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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 15, 2012

12-NWP-079

Matt McCormick, Manager  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, Washington 99352

Re: Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)  
Change Package C-12-02 and M-15-12-02

Dear Mr. McCormick:

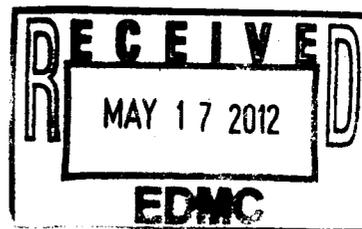
Copies of the Tri-Party Agreement Change Control Packages C-12-02 and M-15-12-02 signed by J.A. Dowell, D.A. Faulk, and Jane Hedges are enclosed. These change packages establish new interim milestones for Orchard Lands. Terry Noland picked up the original, signed documents at our office on May 9, 2012.

If you have any questions, you may call me at 509-372-7921.

Sincerely,

John B. Price  
Tri-Party Agreement Section Manager  
Nuclear Waste Program

dbm  
Enclosures



cc w/enc electronic:

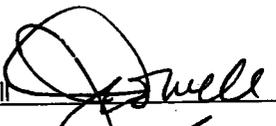
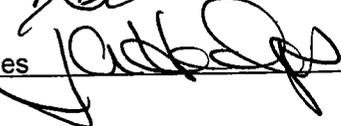
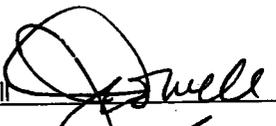
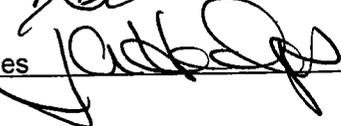
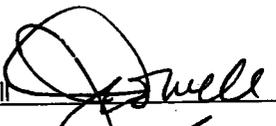
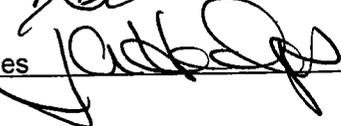
Woody Russell, USDOE-ORP  
Steve Weil, USDOE-RL

Terry Noland, MSA  
Judy Vance, MSA

cc w/enc:

Dennis Faulk, EPA  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN

Susan Leckband, HAB  
Administrative Record: M-15  
Environmental Portal  
USDOE-RL Correspondence Control

<b>Change Number</b> C-12-02	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b> May 7, 2012									
<b>Originator</b> B.L. Charboneau		<b>Phone</b> (509) 373-6137									
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager											
<b>Change Title</b> Addition of the 100-OL-1 Operable Unit to the Tri-Party Agreement (TPA) Appendix C.											
<b>Description/Justification of Change</b> Approval of this change package will add the 100-OL-1 Operable Unit (OU) containing the orchard lands identified below in Figure 1 to the Hanford Federal Facility Agreement and Consent Order (HFFACO or TPA or Tri-Party Agreement), Attachment 2, Appendix C. Approval of this change package will also add the new orchard lands waste management units (contained in the 100-OL-1 OU) to the Tri-Party Agreement Waste Information Data System (WIDS). <b>Section 3.1 of the HFFACO Action Plan states that: "A waste management unit represents any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact."</b>  <i>continued on page 2</i>											
<b>Impact of Change</b> This change package establishes new waste management units and an operable unit, 100-OL-1, containing the orchard lands identified in Figure 1 and modifies the existing Tri-Party Agreement WIDS and Appendix C. Associated milestone for submission of the Remedial Investigation/Feasibility Study Work Plan will be established under a separate change request.											
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended, WIDS and Appendix C will be altered to include the new waste management units and the 100-OL-1 OU. The Hanford Site internal planning management, and budget documents (e. g., USDOE and USDOE contractor Baseline Change Control documents; Project Management Plans).											
<b>Approvals</b> <table border="0" style="width: 100%;"> <tr> <td style="width: 30%; vertical-align: top;"> J. A. Dowell  DOE </td> <td style="width: 20%; vertical-align: top;">   5.7.12  Date </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="vertical-align: top;"> D. A. Faulk  EPA </td> <td style="vertical-align: top;">   5/8/12  Date </td> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="vertical-align: top;"> J. A. Hedges  Ecology </td> <td style="vertical-align: top;">   5/9/12  Date </td> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> </tr> </table>			J. A. Dowell DOE	 5.7.12 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	D. A. Faulk EPA	 5/8/12 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	J. A. Hedges Ecology	 5/9/12 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
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J. A. Hedges Ecology	 5/9/12 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved									

**Description/Justification of change, continued**

The River Corridor of the Hanford Site includes approximately 8,300 acres of pre-1943 farmsteads, of which approximately 5,000 acres are orchard lands. Lead arsenate was a common insecticide used in orchard lands. Lead arsenate use in Washington State effectively terminated in 1948, when DDT became widely available to the public (*Re-establishing Apples Orchards in the Chelan-Manson Area* [Benson et al., 1969]); however, its persistence makes it a continuing concern. Limited sampling of the orchard land soils has indicated the presence of arsenic and lead concentrations above Hanford soil background levels. The addition of the 100-OL-1 OU is needed because orchard lands' contamination may require action to mitigate a potential environmental or human health impact. An assessment of the threat posed and an evaluation of any alternatives necessary to protect human health and the environment is needed.

This change package identifies a single, process-based OU, 100-OL-1, which includes non-contiguous orchard land areas as depicted in Figure 1. The 100-OL-1 OU contains areas only on the south side of the Columbia River as shown in Figure 1 below. Completion of the RI/FS process for the 100-OL-1 operable unit is not subject to TPA Milestone M-15-00D "DOE shall complete the RI/FS process through the submittal of a Proposed Plan for all 100 and 300 Area operable units" A milestone for submitting the RI/FS Work Plan for 100-OL-1 will be established under a separate change request.

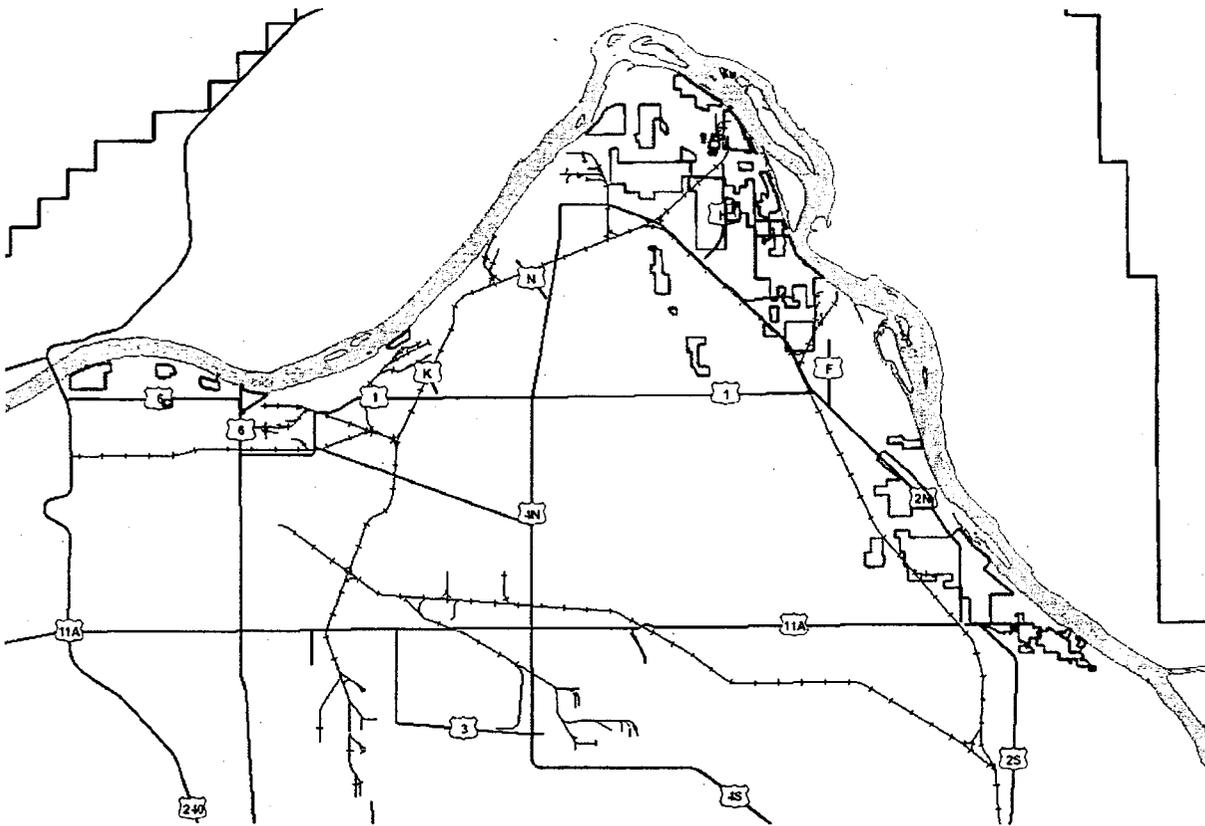


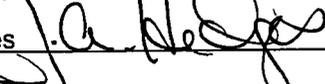
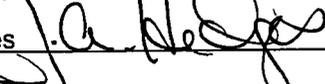
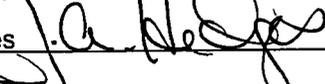
Figure 1: Map of Hanford 100 Areas depicting orchard lands boundaries in green

Modifications to TPA Appendix C are denoted by the use of ~~strikeout~~ to indicate text to be deleted and double underline to indicate text to be added.

**Appendix C**

Listing by Operable Unit. (Sheet x of xx)

OPERABLE UNIT Waste Unit Name	LEAD REGULATORY AGENCY Waste Unit Aliases	Unit Type	Status
<u>100-01-1</u>	<u>EPA/Ecology</u>	<u>CPP</u>	

<b>Change Number</b> M-15-12-02	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b> May 7, 2012																					
<b>Originator</b> B.L. Charboneau		<b>Phone</b> (509) 373-6137																					
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																							
<b>Change Title</b> Establish a new milestone to develop a remedial investigation/feasibility study work plan to evaluate the 100-OL-1 Operable Unit.																							
<b>Description/Justification of Change</b> <p>The 100-OL-1 Operable Unit (OU) was established in change package C-12-02. The 100-OL-1 OU covers orchard lands in existence prior to Hanford operations. An arsenic-based insecticide, lead arsenate, was used in approximately 5,000 acres of non-contiguous historical orchard lands, along the Columbia River corridor, during orchard operation. Lead arsenate use in Washington State effectively terminated in 1948 (Re-establishing Apples Orchards in the Chelan-Manson Area [Benson, et. al., 1969]). However, lead arsenate's persistence at the historical orchard land sites raises a concern of potential threat to human health and the environment. Therefore, the Parties have agreed to evaluate the potential threat through the CERCLA RI/FS process.</p> <p><i>continued on page 2</i></p>																							
<b>Impact of Change</b> This change package establishes a new interim milestone to develop a remedial investigation/feasibility study work plan to evaluate the 100-OL-1 OU.																							
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e. g., USDOE and USDOE contractor Baseline Change Control documents; Project Management Plans).																							
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J. A. Hedges Ecology		5/9/12 Date	<input checked="" type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved																	

**Description/Justification of change, continued**

This change control form establishes an interim milestone for a 100-OL-1 OU RI/FS work plan.

Addition of an interim milestone to Appendix D denoted by the use of ~~strikeout~~ double underline to indicate text to be added.

<u>M-015-95</u> <u>Lead</u> <u>Agency:</u> <u>Dual Lead</u> <u>Ecology and</u> <u>EPA</u>	<u>Submit Remedial Investigation/Feasibility Study work plan for the</u> <u>100-OL-1 OU to EPA and Ecology.</u>	<u>4/30/2013</u>
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