bored, drilled or driven shaft, or dug hole whose depth is greater than the largest surface dimension; (2) an improved sinkhole; or (3) a subsurface fluid distribution system. (WAC 173-218-030, Underground Injection Control Program: Definitions)

Unit Category: A category determining the process by which a waste management unit is addressed for corrective action and/or closure (e.g. RCRA TSD, CERCLA Remedial/Removal Action, Septic).

Waste Disposal Unit: Units either permitted for disposal of dangerous waste or other units used for disposal including burial grounds, pits, ponds, ditches, cribs, trenches, French drains, or land surface units that might require action to mitigate a potential environmental impact. NOTE: This definition was used in TPA-MP-14 Rev 0 and 1 as part of the basis for the Discovery Site Evaluation Checklist.

Waste Information Data System (WIDS): The WIDS is the electronic database of waste site information for the Hanford Site. (Source: Tri-Party Agreement Action Plan, Section 3.5)

Waste Management Area: An area comprised of several waste sites that are generally within or immediately adjacent to a tank farm. Sites within a waste management area that meet the definition to be considered part of a TSD or a RCRA Past Practices site are grouped within the waste management area for the purposes of performing a RCRA Closure or Corrective Action, as appropriate. The primary criteria for placement of a site into a waste management area is to facilitate closure and remedial actions of sites that are in close geographic proximity to each other, have similar waste characteristics and can be closed under a common regulatory process. By organizing waste sites within a waste management area opportunities for economies of scale can be achieved in the closure process.

Waste Management Unit: Any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact.

Waste Management Unit Report: A report required by the Tri-Party Agreement Action Plan, Section 3.5. The report is generated in January of each year and posted electronically for regulator and public access. It reflects all changes made in waste management unit status during the previous year. The report is titled

Hanford Site Waste Management Units Report and is issued as sequential revisions to document number DOE/RL-88-30.

Waste Site: A waste management unit. For the purposes of this procedure, the terms “waste site” and “waste management unit” are synonymous.

Waste Site Controls: The term means controls or restrictions placed on a waste site after removal or remediation actions are pending or complete. The controls include engineering controls, institutional controls, monitoring requirements, surveillance & maintenance (S&M) requirements, and operation and maintenance (O&M) requirements.

WIDS Administrator: Individual responsible for the maintenance and management of WIDS.

WIDS Analyst: A person who performs WIDS site investigations, compiles information concerning WIDS sites, enters information into the database, and/or prepares the Discovery Site Evaluation Checklist. The WIDS Administrator determines what roles a WIDS Analyst is qualified to perform.

Waste Site Reclassification Form: The form used to document changes in waste site reclassification status (Figure 3).

WIDS Regulatory SME: An environmental regulatory subject matter expert, selected by the WIDS Administrator, who reviews and concurs with the Discovery Site Evaluation Checklist and provides additional regulatory support for the WIDS when needed. This subject matter expert is cognizant in CERCLA, RCRA and other applicable regulations.

WIDS Site: Any listing in the WIDS regardless of classification or reclassification status.

2.0 SCOPE

This procedure defines the 'WIDS change control system' as required by the TPA Action Plan, Section 3.5. The WIDS identifies waste management units on the Hanford Site and summarizes information associated with each unit. In addition, the WIDS also documents locations evaluated and determined not to be waste management units. These locations are not deleted, but are kept in the WIDS to document institutional memory.

The WIDS does not document:

- Groundwater contamination plumes and associated groundwater operable units;
- One time spills on the Hanford Site that have been mitigated within 90 days the discovery of of the spill;
- Radioactive contamination spread by biological vectors (e.g. rabbits, tumbleweeds) if removed within 90 days of identification;
- Discharges that are allowed by a State Waste Discharge permit that are not discharged to an engineered structure;
- Surface piles of debris that can be removed and disposed under WAC 173-350 (e.g., certain wood waste, and metal);

- 90-day accumulation areas and Satellite Accumulation Areas (the generator requirements in WAC 173-303-200 require these locations meet the closure performance standards of WAC 173-303-610 when use of the area is discontinued);
- Buildings/facilities which do not contain a TSD unit.

Some facilities (e.g. 202-A, 221-B, 221-U, and 202-S) are listed in WIDS because they have been assigned to an operable unit in Appendix C of the TPA Action Plan. As buildings/facilities are demolished and there is reason to suspect or evidence to show that there has been a release to the soil then a new discovery site will be added to WIDS for the contaminated soil.

3.0 RESPONSIBILITIES

This section describes responsibilities for organizations and personnel identified in this procedure. Responsibilities for some personnel are identified in Section 1.1 and are not repeated in this section.

3.1 ALL HANFORD SITE CONTRACTORS AND PERSONNEL

The DOE shall require all Hanford Site contractors to notify the WIDS Administrator concerning new potential WIDS sites, new information concerning existing WIDS sites, and changes to the status of WIDS sites within 60 days. Notifications can be through the WIDS hotline at 375-WIDS, an E-Mail message to ^WIDS Investigation Team, or submitted via plant mail. Non-Hanford Site personnel can either call the WIDS hotline or notify DOE of new potential WIDS sites or new information concerning existing WIDS sites. Notification of WIDS site changes also can be submitted to WIDS by providing documents, such as field investigation, characterization, or remediation reports, to a WIDS Analyst.

3.2 TRI-PARTY MEMBERS

The U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Department of Energy Office of River Protection (DOE-ORP), Environmental Protection Agency (EPA), and/or the Washington State Department of Ecology (Ecology) are responsible for reviewing the waste site classification and reclassification forms and responding appropriately as required by this procedure.

3.3 WIDS ADMINISTRATOR

The WIDS Administrator is responsible for ensuring the WIDS is properly maintained. This is achieved by establishing internal procedures for accepting information concerning new WIDS sites and updates to existing WIDS sites, and for ensuring changes to the database are complete, accurate, and within the established database criteria. The internal procedures shall require that all information be traceable to a referenced source. Data files for each WIDS site will be maintained physically in a secured location or electronically in an approved record storage system.

The WIDS Administrator is also responsible for ensuring the waste management report, as required by TPA Action Plan, Section 3.5, is generated as an end of year report and posted online by the end of February for regulator and public access. The WIDS administrator is also responsible for preparing the monthly report described in Section 5.4.1.

3.4 WIDS ANALYST

The WIDS Analyst is responsible for compiling information about waste sites and entering the information into the WIDS database. The WIDS Analyst also prepares the Discovery Site Evaluation Checklist.

3.5 WIDS REGULATORY SME

The WIDS Regulatory SME (subject matter expert) reviews and concurs with the Discovery Site Evaluation Checklist and provides additional regulatory support for the WIDS when needed. This subject matter expert is cognizant in CERCLA, RCRA and other applicable regulations.

4.0 REQUIREMENTS

This section describes requirements related to this procedure that are contained in the TPA Action Plan and the Hanford Facility RCRA Permit.

4.1 NOTIFICATION

Permit Condition II.Y.3.b of the Dangerous Waste portion of the Hanford Facility RCRA Permit states:

“Newly Identified Solid Waste Management Units and Newly Identified Releases of Dangerous Waste or Dangerous Constituents.

The Permittee must notify Ecology of all newly-identified solid waste management units and all newly-identified areas of concern at the Facility. For purposes of this condition, a ‘newly-identified’ solid waste management unit or a ‘newly-identified’ area of concern is a unit or area not identified in the HFFACO, as amended, on the effective date of this condition and not identified by Condition II.Y.3.a. Notification to Ecology must be in writing and must include, for each newly-identified unit or area, the information required by WAC 173-303-806(4)(a)(xxiii) and WAC 173-303-806(4)(a)(xxiv). Notification to Ecology must occur at least once every calendar year, in January, and must include all units and areas newly identified since the last notification, except that if a newly identified unit or area may present an imminent and substantial endangerment to human health or the environment, notification must occur within five (5) days of identification of the unit or area. If information required by WAC 173-303-806(4)(a)(xxiii) or WAC 173-303-806(4)(a)(xxiv) is already included in the Waste Information Data System, it may be incorporated by reference into the required notification.”

The TPA Action Plan, Section 3.5, addresses notification of new WIDS sites by establishing the WIDS database as the official system to identify all Hanford Site waste management units.

4.2 DATA ACCESS

The TPA Action Plan, Section 9.6.2, requires Ecology and EPA be granted access to all data that is relevant to work performed, or to be performed, under the agreement. DOE/RL-93-69, *Tri-Party Agreement Databases, Access Mechanism and Procedures*, describes the method for regulators to obtain access to the database.

4.3 SCOPING ACTIVITIES

Article XIV, Paragraph 49, of the Tri-Party Agreement sets the requirement for a RCRA Facility Assessment (RFA). The RFA process is analogous to the Preliminary Assessment/Site Investigation (PA/SI) stage of the CERCLA program [40 Code of Federal Regulations (CFR) 300.420]. The RFA and PA/SI identify solid waste management units and areas of concern requiring further action and eliminating solid waste management units, environmental media, or entire facilities from further consideration when it is determined there is no evidence of a release or likelihood of a release posing a threat to human health and the environment.

Section 7.2.1 of the TPA Action Plan, addresses sitewide scoping activities. The RFA & PA/SI processes have been completed for the Hanford Site, although continuing activities could lead to the discovery of additional WIDS sites or new information impacting either the designation of individual units within operable units or the priority in which operable units are managed. Section 7.2.1 refers to WIDS as the primary vehicle to document this ongoing activity. The waste site evaluation process and waste site reclassification are documented in WIDS.

5.0 PROCEDURE

This section describes procedural steps for adding, updating, classifying and reclassifying sites and subsites documented in the WIDS.

5.1 IDENTIFICATION OF A NEW WIDS SITE OR NEW INFORMATION

- | | |
|--------------|---|
| Originator | 1. If discovers a potential new WIDS site or has new information about an existing WIDS site, submits new information to a WIDS Analyst. A form is provided to facilitate preparation of the submittal (Figure 1). |
| WIDS Analyst | 2. Receives new information and evaluates to determine whether the site is already documented in the WIDS and if the information appears accurate. If concerns are identified, contacts the originator to determine a resolution.

3. If the information is related to an existing WIDS site: <ul style="list-style-type: none"> • Updates WIDS site information following the internal WIDS procedures • Prepares updated Discovery Site Evaluation Checklist if needed • Notifies the originator that the information has been entered. 4. If the information is not associated with any existing WIDS sites and is not in the list of items not within the scope of WIDS (see section 2): <ul style="list-style-type: none"> • Adds the site as a new entry to the database assigning it a |

unique name

- Sets the site classification to Discovery
 - Sets the site reclassification to None
 - Researches and documents the WIDS site following the internal WIDS procedures
 - Prepares the Discovery Site Evaluation Checklist (Figure 2)
 - Notifies the originator that the information has been entered. Also notifies the facility owner, remediation project lead, and/or any other appropriate personnel whose work scope might be affected by the new site.
5. If a Discovery Site Evaluation Checklist has been created or revised, continue to section 5.2.

5.1.1 CREATION OF SUBSITES

A waste site can be divided into subsites if it serves a useful administrative purpose. The decision to divide into subsites is at the discretion of DOE and the lead regulatory agency. If subsites are created, there should be no components of the site that are not accounted for within a subsite (the parts should add up to the whole). Subsites will use a standard naming convention of adding a colon and a sequential numbers to the sitecode. Example: Waste site 100-C-50 would have subsites 100-C-50:1, 100-C-50:2, etc.

Originator

1. Reviews waste site and proposed subsite information with DOE and Lead Regulatory Agency project managers and obtains concurrence for creating a subsite.
2. If agreed, submits subsite information to a WIDS Analyst. A form is provided to facilitate preparation of the submittal (Figure 1).

WIDS Analyst

3. Receives subsite information. If concerns are identified, contacts the originator to determine a resolution.
4. If the subsite information is verified to be accurate:
 - Adds subsite entries to the databases assigning them each a unique name. Sets the subsite classification to the same status as the original waste site. Sets the subsite reclassification to the same status as the original waste site.
 - Researches and documents the subsites following the internal WIDS procedures
 - Notifies the originator that the information has been entered. Also notifies the facility owner, remediation project lead, and/or any other appropriate personnel whose work scope might be affected by the new subsites.

5.2 CLASSIFICATION OF WASTE SITES

Table 1 provides a list of classification statuses.

NOTE: This procedure contains a very formal process for obtaining review and approval of Discovery Checklists that involves transmitting the forms by letter. At their discretion, the Federal Project Director and Project Managers can choose to use a different review process such as a review meeting or to exchange the forms without a letter. However, the 30 day review period is only valid if the reclassification forms are transmitted by letter.

WIDS Analyst	1. Prepares and signs the Discovery Site Evaluation Checklist. Submits the checklist to the WIDS Regulatory SME for review.
WIDS Regulatory SME	2. Reviews the checklist. <ul style="list-style-type: none"> • If concurs with the checklist, signs and returns to the WIDS Analyst • If disagrees with the checklist, returns to the WIDS Analyst with recommended changes marked on the form. Return to step #1.
WIDS Analyst	3. Sets classification for the site in WIDS as 'Accepted (Proposed)' or 'Not Accepted (Proposed)' based on the prepared checklist. Submits the checklist and supporting information to the DOE Federal Project Director
DOE Federal Project Director	4. Reviews the checklist and supporting information. <p>If agrees with classification, unit category, and operable unit/waste management area assignment:</p> <ul style="list-style-type: none"> • Signs in the DOE signature block • Transmits the checklist and supporting information by letter for review and approval. <p>If disagrees:</p> <ul style="list-style-type: none"> • Writes 'Not Approved' in the DOE signature block. Marks any additional changes onto the form • Returns the form to the WIDS Analyst. Go to Step #7.
Lead Regulatory Agency Project Manager	5. Reviews the checklist and supporting information. The Lead Regulatory Agency Project Manager has 45 days to complete the review and respond. <p>If agrees with classification, unit category, and operable</p>

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unit/waste management area assignment:

- Signs in the appropriate signature space
- Returns the form and supporting information to the DOE Federal Project Director.

If disagrees

- Writes 'Not Approved' in the DOE signature block. Marks any additional changes onto the form
- The form, supporting information, and a written response justifying the decision must be transmitted via letter to the DOE Federal Project Director.

If the Lead Regulatory Agency Project Manager does not respond within 45 days, the classification will be considered in dispute. Go to section 5.4.

DOE Federal Project Director

6. Returns the checklist and supporting information to the WIDS Analyst.

WIDS Analyst

7. If the checklist was approved, sets the classification and Unit Category to match the approved form. Submits a copy of the approved checklist to the Administrative Record.
 - If the checklist was not approved, modify the checklist based on information provided. Go to Section 5.2 Step #1.
8. If approved, send checklist to WIDS Administrator.

5.3 RECLASSIFICATION OF WASTE SITES

Table 2 provides a list of reclassification categories and statuses.

Table 3 provides a list of reclassification choices for the different unit categories.

NOTE: This procedure contains a very formal process for obtaining review and approval of Reclassification Forms that involves transmitting the forms by letter. At their discretion, the Federal Project Director and Project Managers can choose to use a different review process such as a review meeting or to exchange the forms without a letter. However, the 30 day review period is only valid if the reclassification forms are transmitted by letter.

Reclassification Initiator

1. Reviews the reclassification definitions in Table 3 to determine if a reclassification is appropriate.
2. Obtains permission from the contractor responsible for the waste site to initiate reclassification.

3. Prepares a reclassification form (Figure 3)
 - Obtains a Waste Site Reclassification Form control number from a WIDS Analyst
 - Fills out the reclassification form. The form shall list waste site controls including specific institutional controls, engineered controls, or monitoring requirements needed for the waste site (refer to the specific Record of Decision or other relevant documents)
 - Attaches supporting documentation (Table 3)
4. Submits a copy of the reclassification form to the responsible contractor for review. Incorporates comments.
5. Submits the reclassification form and supporting documentation to the DOE Federal Project Director.
- DOE Federal Project Director 6. Reviews the reclassification form, supporting information, and approval requirements listed in Table 3.

If concurs with reclassification:

- Signs in the DOE signature block.
- If no other approvals are required for the reclassification, returns the form and supporting information to the Reclassification Initiator. Go to Step #9.
- If approval of the Lead Regulatory Agency Project Manager is needed, transmits the reclassification form and supporting information by letter for review and approval.

If disagrees with the reclassification:

- Writes 'Not Approved' in the DOE signature block.
- Returns the form and supporting information to the Reclassification Initiator. Go to Step #9.

Lead Regulatory Agency
Project Manager

7. Reviews the reclassification form and supporting information. The Lead Regulatory Agency Project Manager has 45 days to complete the review and respond.

If agrees with the reclassification:

- Signs in the appropriate signature space
- Returns the form and supporting information to the DOE Federal Project Director.

If disagrees with the reclassification:

- Writes 'Not Approved' in the appropriate signature block.
- The form, supporting information, and a written response justifying the decision must be transmitted via letter to the DOE Federal Project Director.

If the Lead Regulatory Agency Project Manager does not respond within 45 days, the reclassification will be considered in dispute. Go to section 5.4.

DOE Federal Project Director

8. Reviews the returned reclassification form.

If approved by Lead Regulatory Agency, submits a copy of approved form and supporting information to the Reclassification Initiator and to a WIDS Analyst

If not approved by Lead Regulatory Agency, evaluates justification provided by Lead Regulatory Agency Project Manager.

- If agrees with justification, provides a copy of the “Not Approved” form to the Reclassification Initiator and to a WIDS Analyst
- If disagrees with justification, initiates dispute resolution. Go to section 5.4.

WIDS Analyst

9. Reviews the returned reclassification form.

If approved:

- Sets the reclassification status of the waste site to match the form
- Sets the status of the form to “Approved”
- Uses form and supporting information to updates the WIDS. Enter waste site controls listed on the reclassification form into appropriate data fields
- Ensures that a copy of the approved reclassification form and supporting information has been submitted to the Administrative Record.

If not approved:

- Ensures that the current reclassification status remains the same
- Ensures that a copy of the “Not Approved” reclassification form and supporting information is in the WIDS file.

5.3.1 RECLASSIFICATION OF SUBSITES

Reclassification of subsites follows the same process as the reclassification of waste sites described in section 5.3 with the following additional steps.

WIDS Analyst

1. If a waste site with subsites is reclassified, the reclassification status for the site and each of the subsites will be set to match the status indicated on the reclassification form.
2. If all subsites for a waste site are reclassified, contacts the contractor responsible for the site and confirms that the entire site has been addressed and that there are no outstanding components that should be listed as additional subsites.

If the entire site has been addressed, sets the reclassification status for the site. The reclassification status is determined based on the reclassification statuses for the subsites. The most conservative of the reclassification statuses will be used for the site reclassification status. For CERCLA Remedial/Removal Action, the statuses from most to least conservative are: Closed Out, No Action. For RCRA TSD's, the statuses from most to least conservative are: RCRA Postclosure, Closed Out. The date for the site reclassification will be set to the date the last subsite was reclassified.

5.3.2 CANCELLING A RECLASSIFICATION

If new information is obtained that indicates that a site was reclassified in error, a reclassification form should be prepared to set the reclassification status to "None". The form should follow the reclassification review process outlined in section 5.3.

5.4 DISPUTE RESOLUTION

Dispute resolution will follow the process within the Tri-Party Agreement. See Article VIII for dispute between DOE and Ecology. See Article XVI for dispute between DOE and EPA.

5.5 REPORTING

This section describes the reporting requirements for the WIDS.

5.5.1 MONTHLY STATUS REPORT

The monthly status report contains general statistics for the WIDS, a tracking list for items needing review and/or approval, and any other WIDS items that the WIDS Administrator believes would be of interest to the report's audience.

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- WIDS Administrator
1. Prepares the status report. The report shall include the following information:
 - Summary statistics for the WIDS.
 - A list of all sites classified as 'Accepted (Proposed)' or 'Not Accepted (Proposed)' and the date submitted for review.
 - Any other useful status information.
 2. Sends out the status report by E-mail to DOE Federal Project Directors, DOE Project Managers, EPA Project Managers, Ecology Project Managers, and contractor staff that are responsible for activities associated with WIDS sites.

5.5.2 HANFORD SITE WASTE MANAGEMENT UNITS REPORT

The Hanford Site Waste Management Units Report (HSWMUR) is generated annually based on the data in the WIDS, as required by the TPA Action Plan, Section 3.5. Because of its size, the report is not issued as a printed document, but instead is posted online for regulator and public access. The report must be generated as an end of calendar year report and posted on-line by the end of February. The report can be found at (<http://www.hanford.gov/page.cfm/TriParty>).

- WIDS Administrator
1. Prepares the HSWMUR report.
 2. Obtains clearance to release the document.
 3. Provides an electronic copy of the report to the Webmaster to post on-line.
 4. Prepares and sends a notification letter to DOE stating the report has been completed and posted.
 5. Prints one copy of the report and submits it to the Administrative Record.

5.3 UPDATING AND MAINTAINING APPENDIX C OF THE TPA ACTION PLAN

Appendix C of the TPA Action Plan is a listing of all WIDS sites that have been or will be addressed under Section 7 of the TPA Action Plan. This includes all waste sites addressed as part of a source operable unit. Appendix C contains the following information:

- Waste Management Unit Name
- Waste Management Unit Aliases
- Waste Management Unit Type
- Operable Unit
- Lead Regulatory Agency
- Unit Category

In addition, Appendix C provides a status for each waste site. For waste sites not reclassified, the status lists the decision document (e.g., Record of Decision, Action Memorandum) if one exists. For waste sites that are reclassified, the status lists the type of reclassification and date reclassification was approved.

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The TPA Change Control procedure is described in Section 12 of the TPA Action Plan. A simplified description of the change process for the Appendix C is described below.

- | | |
|---|--|
| WIDS Administrator | <ol style="list-style-type: none"> 1. At the end of each quarter, prepares a list of changes to the Appendix C. This includes: <ul style="list-style-type: none"> • New additions to the appendix. New sites classified as Accepted that have been assigned to an operable unit. • Site removed from the appendix. Listed sites that are classified as “Not Accepted” or reclassified as “Rejected” or “Consolidated” • Updates to site information including newly issued decision documents, reclassified sites, and other miscellaneous changes (change in unit type, correction of typographical errors, new aliases, etc). <p style="margin-left: 40px;">Submits information to the TPA Configuration Control Project Manager.</p> |
| TPA Configuration Control Project Manager | <ol style="list-style-type: none"> 2. Assigns a TPA Change Control number. Prepares TPA Change Request including markup of affected sections of the Appendix C. Submits TPA Change Request for approval. |
| DOE, EPA, and Ecology Executive Managers | <ol style="list-style-type: none"> 3. Review and approve the TPA Change Request. |
| TPA Configuration Control Project Manager | <ol style="list-style-type: none"> 4. Incorporates changes approved by the TPA Change Request into the TPA. |
| WIDS Administrator | <ol style="list-style-type: none"> 5. Updates WIDS to reflect any new operable unit assignments. |

6.0 REFERENCES

Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq.

DOE/RL-2001-41, *Sitewide Institutional Controls Plan For Hanford CERCLA Response Actions*, as revised.

Hanford Facility Resource Conservation and Recovery Act Permit, WA7890008967, as amended.

Hanford Federal Facility Agreement and Consent Order, 89-10, as amended.

Resource Conservation and Recovery Act of 1976, as amended, Public Law 94-580, 90 Stat. 2745, 42 U.S.C. 6901, et seq.

Washington Administrative Code 173-303, 2005, "Dangerous Waste Regulations", as amended.

Table 1. Classification Statuses

Classification Status	Description
Accepted	A classification status indicating an assessment has been made that a WIDS site is a waste management unit.
Accepted (Proposed)	A temporary classification status indicating a WIDS site has been recommended to be classified as 'Accepted' by the WIDS Analyst and WIDS Regulatory Subject Matter Expert (SME) but the approval process has not been completed.
Discovery	An initial classification status indicating evidence of a potential waste site; assessment not yet complete. This is the classification of a newly discovered WIDS site.
Not Accepted	A classification status indicating an assessment has been made that a WIDS site is not a waste management unit.
Not Accepted (Proposed)	A temporary classification status indicating a WIDS site has been recommended to be classified as 'Not Accepted' by the WIDS Analyst and WIDS Regulatory SME but the approval process has not been completed.

Table 2. Reclassification Categories and Statuses

Reclassification Category	Description
Final	A reclassification category indicating that the site has been fully dispositioned and that no further reclassification is needed (e.g. a site closed out to the standards of a final Record of Decision).
Interim	A reclassification category indicating that the reclassification is based upon cleanup standards specified in an interim decision document (e.g. an Interim Record of Decision). A site with an interim reclassification will need a final reclassification to be fully dispositioned.

Reclassification Status	Description
Closed Out	A reclassification status indicating, due to actions taken, a waste management unit meets applicable cleanup standards, closure requirements, or that a final remedy is operational and functional.
Consolidated	A reclassification status indicating a WIDS site is a duplicate of, physically located within, or adjacent to another WIDS site and will be dispositioned as part of that other WIDS site.
No Action	A reclassification status indicating a waste site does not require remedial action under RCRA Corrective Action, CERCLA, or other cleanup standards based on an assessment of quantitative data collected for the waste site.
None	A reclassification status indicating that a site has not been reclassified or that a reclassification has been cancelled based on new information.
RCRA Postclosure	A reclassification status indicating that the TSD unit has been closed with waste in place and that postclosure care, monitoring and institutional controls are being implemented.
Rejected	A reclassification status indicating a waste site does not require remediation under RCRA Corrective Action, CERCLA, or other cleanup standards based on qualitative information such as a review of historical records, photographs, drawings, walkdowns, ground penetrating radar scans, and shallow test pits. Such investigations do not normally include quantitative measurements.

Table 3. Reclassification, Approvals, and Supporting Documentation

Unit Category	Reclass. Status Choices	Reclass. Category	Approval Signatures Required	Documentation Required
Tri-Party Agreement Authority				
CERCLA Remedial/Removal Action	Closed Out, No Action	Interim or Final	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form with attached documentation.
CERCLA Remedial/Removal Action	Rejected	Final	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form with attached documentation supporting a Rejected decision.
RCRA TSD or RCRA/CERCLA Coordination (TSD)	Closed Out	Final	DOE and Ecology	Waste Site Reclassification Form with Certification of TSD Closure Acceptance Letter or written concurrence for procedural closure signed by Ecology attached
RCRA TSD or RCRA/CERCLA Coordination (TSD)	RCRA Postclosure	Final	DOE and Ecology	Waste Site Reclassification form with attached documentation showing RCRA postclosure has begun.
RCRA TSD Related	Closed Out	Final	DOE and Ecology	Signed Waste Site Reclassification Form with attached documentation.
Non-Tri-Party Agreement Authority				
Petroleum UST	Closed Out	Final	DOE	Waste Site Reclassification Form with attached Ecology letter documenting the WAC 173-360 requirements have been met
Septic	Closed Out	Final	DOE	Signed Waste Site Reclassification Form documenting the WAC 246-272A or WAC 246-272B requirements have been met.
Underground Injection Control Well	Closed Out	Final	DOE	Signed Waste Site Reclassification Form documenting the WAC 173-218-120 requirements have been met.

Table 3. Reclassification, Approvals, and Supporting Documentation (Continued)

State Waste Discharge	Closed Out	Final	DOE and Ecology	Signed Waste Site Reclassification Form documenting that discharge to the site has ended and that the state waste discharge permit will be allowed to expire.
Solid Waste Landfill	Closed Out	Final	DOE	Signed Waste Site Reclassification Form with attached Certification of Closure Acceptance Letter signed by Ecology
Inert Waste or Limited Purpose Landfill	Closed Out	Final	DOE	Signed Waste Site Reclassification Form documenting the WAC 173-350-410 or WAC 173-350-400 requirements have been met.
Miscellaneous Restoration	Closed Out	Final	DOE	Signed Waste Site Reclassification Form
Administrative				
All	Consolidated	Final	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form that documents the waste site will be consolidated with another WIDS entry.
All	None	Interim or Final	DOE and Lead Regulatory Agency	Signed reclassification form indicating that a previous reclassification status needs to be removed.

Figure 1. WIDS Site Information Form (A-6003-585).

WIDS SITE INFORMATION FORM		
Submitted by: _____	Telephone: _____	Date: _____
1. What is the WIDS Site Code/Name? _____ (NOT KNOWN <input type="checkbox"/>)		
2. For Existing WIDS Sites: What is the new information? Describe the change (include dates, dimensions, and radiation/safety postings).		
3. For documenting a New Site: What has been identified (i.e., hazardous material, radiological contamination, TSD unit, buildings)? Describe the site (include dates, dimensions, and radiation/safety postings)		
3a. Describe the site location. Be as specific as possible and include a location sketch.		
4. Documentation attached (include any available documentation; i.e. photographs, radiation surveys, log book pages, occurrence reports, memos, or other reference documents.)		

NOTE: A WIDS Analyst will review the information submitted and will notify the submitter and potentially responsible organization if a new site code assigned. Future reports, memos, radiation surveys, etc. should include the new site code.

Mail to: WIDS (see official site form for mailstop), E-mail to ^WIDS Investigation Team or call 375-WIDS.

Figure 2. Discovery Site Evaluation Checklist.

Discovery Site Evaluation Checklist (Page 1 of 2)			
1.	WIDS Site Code/Subsite Code: _____		
2.	Prepared and Reviewed by:		
	_____	_____	_____
	WIDS Analyst (print)	Signature	Date
	_____	_____	_____
	WIDS Regulatory SME (print)	Signature	Date
3.	Comment:		
4.	Is the site a Solid Waste Management Unit? Any discernible location at the Facility where solid wastes have been placed at any time, irrespective of whether the location was intended for the management of solid or dangerous waste, and includes any area at the Facility at which solid wastes have been routinely and systematically released (for example through spills), and includes dangerous waste treatment, storage, and disposal units.		Yes <input type="checkbox"/> No <input type="checkbox"/>
5.	Does the site need to be addressed under a regulatory program? Check first item that applies.		
	General Description (see TPA-MP-14 for definitions)	Unit Category	Classification
	Site specifically exempted from WIDS based on section 2.0 of TPA-MP-14	Not Applicable	Not Accepted
	Permitted RCRA TSD that will be addressed under a RCRA/CERCLA Coordination	RCRA/CERCLA Coordination TSD	Accepted
	Permitted RCRA TSD	RCRA TSD	Accepted
	Waste site that will be addressed as part of the closure of a RCRA TSD	RCRA TSD Related	Accepted
	Waste disposal unit or unplanned release unit where radioactive or dangerous waste is present or possibly present	CERCLA Remedial/Removal Action	Accepted
	Inert waste or limited purpose landfill (WAC 173-350-410 or WAC 173-350-400)	Inert Waste or Limited Purpose Landfill	Accepted
	Solid waste landfill (WAC 173-350)	Solid Waste Landfill	Accepted

Figure 2. Discovery Site Evaluation Checklist (Continued)

Discovery Site Evaluation Checklist (Page 2 of 2)			
General Description	Unit Category	Classification	Check Here
Petroleum UST or contaminated soil from a petroleum UST leak (WAC-173-360)	Petroleum UST	Accepted	
Underground injection well that received noncontaminated effluent (e.g. stormwater runoff, steam condensate, air conditioner condensate) (WAC 173-218)	Underground Injection Control Well	Accepted	
Other liquid disposal site with a state waste discharge permit. (WAC 173-216)	State Waste Discharge	Accepted	
Septic system for which there is no expectation of radioactive or dangerous waste discharge (WAC 246-272A or WAC 246-272B)	Septic	Accepted	
6. Assign the site to an operable unit or waste management area. Write 'Not Applicable' if neither applies.			
7. Ecology and EPA Approvals:			
_____	Signature		Date
Ecology Project Manager (print)			
_____	Signature		Date
EPA Project Manager (print)			
8. Are any other activities needed or desired at the site? Only answer if no items in question 5 were checked. Check first item that applies.			
General Description	Unit Category	Classification	Check Here
A location where remediation is not needed, but debris removal or other miscellaneous restoration activities may be performed	Miscellaneous Restoration	Accepted	
A location where no remediation, miscellaneous restoration, permit closure or other physical (e.g. waste site remediation) or administrative (e.g. permit closure) activity is needed	Not Applicable	Not Accepted	
9. DOE Approval:			
_____	Signature		Date
DOE Federal Project Director (Print)			

Figure 3. Waste Site Reclassification Form

Waste Site Reclassification Form (Page 1 of 2)	
Operable Unit:	Control No.:
Waste Site Code(s)/Subsite Code(s):	
Reclassification Category: Interim <input type="checkbox"/> Final <input type="checkbox"/>	
Reclassification Status: Closed Out <input type="checkbox"/> No Action <input type="checkbox"/> Rejected <input type="checkbox"/> RCRA Postclosure <input type="checkbox"/> Consolidated <input type="checkbox"/> None <input type="checkbox"/>	
Approvals Needed: DOE <input type="checkbox"/> Ecology <input type="checkbox"/> EPA <input type="checkbox"/>	
<u>Description of current waste site condition:</u> (What is the current physical state of the site? What activities have been performed?)	
<u>Basis for reclassification:</u> (How does the site meet the reclassification status?)	

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Figure 3. Waste Site Reclassification Form (Continued)

Waste Site Reclassification Form (Page 2 of 2)		
Operable Unit:	Control No.:	
Waste Site Code(s)/Subsite Code(s):		
<u>Project Manager comments:</u>		
<p>Waste Site Controls: Engineered Controls: Yes <input type="checkbox"/> No <input type="checkbox"/> Institutional Controls: Yes <input type="checkbox"/> No <input type="checkbox"/> O&M requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> If any of the Waste Site Controls are checked Yes, specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents.</p>		
DOE Federal Project Director (printed)	Signature	Date
Ecology Project Manager (printed)	Signature	Date
EPA Project Manager (printed)	Signature	Date