



**FINAL APPROVAL PACKAGE
FOR
THE TENTATIVE AGREEMENT ON HANFORD FEDERAL
FACILITY AGREEMENT AND CONSENT ORDER REVISIONS
FOR CENTRAL PLATEAU CLEANUP**

U.S. Department of Energy
U.S. Environmental Protection Agency
Washington State Department of Ecology

May 2016

CONTENTS

Comments and Responses Document

1.	-	Comments and Responses to the Tentative Agreement on Hanford Federal Facility Agreement and Consent Order Revisions for Central Plateau Cleanup
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Final Change Control Forms

1.	M-15-16-01	Modification And Extension Of The M-015-00 Major Milestone “Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00”
2.	M-15-16-02	Addition To And Modification Of Ecology Lead Regulatory Agency Milestones Within The M-015 Series “Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00”
3.	M-15-16-03	Addition To And Modification Of EPA Lead Regulatory Agency Milestones Within The M-015 Series “Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00”
4.	M-16-16-02	Modification And Extension Of The M-016-00 Major Milestone “Complete Remedial Actions for all Non-Tank Farm and Non-Canyon Operable Units”
5.	M-16-16-03	Addition To And Modification Of Ecology Lead Regulatory Agency Milestones Within The M-016 Series “Complete Remedial Actions for all Non-Tank Farm and Non-Canyon Operable Units”
6.	M-16-16-04	Addition To And Modification Of EPA Lead Regulatory Agency Milestones Within The M-016 Series “Complete Remedial Actions for all Non-Tank Farm and Non-Canyon Operable Units”
7.	M-37-15-01	Extension For TPA Interim Milestone M-037-11 And Addition Of Interim Milestone to Complete Closure Requirements
8.	M-85-16-01	Extension Of Dual Lead Regulatory Agency TPA Milestone M-085-01
9.	M-85-16-02	Addition Of EPA Lead Regulatory Agency Interim Milestones For The M-085 Series
10.	M-85-16-03	Addition Of Ecology Lead Regulatory Agency Interim Milestones For The M-085 Series
11.	M-94-15-01	Modification Of Major Milestone M-094-00 To Exclude 324 Building And Ancillary Buildings

**COMMENTS AND RESPONSES
FOR
THE TENTATIVE AGREEMENT ON HANFORD FEDERAL
FACILITY AGREEMENT AND CONSENT ORDER REVISIONS
FOR CENTRAL PLATEAU CLEANUP**

In October 2015, the U.S. Department of Energy (DOE) Richland Operations Office (RL), the U.S. Environmental Protection Agency (EPA), and the Washington State Department of Ecology (Ecology), hereinafter referred to as the Tri-Party agencies, completed negotiations on revisions to the *Hanford Federal Facility Agreement and Consent Order*—also referred to as the Tri-Party Agreement (TPA). The TPA milestone (i.e., cleanup actions and schedules) changes were proposed for the following milestone series: M-015-00 (investigation work and documentation on the Central Plateau), M-016-00 (cleanup work on the Central Plateau), M-037-00 (closure for Resources Conservation and Recovery Act [RCRA] treatment, storage, and disposal units), M-085-00 (canyon cleanup), and M-094-00 (disposition of the 300 Area facilities). The proposed changes set new dates for completing work on the Central Plateau to allow for the work to be performed as expeditiously as possible and maintain a trained work force.

A formal comment period on the proposed change package was originally scheduled to run from October 26 through December 11, 2015, but was extended to February 12, 2016, per public request. More than 1,800 copies of the fact sheets were distributed by mail or sent electronically at the start of the public comment period.

During the public comment period, the Tri-Party agencies briefed the Tribal Nations, the State of Oregon, and the Hanford Advisory Board. The Tri-Party agencies also held several discussions with stakeholder groups to obtain input in planning the public meetings. On November 4, 17, 18, and 19, 2015, public meetings were held in the cities of Richland and Seattle, Washington, and the cities of Portland and Hood River, Oregon, with approximately 30 people attending each meeting. The purpose of the public meetings was to ensure that stakeholders had the information needed to give valuable, informed input, as well as advise the TPA agencies which cleanup work should be prioritized.

Over 1,500 comments were received from 8 stakeholder groups and hundreds of residents on the Central Plateau change packages. Nearly 1,500 of these comments were focused on 3 major topics:

- 1) **Prioritize demolition of the 324 building and cleanup of the radioactive waste site beneath it.** In response, the TPA agencies have established a new milestone for completing remote excavation of the highly radioactive portion of the waste site underneath the 324 building by September 30, 2019 (milestone M-016-85A). Since the public identified this work as one of their major priorities, the agencies wanted to provide the public with a specific milestone to highlight the progress and projected completion date for this work. Note: A milestone for completing the 324 building demolition already existed (M-016-85).
- 2) **Create enforceable milestones with explicit completion dates (i.e., set a date for the M-016-00 major milestone).** As part of the proposed changes provided to the public for comment, the TPA agencies set the M-016-00 major milestone due date to “To Be Determined.” M-016-00 is a schedule for completing remedial actions on the Central Plateau (excluding canyons and tank farms). The rationale for this decision was that the characterization efforts to investigate contamination and identify cleanup remedies have not been finalized (it takes place as part of the M-015-00 series milestones). Without this information the exact remedy for cleanup and the schedule for implementing the remedy

can only be projected. However, almost 500 public comments were received stating that the TPA agencies should estimate a completion date to the best of their knowledge for completing M-016-00. In response, the agencies have identified a specific milestone completion date of September 30, 2042.

- 3) **Protect Central Plateau groundwater by investigating whether radioactive waste from Hanford's unlined trenches (aka., 200-SW-2 landfills) are leaching.** In response to major public interest on this topic, the Parties have added a new milestone (M-015-93C) to clearly indicate the start date for investigating the 200-SW-2 landfills by September 30, 2018.

The remainder of the public comments focused on themes, such as prioritizing dry storage of WESF's cesium/strontium capsules, re-investigating the structural integrity of PUREX Storage tunnels, prioritizing M-015-00 and M-016-00 cleanup over U Plant demolition and cap, seeking full funding from Congress for cleanup, and ways to enhance public involvement during comment periods.

With regards to the proposed milestone M-037-12, Ecology, in consultation with EPA Region 10, prefers to set the closure dates for the NRDWL and 400 Area Treatment, Storage, Disposal Facilities (TSDFs) through a permitting process, rather than by setting a TPA milestone date. Therefore, the milestone M-037-12, which proposed closure dates for the NRDWL and 400 Area, was deleted from the approved milestones.

Below, the TPA agencies have issued responses to significant public comments. When multiple commenters raised the same or similar issues, the agencies summarized these comments and provided a single response. Copies of the original comments are in the Administrative Record and Public Information Repository located at 2440 Stevens Center Place, Room 1101, Richland, Washington, or through the following website address:

- Part 1: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0077206H>
- Part 2: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0077205H>
- Part 3: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0077204H>

I. Comments on Milestone Extensions, New Milestones, and Requested Prioritization of Milestones

A. Milestone Extensions

1. Pick a Date for M-016-00 Major Milestone

- **Comment:** Set a specific, achievable date for the M-016-00 major milestone instead of using “To Be Determined” as a place mark for a completion date. The goal should be to establish specific, achievable milestones within a process that allows for changing milestones when necessary [~500 comments].
- **Response:** The agencies have revised the M-16-00 milestone to include a specific date of September 30, 2042.

B. Requested Prioritization of Milestones

1. M-015/16 Series Milestones

- **Comment:** The majority of commenters on this topic recommended that the agencies prioritize the proposed milestones to reflect an acceleration of the M-015-00 and M-016-00 milestones series, which cover the investigation and remediation of non-tank farm/non-canyon waste sites located in the 200 Areas, ahead of M-085 work related to demolishing U Canyon and closing B Pond, S Pond, and NRDWL [~10 comments].
- **Response:** The agencies have revised the milestones to reflect the lower priority to demolish U Canyon and close B Pond and S Pond.

2. 324 Building and 300-296 Waste Site Underneath

- **Comment:** The majority of the comments called for prioritizing the cleanup of the 324 Building and initiating remediation of the plume beneath the Building [~500 comments].
- **Response:** The Tri-Parties have established a new milestone (M-016-85A) for the cleanup of the extremely high radiation area (requiring remote excavation) immediately under the building by September 30, 2019.

3. 618-11 Burial Ground Milestone

- **Comment:** In the tentative agreement, the parties proposed a new milestone, M-016-86, for completing remedial actions at the 618-11 burial ground by September 30, 2021. Commenters expressed a variety of opinions on how remediation of the 618-11 burial ground should be prioritized in comparison to other major cleanup efforts at the Hanford site. Those in favor of accelerating remediation at the 618-11 burial ground cited concerns with proximity to the river, a general interest in seeing this site remediated sooner, and previous extensions. Some stated the 2021 date was appropriate as is. Others felt that remediation of the 618-11 burial ground should be postponed in order to focus cleanup funds and resources on other prioritizes in the near-term, such as getting the Plutonium Finishing Plant to slab-on-grade; moving the cesium/strontium capsules at the

Waste Encapsulation Storage Facility (WESF) into dry storage; removal of all sludge from the K West basin; and remediation of the contaminated soil beneath the 324 Building [~10 comments of varying opinion].

- **Response:** The TPA agencies appreciate public feedback on this topic. Given the varied opinions on accelerating, delaying, and keeping the due date for remediation of the 618-11 burial ground, the decision has been made to keep the milestone as is.

4. Unlined Trenches / SW-2 Landfills

- **Comment:** A significant number of public comments requested that the TPA agencies investigate or start removing the radioactive waste stored in Hanford's unlined trenches in order to identify if contamination is moving deeper into soils, and if so, take steps to inhibit contaminants from eventually reaching groundwater [~500 comments].
- **Response:** In response to comments to investigate the burial grounds/unlined trenches in the 200-SW-2 operable unit, a new milestone (M-015-93C) has been added to initiate characterization of the radioactive solid waste burial grounds by September 30, 2018.

5. PUREX Storage Tunnel Structural Integrity

- **Comment:** Commenters advised the TPA agencies to expeditiously investigate whether the PUREX tunnels pose a high risk, and if so, to then negotiate milestones to begin planning for their remediation [~10 comments].
- **Response:** The agencies agree and have established a new milestone (M-085-80A) for submittal of data quality objectives report for assessing the structural integrity of PUREX storage tunnels 1 and 2 by September 30, 2017.

6. Accelerate M-091 Milestones

- **Comment:** The M-091 milestone series should be accelerated to account for delays and uncertainties that may jeopardize completing shipments to WIPP before its potential closure in 2030 [~5 comments].
- **Response:** Although the M-091 package was not part of this milestone series submitted for public comment, the M-091 milestone timelines for retrieving, treating, repackaging, and shipping waste to WIPP are based on how long these activities have taken in the past (at Hanford). Therefore, the milestones take into account the types of delays that have occurred in the past. The agencies believe that the schedule is aggressive but achievable.

7. Prioritize WESF; Cs/Sr Capsules

- **Comment:** Prioritize the transfer of WESF cesium and strontium capsules into dry storage. These capsules pose a very high risk. Proposed milestone changes should be adjusted accordingly to better reflect this higher priority [~10 comments].
- **Response:** Existing milestone M-092-05 due June 30, 2017 already reflects this priority. M-092-05 requires DOE to “Determine disposition path and establish interim Agreement Milestones for Hanford Site Cs/Sr capsules.”

C. Support for New Milestones

1. M-016-250

- **Comment:** Commenters supported the idea of the M-016-250 milestone, as it further defines remediation work being performed. Additional requests were made to expedite the milestone [~10 comments].
- **Response:** Per the milestone, a list of waste sites for implementing removal actions has been agreed to by Ecology and DOE-RL.

II. Comments on Budget and Funding

A. Seek Compliant Funding from Congress

- **Comment:** Seek adequate resources/funding from Congress for all proposed cleanup activities [~10 comments].
- **Response:** As part of the Federal budgeting process, DOE-RL will continue to identify and request the full funding required to comply with the TPA milestones that are due in the budgeting year.

B. Use a More Aggressive Funding Scenario

- **Comment:** Meet legal obligations by negotiating more stringent deadlines in an effort to demonstrate the priority of this work to Congress and drive adequate funding for Hanford cleanup [~10 comments].
- **Response:** The agencies' goal for these changes was to negotiate aggressive, achievable milestones that show steady progress. We did not base our negotiations on the assumption that future funding would be constrained to a flat funding level. We considered that the agencies were able to support greater amounts of work than present funding, as evidenced by performance during the period of the American Reinvestment and Recovery Act.

III. Comments on Public Involvement

A. More Time to Understand Information and Provide Comments

- **Comment:** Provide more lead time before scheduling public hearings. For future hearings, we urge the TPA agencies to provide a minimum of 30 days advance notice before scheduled hearings, in accordance with the Public Involvement Plan [~10 comments].
- **Response:** The TPA agencies took note of how many commenters asked for more lead time to understand proposed changes, as well as time to provide comments during public meetings. We will continue to make a concerted effort to notify stakeholders at least 30 days before the start of a public comment period or before a public meeting. In the case of this public comment period (and meetings), the agencies were trying to balance several factors, including the desire to hold the first meeting the same evening and location as the Hanford Advisory Board meeting to encourage more public and stakeholder participation, the desire to avoid scheduling regional meetings between Thanksgiving and the start of the new year, and the fact that agency negotiations on the milestones had taken longer than anticipated. Nevertheless, once the TPA agencies agree on a schedule for conducting public outreach about comment periods or public meetings, multiple efforts are then made to communicate the information. Methods of announcing public participation opportunities may include: social media postings, event postings on agency websites, advertisements in regional and local newspapers, public service announcements on radio and television, news releases, and notices in the Federal Register. Furthermore, people can access the TPA Public Involvement Calendar, available online at: http://www.ecy.wa.gov/programs/nwp/PI/pdf/TPA_PI_Calendar.pdf.

B. Better Collaboration with Stakeholders and the Hanford Advisory Board's Public Involvement and Communication Committee on the Development of Materials and Presentations

- **Comment:** Commentators asked for more collaboration between agencies and public interest groups. They also suggested improvements be made to the public review and comment process on proposed changes to the TPA or other important cleanup actions, which can be accomplished by working closely with the HAB's Public Involvement and Communication Committee on the development of materials and presentations describing change packages [~10 comments].
- **Response:** The TPA agencies appreciate the offer for more collaboration between the agencies and public interest groups. Furthermore, when possible, we will consider input on the design and content of notices from interested stakeholders in the area where a meeting or comment period will be held, as well as bring public involvement materials under development to the HAB's Public Involvement and Communications Committee

for feedback. We were responsive to early feedback about the coordinated materials for the Central Plateau Milestone Change Packages, and the agencies used the feedback to modify information materials for three subsequent meetings.

C. Schedule Meetings to Educate the Hanford Advisory Board and Public on Cleanup Planned for the Next Decade

- **Comment:** The TPA agencies should schedule meetings to educate the Hanford Advisory Board and the public on expectations for cleanup based on year-by-year goals and activities for the next decade and beyond [~5 comments].
- **Response:** The TPA agencies understand that early and meaningful public involvement opportunities for stakeholders, Tribal Nations, and others strengthens the decision-making process and results in sustainable solutions. This is one of the fundamental reasons why the Hanford Advisory Board was chartered. However, even with the active involvement of the Board, public involvement activities above and beyond legal requirements are still conducted because the agencies believe public participation is a key component of the decision-making process. These activities, and the timing for these activities vary based upon legal requirements, the scope of the proposed actions, and the values and priorities of our stakeholders, Tribal Nations, and others. In addition to these various activities, the agencies conduct an annual workshop focused on cleanup priorities and funding needs covering a multi-year period to provide information about planned actions, expected outcomes, and resource needs. In fact, the Office of Environmental Management's guidance on public involvement in the budget development process is largely modeled after the annual process conducted at Hanford. Given the tempo of these public involvement activities and the fact that Hanford cleanup is conducted in an environment where appropriations can vary annually, the agencies prefer to focus on the current, institutionalized process and the flexibility it provides to discuss and adjust priorities and planned actions, if necessary, based on appropriations levels. The agencies remain committed to this process and open and transparent decision making concerning Hanford cleanup.

D. Use Plain Language in Information Materials

- **Comment:** During future TPA change package comment periods, the TPA agencies should include supplemental plain language explanations of terminology used throughout the change package in their materials, especially references to buildings, facilities, and waste sites [~5 comments].
- **Response:** The agencies will continue to work together to develop public involvement materials that use plain language, especially when referencing buildings, facilities and waste sites. Fact sheets and briefings are created along with the change packages themselves, which serve as a basis for agreement amongst the agencies on specific actions, facilities, and sites. The agencies incorporate feedback received during public

comment periods on products developed (e.g., the briefing materials for proposed changes to the Central Plateau milestones), and we appreciated the public comments that contributed to improving those materials.

**FINAL CHANGE CONTROL FORMS
FOR
THE TENTATIVE AGREEMENT ON HANFORD FEDERAL
FACILITY AGREEMENT AND CONSENT ORDER REVISIONS
FOR CENTRAL PLATEAU CLEANUP**

Change Number M-15-16-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 05/12/2016
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Originator R. J. Corey	Phone 376-0108
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Modification And Extension Of The M-015-00 Major Milestone "Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00"

Description/Justification of Change

The change package includes:

- Modification and extension of major milestone M-015-00 by 9 ½ years

These changes align with the revised and reprioritized milestones developed through negotiations.

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-015-00 <u>Lead Regulatory Agency: Dual</u>	Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00. A day for day slip in submitting the feasibility study report and proposed plan milestone will be given for each day the RI/FS work plan is not approved following six months after submittal.	12/31/2016 <u>06/30/2026</u>

Impact of Change
Modification and extension of the M-015-00 major milestone for submittal of M-015 series decision documents.

Affected Documents

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).

Approvals		Page 1 of 1
S. Charboneau DOE	<i>Stacy Charboneau</i> 05/18/2016 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
D. McLerran EPA	<i>D. McLerran</i> 5/25/16 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
M. Bellon Ecology	<i>Mara Bellon</i> 5/20/16 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	

Change Number M-15-16-02	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 05/12/2016
Originator R. J. Corey		Phone 376-0108
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Addition To And Modification Of Ecology Lead Regulatory Agency Milestones Within The M-015 Series "Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00"		
Description/Justification of Change The change package includes: <ul style="list-style-type: none"> • Addition of three interim milestones • Modification and extension of one interim milestone, and • Extension of four interim milestones These changes align with the revised and reprioritized milestones developed through negotiations. <i>Continued on page 2</i>		
Impact of Change Extension for several interim milestones within the M-015 series, and modification and creation of milestones for submittal of M-015 decision documents.		
Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).		
Approvals R.J. Corey  _____ <u>5/20/16</u> <input checked="" type="checkbox"/> Approved _____ Disapproved _____ DOE Date N/A _____ _____ Approved _____ Disapproved _____ EPA Date A.K. Smith  _____ <u>5/20/16</u> <input checked="" type="checkbox"/> Approved _____ Disapproved _____ Ecology Date		Page 1 of 2

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-015-21A Lead <u>Regulatory</u> Agency: Ecology	Submit a 200-BP-5 and 200-PO-1 OU Feasibility Study Report and Proposed Plan(s) to Ecology.	06/30/2015 <u>06/30/2018</u>
M-015-92A Lead <u>Regulatory</u> Agency: Ecology	Submit a RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study work plan for the 200-EA-1 operable unit (200 East Inner Area) to Ecology.	06/30/2015 <u>09/30/2017</u>
M-015-92B Lead <u>Regulatory</u> Agency: Ecology	Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report(s) and Proposed Corrective Action Decision(s)/Proposed Plan(s) for the 200-EA-1 and 200-IS-1 OUs (Central Plateau 200 East Inner Area) to Ecology.	12/31/2016 <u>11/30/2022</u>
<u>M-015-92C</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-IS-1 OU to Ecology.</u>	<u>03/31/2023</u>
M-015-93B Lead <u>Regulatory</u> Agency: Ecology	Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU to Ecology.	12/31/2016 <u>01/31/2023</u>
<u>M-015-93C</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Initiate characterization field work for the 200-SW-2 Operable Unit landfills in accordance with the schedule in the approved RI/FS/RFI/CMS Work Plan.</u>	<u>09/30/2018</u>
M-015-110B Lead <u>Regulatory</u> Agency: Ecology	Submit Corrective Measures Study & Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision for the 200-DV-1 OU to Ecology.	09/30/2015 <u>09/30/2023</u>
<u>M-015-96</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit the 100-OL-1 Remedial Investigation report and a change request to establish a date for the Feasibility Study report to Ecology.</u>	<u>08/31/2018</u>

Change Number M-15-16-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 05/12/2016
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Originator R. J. Corey	Phone 376-0108
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Addition To And Modification Of EPA Lead Regulatory Agency Milestones Within The M-015 Series
"Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for
canyon/associated past practice waste site OUs covered in M-85-00"

Description/Justification of Change

The change package includes:

- Addition of two interim milestones
- Modification and extension of one interim milestone, and
- Extension of one interim milestones

These changes align with the revised and reprioritized milestones developed through negotiations.

Continued on page 2

Impact of Change
Extension for one interim milestone within the M-015 series, and modification and creation of milestones for submittal of M-015 decision documents.

Affected Documents

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).

Approvals		Page 1 of 2
R.J. Corey DOE	 5/20/16 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date	
D.A. Faulk EPA	 5/23/16 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date	
N/A Ecology	_____ Date	_____ Approved <input type="checkbox"/> Disapproved

The Parties acknowledge that waste sites located within the boundaries of the U Plant barrier need to be investigated prior to construction of the barrier in accordance with the WA-1 RI/FS Work Plan. For waste sites located beneath the barrier that require remedial action to protect human health and the environment, the Parties will consider all available regulatory paths (e.g., Action Memorandum, or an early action) to complete the response actions before construction of the U Plant barrier.

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-015-38B Lead <u>Regulatory</u> Agency: EPA	Submit a revised Feasibility Study Report and revised Proposed Plan(s) for the 200-CW-1, 200-CW-3, and 200-OA-1 Operable Units for Waste Sites in the Outer Area of the Central Plateau to EPA.	Revised due date to be identified by <u>10/30/2015</u> <u>07/31/2023</u>
M-015-91B Lead <u>Regulatory</u> Agency: EPA	Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1/200-WA-1 operable units (200 West Inner Area) to EPA.	12/31/2015 <u>07/31/2021</u>
M-015-98 <u>Lead Regulatory</u> Agency: EPA	<u>Complete remedial investigation of U Plant related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan</u>	<u>06/30/2019</u>
M-015-99 <u>Lead Regulatory</u> Agency: EPA	<u>Complete remedial investigation of PFP related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan.</u>	<u>06/30/2019</u>

Change Number M-16-16-02	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 05/12/2016
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Originator R. J. Corey	Phone 376-0108
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Modification And Extension Of The M-016-00 Major Milestone "Complete Remedial Actions for all Non-Tank Farm and Non-Canyon Operable Units"

Description/Justification of Change

The change package includes:

- Modification and extension of major milestone M-016-00 by 18 years

These changes align with the revised and reprioritized milestones developed through negotiations.

Continued on Page 2.

Impact of Change
Modification and extension of the M-016-00 major milestone for completing remedial actions.

Affected Documents
The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).

Approvals		Page 1 of 2
S. Charboneau DOE	<i>Stacy Charboneau</i> Date <u>05/18/2016</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
D. McLerran EPA	<i>D. McLerran</i> Date <u>5/25/16</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
M. Bellon Ecology	<i>Maria D. Bellon</i> Date <u>5/20/16</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	

All work will be conducted pursuant to approved work plans in accordance with the HFFACO. The schedule for completion will reflect the scope and complexity of the selected remedial or corrective action.

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p>M-016-00 <u>Lead Regulatory Agency: Dual</u></p>	<p>Complete remedial actions for all non-tank farm and non-canyon operable units <u>in accordance with schedules established in approved RD/RA work plans.</u></p> <p>Note: See operable unit LRA designation listing in Appendix C. It is assumed that the Record of Decision will be signed 6 months after the public comment period closes on the proposed plan. Per Action Plan Section 11.6 a day-for-day slip in the RD/RA Work Plan due date will be given for each day the remedy decision is not issued past the 6 month date. The document review, comment and approval process prescribed in the Action Plan of the HFFACO Section 9 will be followed.</p> <p>The schedule for completion of the construction of the remedy will reflect the scope and complexity of the selected remedial action. The schedule for remedial action implementation will be established upon regulatory agency approval of the RD/RA Work Plans and is enforceable as a HFFACO requirement.</p>	<p>09/30/2024 <u>09/30/2042</u></p>

Change Number M-16-16-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 05/12/2016
Originator R. J. Corey		Phone 376-0108
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Addition To And Modification Of Ecology Lead Regulatory Agency Milestones Within The M-016 Series "Complete Remedial Actions for all Non-Tank Farm and Non-Canyon Operable Units"		
Description/Justification of Change <p>The change package includes:</p> <ul style="list-style-type: none"> • Addition of one interim milestone <p>These changes align with the revised and reprioritized milestones developed through negotiations.</p> <p><i>Continued on page 2</i></p>		
Impact of Change Addition of one interim milestone within the M-016 series, and separation of milestones for remedial actions.		
Affected Documents The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).		
Approvals R.J. Corey  _____ <u>5/20/16</u> <input checked="" type="checkbox"/> Approved _____ Disapproved DOE Date N/A _____ _____ Approved _____ Disapproved EPA Date A.K. Smith  _____ <u>5/20/16</u> <input checked="" type="checkbox"/> Approved _____ Disapproved Ecology Date		Page 1 of 2

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p><u>M-016-250</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u></p>	<p><u>Submit to Ecology for approval a three year rolling prioritized schedule consistent with site-wide clean-up priorities to implement waste site removal actions per Action Memoranda (DOE/RL-2009-37, DOE/RL-2009-48, and DOE/RL-2009-86).</u></p> <p><u>This milestone will continue on a yearly basis to reaffirm selected sites and recommend any changes to the list, to maintain a three year rolling prioritized schedule, until such time that removal actions are completed.</u></p>	<p><u>03/31/2016</u> <u>And Annually</u> <u>Thereafter</u></p>

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p>M-016-00B <u>Lead Regulatory Agency: EPA</u></p>	<p>Complete all interim 300 Area remedial actions including the 618-10 and 618-11-burial grounds, but not including <u>the 618-11 burial ground, 300-296, and</u> sites associated with retained 300 Area facilities and the utility corridors. Completion of interim remedial actions for waste sites associated with the retained 300 Area facilities and their utilities are subject to approved Remedial Design/Remedial Action Work Plans.</p> <p>Completion of all interim remedial actions is defined as the completion of the interim ROD requirements in accordance with an approved RD/RA Work Plan and obtain EPA approval of the appropriate project closeout documents. The disposition of impeding surplus facilities will be performed in accordance with Milestone M-094-00.</p>	<p>09/30/2018</p>
<p>M-016-85A <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete remote excavation of the 300-296 waste site in accordance with an approved RD/RA Work Plan.</u></p>	<p><u>09/30/2019</u></p>
<p>M-016-85 <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete remedial actions for the 300-296 waste site in accordance with RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1) and disposition for the 324 Building and Ancillary Buildings in accordance with the Removal Action Work Plan (DOE/RL-2004-77). Completion of facility disposition is defined as the completion of deactivation, decontamination, decommissioning, and demolition in accordance with the removal action work plan.</u></p>	<p><u>09/30/2021</u></p>
<p>M-016-86 <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete remedial actions for 618-11 Burial Ground in accordance with RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1).</u></p>	<p><u>09/30/2021</u></p>
<p>M-016-200A <u>Lead Regulatory Agency: EPA</u></p>	<p>Complete U Plant canyon (221 U Facility) demolition in accordance with the Remedial Design/Remedial Action Work Plan.</p>	<p>09/30/2017 <u>09/30/2024</u></p>
<p>M-016-200B <u>Lead Regulatory Agency: EPA</u></p>	<p>Complete U Plant (221 U Facility) barrier construction in accordance with the Remedial Design/Remedial Action Work Plan.</p>	<p>09/30/2021 <u>09/30/2027</u></p>

Change Number M-37-15-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 09/03/2015
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Originator R. J. Corey	Phone 376-0108
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Extension For TPA Interim Milestone M-037-11 And Addition Of Interim Milestone to Complete Closure Requirements

Description/Justification of Change

This change package includes:

- Modification of existing Milestone M-037-10 to remove 241-CX Tank System
- Extension of an interim milestone completing closure requirements for 216-B-3 Main Pond system and 216-S-10 Pond and Ditch by 8 years
- Addition of an interim to complete closure for the 241-CX Tank System

These changes align with the revised and reprioritized milestones developed through negotiations.

Continued on page 2

Impact of Change

This change package modifies existing milestone, extends the due date of M-037-11 by 8 years and adds one interim milestones to complete closure requirements.

Affected Documents

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).

Approvals		Page 1 of 2
R.J. Corey DOE	 _____ Date <u>5/20/16</u> <input checked="" type="checkbox"/> Approved _____ Disapproved	
N/A EPA	_____ <input checked="" type="checkbox"/> Approved _____ Disapproved Date	
A.K. Smith Ecology	 _____ Date <u>5/20/16</u> <input checked="" type="checkbox"/> Approved _____ Disapproved	

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-037-10 <u>Lead Regulatory Agency: Ecology</u>	Complete Unit-Specific Closure Requirements according to the closure plan(s) for <u>six (6)</u> seven (7) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, 216-B-63 Trench, <u>and Hexone Storage and Treatment Facility (276-S-141/142), and 241-CX Tank System (241-CX-70/71/72).</u>	09/30/2020
M-037-11 <u>Lead Regulatory Agency: Ecology</u>	Complete unit-specific closure requirements for two (2) TSD Units: 216-B-3 Main Pond system and 216-S-10 Pond and Ditch.	09/30/2016 <u>09/30/2024</u>
M-037-13 <u>Lead Regulatory Agency: Ecology</u>	<u>Complete Unit-Specific Closure Requirements according to the closure plan-241-CX Tank System (241-CX-70/71/72).</u>	<u>09/30/2022</u>

Change Number M-85-16-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 05/16/2016
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Originator R. J. Corey	Phone 376-0108
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Extension Of Dual Lead Regulatory Agency TPA Milestone M-085-01

Description/Justification of Change

The change package includes:

- Extension of four years to establish date for major milestone M-085-00

These changes align with the revised and reprioritized milestones developed through negotiations. Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-085-01 Lead <u>Regulatory</u> Agency: Dual	Submit a change package to establish a date for major milestone M-085-00 <u>consistent with schedules established in approved RD/RA work plans.</u>	09/30/2022 <u>06/30/2026</u>

Impact of Change
Extends the due date to establish the M-085-00 major milestone.

Affected Documents
The Hanford Federal Facility Agreement and Consent Order Appendix D and J, as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change control documents, project management plans).

Approvals		Page 1 of 1
R.J. Corey DOE	 5/20/16 X Approved _____ Disapproved _____ Date	
D.A. Faulk EPA	 5/23/16 ✓ Approved _____ Disapproved _____ Date	
A.K. Smith Ecology	 5/20/16 X Approved _____ Disapproved _____ Date	

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<u>M-085-90</u> <u>Lead Regulatory</u> <u>Agency: EPA</u>	<u>Submit Remedial Investigation/Feasibility Study Work Plan for 200-CR-1</u> <u>to EPA.</u>	<u>09/30/2021</u>
<u>M-085-100</u> <u>Lead Regulatory</u> <u>Agency: EPA</u>	<u>Submit to EPA a Removal Action Work Plan to implement the approved</u> <u>Action Memorandum for 224-T (DOE/RL-2004-68).</u>	<u>09/30/2020</u>

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<u>M-085-70</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit to Ecology a Remedial Investigation/Feasibility Study Work Plan for 200-CB-1.</u>	<u>09/30/2019</u>
<u>M-085-72</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit to Ecology as a primary document a Removal Action Work Plan to implement the approved Action Memorandum for 224-B (DOE/RL-2004-36).</u>	<u>09/30/2020</u>
<u>M-085-74</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit to Ecology for approval proposal(s) for expedited response action(s) for one or more of the Tier 1 and Tier 2 facilities in the B Plant Geographic Area listed in HFFACO Appendix J.</u> <u>A Remedial/Removal Action Work Plan, including schedule, shall be submitted to Ecology as a primary document 180 days after approval of the Action Memorandum or interim Record of Decision developed for the expedited response action, or an alternative period designated in the Action Memorandum or interim Record of Decision.</u>	<u>06/30/2018</u>
<u>M-085-76</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Initiate response actions for the B Plant Geographic Area in accordance with the schedule in the approved Remedial/Removal Action Work Plan developed under M-085-74.</u>	<u>09/30/2025</u>
<u>M-085-80A</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit to Ecology as a secondary document a data quality objectives report to assess the structural integrity of the PUREX storage tunnels 1 and 2.</u>	<u>09/30/2017</u>
<u>M-085-80</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit Remedial Investigation/Feasibility Study Work Plan for 200-CP-1 to Ecology.</u>	<u>09/30/2020</u>
<u>M-085-82</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Submit to Ecology for approval proposal(s) for expedited response action(s) for one or more of the Tier 1 and Tier 2 facilities in the PUREX Geographic Area listed in HFFACO Appendix J.</u> <u>A Remedial/Removal Action Work Plan, including schedule, shall be submitted to Ecology as a primary document 180 days after approval of the Action Memorandum or interim Record of Decision developed for the expedited response action, or an alternative period designated in the Action Memorandum or interim Record of Decision.</u>	<u>12/31/2017</u>
<u>M-085-84</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	<u>Initiate response actions for the Purex Geographic Area in accordance with the schedule in the approved Remedial/Removal Action Work Plan developed under M-085-82.</u>	<u>09/30/2025</u>

Change Number M-94-15-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 09/03/2015
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Originator R. J. Corey	Phone 376-0108
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Class of Change
 I - Signatories II - Executive Manager III - Project Manager

Change Title
Modification Of Major Milestone M-094-00 To Exclude 324 Building And Ancillary Buildings

Description/Justification of Change
This change package modifies major milestone M-094-00 to exclude the 324 Building and ancillary building and structures. This change aligns with the revised and reprioritized milestones developed through negotiations.
Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-094-00 Lead <u>Regulatory</u> Agency: EPA	Complete disposition of all 300 Area surplus facilities identified in the removal action work plan(s) for the 300 Area facilities, <u>including</u> excluding the 324 Building and its ancillary buildings and structures. Completion of facility disposition is defined as the completion of deactivation, decontamination, decommissioning, and demolition <u>in accordance with the removal action work plan, and obtaining EPA and/or Ecology approval of the appropriate project closeout documents. The cleanup of 300 FF-2 waste sites associated with 300 Area surplus facilities and utilities will be performed in accordance with Tri-Party Agreement major Milestone M-016-00B, M-016-69, and approved remedial design/remedial action work plans for 300 Area waste sites by the specified due date as approved in removal or remedial action work plans.</u>	09/30/2018

Impact of Change
Removes the 324 Building and ancillary building and structures that are being addressed by Removal Action Work Plan (DOE/RL-2004-77). This scope will be subject to the completion date in interim milestone M-016-85 (TPA Change Package M-16-16-04).

Affected Documents
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor baseline change Control documents, project management plans).

Approvals		Page 1 of 1
S. Charboneau DOE	<i>S. Charboneau</i> 05/18/2016 ✓ Approved _____ Disapproved _____ Date	
D. McLerran EPA	<i>D. McLerran</i> 5/25/16 ✓ Approved _____ Disapproved _____ Date	
M. Bellon Ecology	<i>M. Bellon</i> 5/20/16 ✓ Approved _____ Disapproved _____ Date	