

<b>Change Number</b> M-15-09-02	<b>Federal Facility Agreement and Consent Order Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> September 14, 2010
------------------------------------	--	-----------------------------------

<b>Originator</b> Matthew S. McCormick	<b>Phone</b> (509) 373-9971
---	--------------------------------

<b>Class of Change</b> <input checked="" type="checkbox"/> I - Signatories	<input type="checkbox"/> II - Executive Manager	<input type="checkbox"/> III - Project Manager
---	---	--

**Change Title**  
 Modify Tri-Party Agreement M-15 series milestones for Central Plateau waste sites and groundwater.

**Description/Justification of Change**

In accordance with the February 2009 Agreement In Principle signed by the Tri-Parties, DOE developed a Central Plateau cleanup completion strategy for overall clean-up of the Central Plateau including non-tank farm waste site operable units, excess facilities and groundwater remediation. Following open discussion with Tribal Nations, the State of Oregon, the Hanford Advisory Board and other stakeholders, the Parties have proposed changes to the Tri-Party Agreement to implement the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA).

The changes to the Tri-Party Agreement establish milestones and revise existing milestones for site investigation of the Central Plateau based on geographic based operable units.

*Continued on page 2*

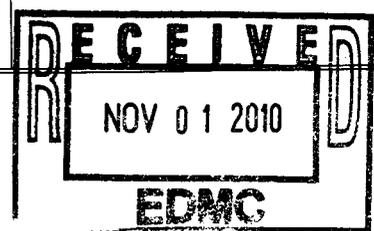
**Impact of Change**

Approval of this change package impacts the existing milestones for completing the remedial investigation/feasibility study (RI/FS) (RCRA Facility Investigation/Corrective Measures Study [RFI/CMS]) process and for developing and submitting proposed plans on the Central Plateau. Documents that were required by milestones deleted in this change package will not be completed, including proposed plans for the 200-MW-1 and 200-UW-1 Operable Units, as well as a revised feasibility study and proposed plan for the BC Cribs and Trenches (200-BC-1). The remainder of the RI/FS (RFI/CMS) process for these OUs and other Central Plateau OUs will be addressed in the new geographic-based OUs described in accompanying change package C-09-07. Existing RI/FS work plans for the 200-IS-1 and 200-SW-2 OUs will be revised in accordance with the new milestones.

**Affected Documents**

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning, management and budget documents (e.g., baseline control documents, related work authorization and directives). Specific affected work planning documents are described under *Impact of Change*. To maintain coordination between RCRA closure actions and CERCLA remedial actions, several milestones in this change package and in the M-37-10-01 change package coincide. In the event that changes are necessary to an affected milestone, both sets of milestones should be reviewed.

<b>Approvals</b>  DOE-RI	10/13/10 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
 DOE - OR	10/13/10 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
 EPA	10/20/10 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
cology	10/26/10 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved



200-MW-1  
 200-UW-1  
 M-015-00

## **Description/Justification of Change**

*Continued from page 1*

As work planning proceeds, additional milestones will be incorporated in accordance with Section 11.6 of the Tri-Party Agreement. Approval of this change package will result in the following changes to Appendix D of the Action Plan:

- Major milestone, M-015-00 is revised to exclude past practice waste sites associated with B Plant, PUREX, and REDOX canyons from the scope of the milestone. These sites are now covered in the newly created M-085 milestone series.
- The language deleted from the major milestone M-015-00 is deleted because the accompanying change package P-00-09-01 now provides for addressing past practice units designated as R-CPP units using both CERCLA and RCRA corrective action authority.
- Major milestone M-015-00C is now redundant with M-015-00 and is deleted. The completion date of major milestone M-015-00 coincides with the latest interim milestone in the M-015 series.
- Milestones for completion of the remedial investigation/feasibility study process for the geographically-based operable units are added to replace the previous process-based operable unit milestones.
- Milestone M-015-110A related to the RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) & Remedial Investigation/Feasibility Study (RI/FS) work plan for deep vadose zone specifically emphasizes the need for additional technology screening; technology screening is a necessary initial step in developing feasible alternatives that can be evaluated as part of the remedy selection process.
- Groundwater operable unit milestones are revised to incorporate changes agreed to by the parties.

The milestone changes described below have been developed in conjunction with Tri-Party Agreement change packages M-16-09-03 (waste site remediation), M-37-10-01 (Treatment Storage and Disposal unit closure), M-85-10-01 (canyons, associated waste sites, and other excess facilities), C-09-07 (operable unit assignments), J-09-01 (Central Plateau facilities), P-07-09-02 (Record of Decision [ROD] preparation), and L-09-01/P-00-09-01 (CAD/ROD implementation).

Changes to milestones are displayed by Double Underline to indicate addition of text and by ~~Strikeout~~ to indicate deletion of text.

Number	Milestone	Due Date
M-015-00	<p>Complete the RI/FS (or RFI/CMS <u>and RI/FS</u>) process for all <u>non-tank farm</u> operable units <u>except for canyon/associated past practice waste site OUs covered in M-85-00</u>. In instances where RCRA authority requires investigation of past practice units, Ecology agrees, pursuant to Ecology's Dangerous Waste Regulations, that DOE may satisfy the requirements for an RFI/CMS report by submitting an RI/FS report.</p> <p>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.</p>	<p>TBD</p> <p><u>12/31/2016</u></p>
<p>M-015-00C</p> <p>LEAD AGENCY:</p> <p>DUAL</p>	<p>Complete all 200 Area Non-Tank Farm operable unit site investigations under approved work plan schedules through submittal of feasibility study reports and a recommended remedy(ies). In instances where RCRA authority requires investigation of past practice units, Ecology agrees, pursuant to Ecology's Dangerous Waste Regulations, that DOE may satisfy the requirements for an RFI/CMS report by submitting an RI/FS report. The recommended remedy(ies) will be sufficiently comprehensive to satisfy the technical requirements of RCRA, Hazardous Waste Management Act (HWMA), and CERCLA statutory authorities and respective regulations with respect to all hazardous substances, pursuant to the HFFACO Article IV Paragraph 17 and Action Plan Section 5.4.</p>	<p>TBD</p>
<u>M-015-90</u>	<p><u>Submit revised RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) &amp; Remedial Investigation/Feasibility Study (RI/FS) work plan for 200-IS-1OU to Ecology.</u></p>	<p><u>06/30/2011</u></p>
<u>M-015-91A</u>	<p><u>Submit a Remedial Investigation/Feasibility Study work plan for the 200-WA-1 operable unit (200 West Inner Area) to EPA.</u></p>	<p><u>12/31/2011</u></p>
<u>M-015-91B</u>	<p><u>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.</u></p>	<p><u>06/30/2013</u></p>

Number	Milestone	Due Date
<u>M-015-92A</u>	<u>Submit a RCRA Facility Investigation/Corrective Measures Study &amp; Remedial Investigation/Feasibility Study work plan for the 200-EA-1 operable unit (200 East Inner Area) to Ecology.</u>	<u>12/31/2012</u>
<u>M-015-92B</u>	<u>Submit Corrective Measures Study &amp; 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.</u>	<u>06/30/2014</u>
<u>M-015-93A</u>	<u>Submit revised RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) &amp; Remedial Investigation/Feasibility Study (RI/FS) work plan for the 200-SW-2 OU to Ecology.</u>	<u>12/31/2011</u>
<u>M-015-93B</u>	<u>Submit RCRA Facility Investigation/Corrective Measures Study &amp; Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU to Ecology.</u>	<u>12/31/2016</u>
<u>M-015-110A</u>	<u>Submit RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) &amp; Remedial Investigation/Feasibility Study (RI/FS) work plan for the 200-DV-1 OU to Ecology. The work plan shall include technology screening that identifies technologies applicable for characterization, treatment, and monitoring of deep vadose zone contaminants.</u>	<u>09/30/2012</u>
<u>M-015-110B</u>	<u>Submit Corrective Measures Study &amp; Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision for the 200-DV-1 OU to Ecology.</u>	<u>09/30/2015</u>
<u>M-015-110C</u>	<u>Submit uranium treatment technology field test plan as an element of the RCRA facility investigation and remedial investigation for the 200-DV-1 OU to Ecology.</u>	<u>12/31/2010</u>
<u>M-015-110D</u>	<u>Submit technetium-99 pilot scale treatability study test report(s) as an element of remedial investigation for the 200-BC-1/200-WA-1 OUs to EPA.</u>	<u>6/30/2012</u>

Number	Milestone	Due Date
M-015-38B	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 Ecology. This proposed plan may be used as a basis for a Record Of Decision for the Outer Central Plateau Area.	<u>04/30/2012</u> 11/30/2010
M-015-17A	Submit a 200-UP-1 OU Combined Remedial Investigation and Feasibility Study Report as well as a and Proposed Plan to EPA Ecology.	09/30/2010
M-015-21A	Submit a 200-BP-5 and 200-PO-1 OU Feasibility Study Report and Proposed Plan(s) to EPA Ecology.	12/31/2012
M-015-44C	Submit 200-MW-1 OU Proposed Plan to EPA.	06/30/2011
M-015-51	SUBMIT A REVISED FEASIBILITY STUDY REPORT AND PROPOSED PLAN FOR THE 200 BC CRIBS AND TRENCHES FOR THE NEW OU 200 BC 1 TO EPA, THAT WILL INCLUDE THE RESULTS OF THE TREATABILITY TESTS FOR 200 BC CRIBS AND TRENCHES.	06/30/2011
M-015-73	SUBMIT FEASIBILITY STUDY REPORT AND PROPOSED PLAN FOR THE 200 PO 1 OPERABLE UNIT.	12/31/2011
M-015-83	SUBMIT A PROPOSED PLAN FOR 200-UW-1	6/30/2011