



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

15-AMRP-0037
REISSUE

DEC 12 2014

Mr. D. A. Faulk, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

Dear Mr. Faulk:

REISSUE - NOTIFICATION OF HANFORD FEDERAL FACILITY AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-016-149, "COMPLETE 100-IU-2/6 INTERIM RESPONSE ACTIONS," DUE MARCH 31, 2015

The purpose of the reissue is to include a minor edit. This letter provides a Tri-Party Agreement milestone change request to modify the scope of the subject milestone for U.S. Environmental Protection Agency (EPA) approval. The change proposes to delete five waste sites from Milestone M-016-149 and include them in Milestone M-016-00A, "Complete all response actions for the 100 Areas Units," due March 31, 2017.

Consultation with the Tribal Nations as required in accordance with Section 106 of the National Historical Preservation Act of 1966 (16 U.S.C.470 et seq.) for remediation of waste sites 600-326, 600-329, 600-334:2, and 600-349 has significantly delayed start-up of remedial activities. In addition, the discovery of unanticipated anomalous materials at the 600-358 waste site including mercury containing equipment, beryllium, sealed canisters, tear gas, bottles with liquid, and opaque capped bottles have required adding special worker protection procedures resulting in significantly extending the remediation schedule beyond the milestone due date.

The U.S. Department of Energy Richland Operations Office (RL) will continue to keep EPA informed of progress on the project through quarterly milestone reviews and regulatory interface meetings. RL will continue to work closely with EPA on sampling, closure, backfill, and revegetation of 600-358 to complete this waste site as soon as practicable. Attached is a Draft Change Control Form M-16-13-04 to modify the scope of Tri-Party Agreement Interim Milestone M-016-149 to exclude the 600-326, 600-329, 600-334:2, 600-349, and 600-358 waste sites. These waste sites are proposed to be included in Tri-Party Agreement Milestone M-016-00A, which will include completion of all final action responses by March 31, 2017. Please note that 31 of the 36 waste sites identified in the M-016-149 Milestone, have been or will be completed through revegetation before the due date of March 31, 2015.

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If you have any questions, please contact me, or your staff may contact Mark French of my staff, at (509) 373-9863.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray J. Corey" with a stylized flourish at the end. To the right of the signature, the letters "FDR" are written in a smaller, blocky font.

Ray J. Corey, Assistant Manager
for the River and Plateau

AMRP:JPN

Attachment

cc w/attach:

G. Bohnee, NPT
J. V. Borghese, CHPRC
R. Buck, Wanapum
L. J. Cusak, CHPRC
C. J. Guzzetti, EPA
S. Harris, CTUIR
J. A. Hedges, Ecology
T. Q. Howell, WCH
S. Hudson, HAB
R. Jim, YN
R. A. Kaldor, MSA
R. A. Lobos, EPA
K. Niles, ODOE
R. E. Piippo, MSA
D. Rowland, YN
Administrative Record
Environmental Portal

DRAFT

Change Number M-16-13-04	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 12/8/2014
Originator Phone R. J. Corey (U. S. Department of Energy, Richland Operations Office [DOE]) (509) 376-0108		
Class of Change <input type="checkbox"/> I - Signatories Manager <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project		
Change Title Scope clarification of Tri-Party Agreement interim milestone M-016-149 to exclude the 600-326, 600-329, 600-334:2, 600-349, and 600-358 waste sites.		
Description/Justification of Change The scope of milestone M-016-149, "Complete 100-IU-2/6 interim response actions" includes completion of interim remedial actions for 36 waste sites in the 100 Area Remaining Sites Interim Action Record of Decision (1999). This change proposes exclusion of the following sites from interim remedial actions. 600-326, Odorous Black Material, 600-329, Concrete Outfall Structure, 600-334:2, Burn Area Near CMX Building, 600-349, Unexploded Ordnance (UXO) outside of 600-149, and 600-358, Scattered Waste Areas in the Vicinity of the Gable Mountain Firing Range. Consultation on effects of remedial actions with the affected Tribal Nations is required in accordance with Section 106 of the National Historical Preservation Act of 1966 (16 U.S.C. 470 et seq.). The extended duration of consultation process has caused significant delay in start-up of remedial activities for the waste sites 600-326, 600-329, 600-334:2, and 600-349 that will delay completion past the March 31, 2015 milestone due date. Discovery of anomalous items during remedial activities at the 600-358 waste site created extensive delays due to anomaly response, characterization, and work stoppages. Description/Justification of Change continued on next page.		
Impact of Change Establish that interim response actions for 600-326, 600-329, 600-334:2, 600-349, and 600-358 are not due under M-016-149. These waste sites will be addressed in the milestone M-016-00A, "Complete all response actions for the 100 Areas units by the specified due date as approved in a Remedial Design/Remedial Action Work Plan" which will include completion of final response actions for these waste sites.		
Affected Documents		

*Hanford Federal Facility Agreement and Consent Order, Appendix D
Remedial Design Report/Remedial Action Work Plan for the 100-N Area, DOE/RL-2005-93, Rev. 0*

Approvals		Page 1 of 2
DOE	12-12-14 ✓	Approved _____ Disapproved _____
EPA		Approved _____ Disapproved _____
Ecology	N/A	Approved _____ Disapproved _____

Change Form M-16-13-04
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Description/Justification of Change (continued):

Waste site 600-326 consists of two subsites located along the Columbia River in the Hanford Construction Camp. The waste appears to be black material in an area lacking vegetation. Waste site 600-329 consists of an unknown concrete structure underlying soils near the Construction Shop of the Hanford Townsite, on the high water line of the river. There have been several below-grade features identified on ground penetrating radar scans, consistent with buried debris. The subsite 600-334:2 is a burned area of unknown origin, near the northwest corner of the former CMX building complex, along the Columbia River just upstream of the Hanford Townsite. These waste sites (600-326, 600-329, & 600-334:2) are included in extended negotiations in accordance with Section 106 of the National Historical Preservation Act of 1966 (16 U.S.C. 470 et seq.) with the affected Tribal Nations due to the location of the sites near a culturally sensitive site.

Waste site 600-349 is an unexploded ordinance (UXO) area that extends from the perimeter of the firing range as far as a rifle grenade could travel. It is partially located on Gable Mountain, in the area with the highest potential to contain munitions and explosives. Because the waste site is located in the culturally sensitive area of Gable Mountain consultation with the affected tribal nations must occur prior to and during remediation.

Start-up of remediation at the four waste sites has been significantly delayed due to the need for additional consultation. With the extensive durations for these consultations remediation of these waste sites will extend beyond the milestone due date.

Waste site 600-358, Scattered Waste Areas in the vicinity of the Gable Mountain firing range. Remediation of this waste site began in July 2014; however, the site was found to contain numerous anomalous items including mercury containing equipment, beryllium, sealed canisters, tear gas, bottles with liquid, and opaque capped bottles requiring special worker protection procedures and extending the schedule beyond the milestone completion due date.

The M-016-149 milestone completion due date of March 31, 2015 is not achievable for these waste sites due to the extended cultural resource review durations and for the extended worker safety requirements.

Based on the technical challenges and cultural sensitivity of the area, DOE and EPA agree to remove the 600-326, 600-329, 600-334:2, 600-349, and 600-358 waste sites from the scope of TPA Milestone M-016-149 and include them in the scope of TPA Milestone M-016-00A.

Authorized Changes:

Hanford Federal Facility Agreement and Consent Order Interim Milestone is modified or created as shown below using ~~strikeout~~ to indicate text deletions and underlined to indicate text additions:

Milestone Number	Milestone Description	Completion Date
M-016-149 Lead Agency: EPA	Complete 100-IU-2/6 interim response actions for the following waste sites: 600-293, 600-294, 600-298, 600-299, 600-300, 600-301, 600-303, 600-305, 600-309, 600-310, 600-313, 600 316, 600-318, 600-319, 600-320, 600-321, 600-328, 600-329 , 600-331, 600-332, 600-334 , 600-326 , 600-349 , 600-358 , 600-368, 600-369, 600-370, 600-371, 600-372, 600-373, 600-374, 600-375, 600-376, 600-377, 600-378, 600-379.	03/31/2015
M-016-00A Lead Agency: Dual	Complete all response actions for the 100 Areas units (except groundwater actions which are covered under Major Milestone M-016-00 and 100 K Area response actions addressed in M-016-00C) by the specified due date as approved in a Remedial Design/Remedial Action Work Plan. Completion of response actions is defined as the completion of the ROD or action memorandum requirements in accordance with an approved RD/RA work plan or removal action work plan and EPA and/or Ecology approval of waste site reclassification forms.	03/31/2017