



U.S. Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

052506

OCT 17 1997

File Name _____

Integrated _____

RCRA _____ CERCLA _____

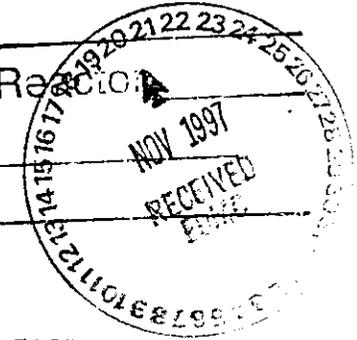
WQ _____ AQ _____

Administrative _____

EFSEC _____ N-React _____

Milestones _____

Cross reference _____



Mr. C. Clarke, Regional Administrator
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Mr. T. Fitzsimmons, Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Clarke and Fitzsimmons:

COMPLETION OF NEGOTIATIONS FOR REVISION OF THE HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONES FOR ENVIRONMENTAL RESTORATION'S (ER) 200 AREAS SOIL WASTE SITES

Enclosed for your signature is the tentative agreement (Enclosure 1) to approve the completed change packages to revise Milestones M-13 and M-20 of the Tri-Party Agreement as they relate to the ER Project's remediation of soil waste sites in the 200 Area of the Hanford Site. These negotiations were required because the existing interim and target milestones no longer accurately reflect the path forward for this project as determined by the ER Project's 200 Areas Soil Remediation Strategy and Waste Site Grouping for 200 Areas Soil Investigations. Also provided for your information, as Enclosures 2 and 3, are copies of the draft change packages to revise Milestones M-13 and M-20.

In October of 1996, the tri-parties agreed that negotiations should commence following the issuance of Revision 0 of the strategy document. It was also agreed that any new or revised milestones to be proposed would be consistent with the technical approach described in the strategy. An Agreement-in-Principle was signed on May 8, 1997. These commitments were developed in conjunction with members of the State of Washington Department of Ecology (Ecology) and U.S. Environmental Protection Agency (EPA) staff.

The negotiation team from the U.S. Department of Energy, Richland Operations Office (RL), Ecology, and EPA staffs have kept the Hanford Advisory Board and other interested stakeholders apprised of progress throughout the negotiations.

The original tentative agreement is being provided to Ecology and EPA for signature. It is then requested that Ecology forward the original signed agreement to EPA for signature. After signature is obtained by both Ecology and EPA, please return the original signed tentative agreement to Mr. Bryan L. Foley, Project Manager, at MSIN H0-12.

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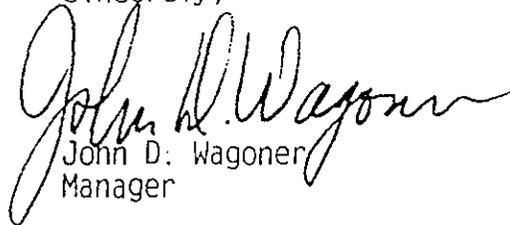
Messrs. Clarke and Fitzsimmons

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If you want to discuss this matter further or require additional information, please contact me, or your staff may contact Mr. Foley at (509) 376-7087.

Sincerely,



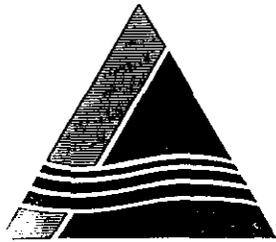
John D. Wagoner
Manager

RAP:BLF

Enclosures: As stated

cc w/encls:

J. W. Donnelly, Ecology
D. A. Faulk, EPA
M. K. Harmon, EM-442
G. B. Mitchem, BHI
R. D. Morrison, FDH
T. Post, EPA
D. R. Sherwood, EPA
E. R. Skinnerland, Ecology
M. A. Wilson, Ecology



052506

Tri-Party Agreement

CONCLUSION AGREEMENT ON NEGOTIATION FOR THE 200 AREAS SOIL REMEDIATION STRATEGY

In accordance with the requirements of the parties Agreement in Principle, dated April 30, 1997, the State of Washington Department of Ecology, the U.S. Environmental Protection Agency, and the U.S. Department of Energy, (the parties) have concluded negotiations on commitments for the 200 Areas Soil Remediation Strategy at the Hanford Site. A Tentative Agreement has been reached and a package of proposed changes to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) has been developed and found mutually acceptable to the parties. These changes are attached to this Negotiation Conclusion Agreement.

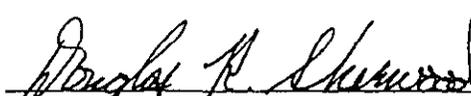
In addition to the attached changes to the Hanford Federal Facility Agreement and Consent Order, the parties have agreed that:

- The 200 Areas Soil Remediation Strategy - Environmental Restoration Program, DOE/RL-96-67, Rev. 0 and Waste Site Grouping for 200 Areas Soil Investigations, DOE/RL-96-81, Rev. 0 provide the necessary explanations to describe the improved investigation approach.
- USDOE shall drill a borehole in the B-2-2 Ditch to satisfy the requirement of the dispute resolution for 200-BP-11.
- Activities associated with the Hanford Prototype Barrier Program (200-BP-1) and 200-ZP-2 will continue and not be modified by this Agreement.
- Briefings and offers for consultations with stakeholders and the Tribes have been made and will continue, as appropriate, throughout the public comment and disposition period.

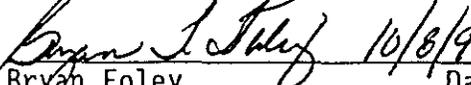
It is the parties' intent to submit the proposed changes for a 45 day public comment period to run from approximately October 20, 1997 to December 4, 1997. Specific Public Comment Period dates will be coordinated to ensure HAB opportunity for review and comment. Final approval of the Agreement changes is expected to occur by January 30, 1998. After successful resolution of any resulting public comments, a response to comments document will be issued.

Contingent upon final approval of the Tentative Agreement by the Signatories, and consideration and resolution of any resulting public comments, it is the parties' intent to approve these changes and incorporate them into the Agreement.


 Jack Donnelly 10/8/97
 Lead Negotiator for the Date
 State of Washington
 Department of Ecology


 Doug Sherwood 10/8/97
 Lead Negotiator for the Date
 U. S. Environmental Protection
 Agency


 George Sanders 10/8/97
 Lead Negotiator for the Date
 U.S. Department of Energy


 Bryan Foley 10/8/97
 Lead Negotiator for the Date
 U. S. Department of Energy



Tri-Party Agreement

052506

TENTATIVE AGREEMENT ON NEGOTIATIONS FOR THE
200 AREAS SOIL REMEDIATION STRATEGY

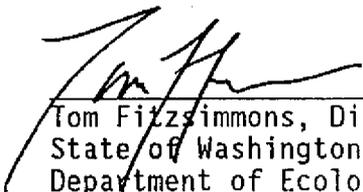
On April 30, 1997, the U.S. Department of Energy, the State of Washington Department of Ecology and the U.S. Environmental Protection Agency agreed to enter into negotiations on matters relating to developing an improved process for completing the soil investigations for Environmental Restoration Program contaminated soil sites in the 200 Areas. This agreement was followed by negotiation which established modifications to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). The parties agreed to change Appendix D, Work Schedule, M-13 and M-20 milestones.

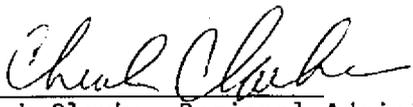
Pursuant to the Agreement in Principle, dated April 30, 1997, the three parties have concluded the 200 Areas Soil Remediation Strategy negotiations and have reached tentative agreement. A copy of this agreement is attached.

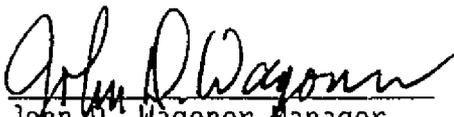
In accordance with the provisions of the Tri-Party Agreement, the proposed changes will be submitted to the public for review and comment over a 45 day period. Copies of the package will be available for review at the public information repositories. Following the 45 day public comment period, the parties will make appropriate revisions before finalizing these changes. The parties anticipate final signatures to take place by January 30, 1998. Prior to finalization, a response to comments document will be issued.

The parties further agree to minimize additional delay in the event the parties fail to agree on any changes as the result of public comment. All unresolved matters shall be referred to the Tri-Party Agreement dispute resolution process beginning at the Inter Agency Management Integration Team (IAMIT) level as described in the Tri-Party Agreement. The parties shall attempt to resolve the dispute(s) as provided in the Tri-Party Agreement paragraph 30 and/or 59.

Signed this 31 day of October 1997


Tom Fitzsimmons, Director
State of Washington
Department of Ecology


Chuck Clarke, Regional Administrator
U.S. Environmental Protection Agency
Region 10


John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

Change Number M-13-97-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 10/7/97
Originator Linda Bauer		Phone 376-6628
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Milestone Series M-13 Revisions to Support 200 Area Soil Remediation Strategy		
Description/Justification of Change <p>M-13-00 contains schedules for the submittal of work plans for accomplishing necessary investigations to complete all 200 Areas soil investigations by December 31, 2008 (M-15-00C). The three parties jointly developed an improved approach to investigation and subsequent remediation of 200 Areas contaminated soil sites within the responsibility of the Environmental Restoration Program (EM-40) based on lessons learned from Hanford's 100 and 300 Areas. To date, the investigation approach for the 200 Areas has been based on a geographic boundary (operable unit) consisting of different waste site types. Remedial investigations will now focus on representative sites from groups with similar history and waste site types (ponds, ditches, cribs, etc.), and the results will be generally applied to the entire waste site group.</p> <p>[Description/Justification of Change is continued]</p>		
Impact of Change <p>Modifications of the Tri-Party Agreement that are needed to accommodate this strategy are as follows:</p> <ul style="list-style-type: none"> • Modify milestone M-13-00K to require only one work plan. • Delete milestone M-13-00Q to be consistent with the current reduced number of work plans. • Delete interim milestones M-13-11, M-13-12, M-13-13, M-13-14, M-13-15, M-13-16, and M-13-17. These milestones are replaced with milestones M-13-18 through M-13-24. • Add interim milestone M-13-18, "Submit 200 Area RI/FS (RFI/CMS) Implementation Plan.", 8/31/98. <p>[Impact of Change is continued]</p>		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan.		
Approvals _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved DOE _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved EPA _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved Ecology		

Description/Justification of Change (continued)

The 200 Area RI/FS (RFI/CMS) Implementation Plan (which will be a primary document per Section 9 of the TPA and will establish the common requirements for future characterizations in the 200 Areas) will provide up front approval of all cross-cutting aspects of the characterizations and individual Work Plans for the 23 waste site groups (previously 32 work plans were required) which will be prepared to address site-specific requirements. These plans will incorporate both *Resource Conservation and Recovery Act* (RCRA) requirements as well as *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) requirements (see associated Agreement Change Control Form for M-20-97-01 for additional detail). These documents in combination will meet all substantive requirements of CERCLA RI/FS and RCRA RFI/CMS Work Plans. Interim milestones M-13-18 through M-13-24 reflect this approach and replace milestones M-13-11 through M-13-17. Major milestone M-13-00K and M-13-00Q will be revised to accommodate the reduced number of work plans to be generated. The waste site groupings will require redesignation of existing Operable Units associated with 200 Areas soil remediation in the Environmental Restoration project. Changes to Appendix C of the Action Plan will be required to reflect these new operable unit designations and will be performed upon approval of this change control form. Please refer to associated Agreement Change Control Form M-20-97-01 for additional changes to M-20 milestones.

Impact of Change (continued):

- Add interim milestone M-13-19, "Submit 200 North Pond and Trenches Cooling Water Group Work Plan.", 2/28/99.
- Add interim milestone M-13-20, "Submit 200 Gable Mountain/B Pond and Ditch Cooling Water Group Work Plan.", 4/30/99.
- Add interim milestone M-13-21, "Submit 200 Chemical Sewer Group Work Plan.", 8/31/99.
- Add interim milestone M-13-22, "Submit 200 U Pond/Z-Ditches Cooling Water Group Work Plan.", 12/31/99.
- Add interim milestone M-13-23, "Submit Uranium Rich Process Waste Group Work Plan.", 4/30/00.
- Add interim milestone M-13-24, "Submit General Process Waste Group Work Plan.", 8/31/00.

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-13-00K	SUBMIT 1 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2000
M-13-00L	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2001
M-13-00M	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2002
M-13-00N	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2003
M-13-00O	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2004
M-13-00P	SUBMIT 4 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2005
M-13-18	SUBMIT 200 AREA RI/FS (RFI/CMS) IMPLEMENTATION PLAN.	8/31/1998
M-13-19	SUBMIT 200 NORTH POND COOLING WATER GROUP WORK PLAN	2/28/1999
M-13-20	SUBMIT GABLE MOUNTAIN/B POND AND DITCH COOLING WATER GROUP WORK PLAN.	4/30/1999
M-13-21	SUBMIT CHEMICAL SEWER GROUP WORK PLAN.	8/31/1999
M-13-22	SUBMIT U POND/Z-DITCHES COOLING WATER GROUP WORK PLAN.	12/31/1999
M-13-23	SUBMIT URANIUM RICH PROCESS WASTE GROUP WORK PLAN.	4/30/2000
M-13-24	SUBMIT GENERAL PROCESS WASTE GROUP WORK PLAN.	8/31/2000

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-13-00K	SUBMIT 21 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2000
M-13-00L	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2001
M-13-00M	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2002
M-13-00N	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2003
M-13-00O	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2004
M-13-00P	SUBMIT 4 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2005
M-13-00Q	SUBMIT 4 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2006
M-13-11	SUBMIT 200 PO 2 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.	6/30/1998
M-13-12	SUBMIT 200 PO 4 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.	10/31/1998
M-13-13	SUBMIT 1 200 NPL RI/FS (RFI/CMS) WORK PLAN.	12/31/1998
M-13-14	SUBMIT 200 IU 3 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.	2/28/1999
M-13-15	SUBMIT 200 RO 1 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.	6/30/1999
M-13-16	SUBMIT 200 PO 5 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.	10/31/1999
M-13-17	SUBMIT 200 SO 1 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.	2/28/2000
M-13-18	SUBMIT 200 AREA RI/FS (RFI/CMS) IMPLEMENTATION PLAN.	8/31/1998
M-13-19	SUBMIT 200 NORTH POND COOLING WATER GROUP WORK PLAN	2/28/1999
M-13-20	SUBMIT GABLE MOUNTAIN/B POND AND DITCH COOLING WATER GROUP WORK PLAN.	4/30/1999
M-13-21	SUBMIT CHEMICAL SEWER GROUP WORK PLAN.	8/31/1999
M-13-22	SUBMIT U POND/Z-DITCHES COOLING WATER GROUP WORK PLAN.	12/31/1999
M-13-23	SUBMIT URANIUM RICH PROCESS WASTE GROUP WORK PLAN.	4/30/2000
M-13-24	SUBMIT GENERAL PROCESS WASTE GROUP WORK PLAN.	8/31/2000

Change Number M-20-97-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 10/7/97															
Originator Linda Bauer		Phone 376-6628															
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																	
Change Title Agreement Milestone series M-20 Revisions to Support 200 Area Soil Remediation Strategy																	
Description/Justification of Change <p>M-20-00 contains schedules for the submittal of closure plans for the cleanup of treatment, storage, and disposal (TSD) sites under the <i>Resource Conservation and Recovery Act (RCRA)</i>. The three parties jointly developed an improved approach to investigation and subsequent remediation of RCRA TSD waste sites closely associated with past-practice units within the Environmental Restoration (ER) Program (EM-40), based on lessons learned from Hanford's 100 and 300 Areas. The coordination of the TSD units closure with the past-practice investigation and remediation activity is necessary to prevent overlap and duplication of work, thereby economically and efficiently addressing the contamination. These TSD groups/units assigned to an operable unit are prioritized in conjunction with past-practice priorities for purposes of investigations and are to be investigated and managed in conjunction with past-practice units. Remedial investigations will now focus on representative sites from groups with similar history and waste site types (ponds, ditches, cribs, etc.), and the results will be generally applied to the entire waste site group.</p> <p style="text-align: right;">[Description/Justification of Change is continued]</p>																	
Impact of Change <p>Modifications to implement this strategy are:</p> <ul style="list-style-type: none"> • M-20-00 major milestone has been changed to February 28, 2004 and reference to EPA is to be deleted. • M-20-33 interim milestone has been changed to delete reference to EPA and to be in coordination with the Uranium Rich Process Waste Group with the corresponding Due Date changed to 10/31/2003. • M-20-39 interim milestone has been changed to delete reference to EPA and to be in coordination with the Chemical Sewer Group with the corresponding Due Date changed to 2/28/2003. <p style="text-align: right;">[Impact of Change is continued]</p>																	
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan.																	
Approvals <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-bottom: 1px solid black;">DOE</td> <td style="width: 15%; border-bottom: 1px solid black;">Date</td> <td style="width: 15%; text-align: center;">___ Approved</td> <td style="width: 15%; text-align: center;">___ Disapproved</td> <td style="width: 25%;"></td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">___ Approved</td> <td style="text-align: center;">___ Disapproved</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;">Ecology</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">___ Approved</td> <td style="text-align: center;">___ Disapproved</td> <td></td> </tr> </table>			DOE	Date	___ Approved	___ Disapproved		EPA	Date	___ Approved	___ Disapproved		Ecology	Date	___ Approved	___ Disapproved	
DOE	Date	___ Approved	___ Disapproved														
EPA	Date	___ Approved	___ Disapproved														
Ecology	Date	___ Approved	___ Disapproved														

Description/Justification of Change (continued):

These investigations will be sufficiently comprehensive to satisfy the technical requirements of both RCRA and *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA). Technical requirements of both RCRA and CERCLA are not all inclusive, but are focused on the initial stages of cleanup/closure where representative data is generally adequate for remedy selection purposes. However, it is recognized that waste site specific data is required to satisfy RCRA Closure/Postclosure requirements. The information necessary for performing RCRA closures/postclosures will be provided in coordination with past-practice sites investigations and various RFI/CMS documents. The 200 Area RI/RS (RFI/CMS) Implementation Plan (which will be a primary document per Section 9 of the TPA and will establish the common requirements for future characterizations in the 200 Areas) will provide up front approval of all cross-cutting aspects of the characterizations and individual Work Plans for the 23 waste site groups (previously 32 work plans were required) will be prepared. These plans will incorporate both RCRA requirements as well as CERCLA requirements (see associated Agreement Change Control Form for M-13-97-01 for additional detail). These documents in combination will meet all substantive requirements of CERCLA RI/FS and RCRA RFI/CMS Work Plans. The existing M-13 and M-20 milestones are not aligned to compliment integration and the adjustment of the M-20-00 milestone to 2/28/2004 allows for a coordinated alignment of these two milestones. Interim milestones M-20-33 through M-20-54 have been modified both in text and submittal dates to reflect this approach. Changes to Appendix B of the Action Plan will be required to reflect these new operable unit designations and will be performed upon approval of this change control form. Please refer to associated Agreement Change Control Form M-13-97-01 for additional changes to M-13 milestones.

Impact of Change (continued):

- M-20-52 interim milestone has been changed to delete reference to EPA and to be in coordination with the General Process Waste Group with the corresponding Due Date changed to 12/31/2003.
- M-20-53 interim milestone has been changed to delete reference to EPA and to be in coordination with the General Process Waste Group with the corresponding Due Date changed to 12/31/2003.
- M-20-54 interim milestone has been changed to delete reference to EPA and to be in coordination with the Infrastructure Waste Group with the corresponding Due Date changed to 2/28/2004.

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-20-00	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS. LEAD AGENCY: PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS ECOLOGY WILL BE SUBMITTED TO ECOLOGY FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D. PRECLOSURE WORK PLANS WILL BE PREPARED AND SUBMITTED FOR APPROVAL FOR TSD UNITS WHICH WILL ACHIEVE CLOSURE IN CONJUNCTION WITH THE DISPOSITION OF THE FACILITY IN WHICH THEY ARE CONTAINED.	2/28/2004
M-20-33	SUBMIT 216-A-10 CRIB AND 216-A-36B CRIB CLOSURE/POSTCLOSURE PLANS TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE URANIUM RICH PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-23).	10/31/2003
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE/POSTCLOSURE PLANS TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE CHEMICAL SEWER GROUP (TO BE COORDINATED WITH M-13-21).	2/28/2003
M-20-52	SUBMIT 216-A-37-1 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	12/31/2003
M-20-53	SUBMIT 207-A RETENTION BASIN CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	12/31/2003
M-20-54	SUBMIT 241-CX TANK SYSTEM CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE INFRASTRUCTURE WASTE GROUP (TO BE COORDINATED WITH M-13-00K).	2/28/2004

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-20-00	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS. LEAD AGENCY: PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS WILL BE SUBMITTED TO ECOLOGY AND/OR EPA FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D. PRECLOSURE WORK PLANS WILL BE PREPARED AND SUBMITTED FOR APPROVAL FOR TSD UNITS WHICH WILL ACHIEVE CLOSURE IN CONJUNCTION WITH THE DISPOSITION OF THE FACILITY IN WHICH THEY ARE CONTAINED.	12/31/2003 2/28/2004
M-20-33	SUBMIT 216-A-10 CRIB AND 216-A-36B CRIB CLOSURE/POSTCLOSURE PLANS TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN FOR OPERABLE UNIT 200 PO 2 (TO BE SATISFIED BY M-13-11) FOR URANIUM RICH PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-23).	6/30/98 10/31/2003
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE/POSTCLOSURE PLANS TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN FOR OPERABLE UNIT 200 RO 1 TO BE SATISFIED BY M-13-15) THE CHEMICAL SEWER GROUP WORK PLAN (TO BE COORDINATED WITH M-13-21).	6/30/99 2/28/2003
M-20-52	SUBMIT 216-A-37-1 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN OF OPERABLE UNIT 200 PO 4 (TO BE SATISFIED BY M-13-12) FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	10/31/98 12/31/2003
M-20-53	SUBMIT 207-A RETENTION BASIN CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN OF OPERABLE UNIT 200 PO 5 (TO BE SATISFIED BY M-13-16) FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	10/31/99 12/31/2003
M-20-54	SUBMIT 241-CX TANK SYSTEM CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN OF OPERABLE UNIT 200 SO 1 (TO BE SATISFIED BY M-13-17) FOR THE INFRASTRUCTURE WASTE GROUP (TO BE COORDINATED WITH M-13-00K).	2/28/2000 2/28/2004