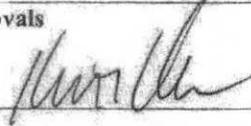
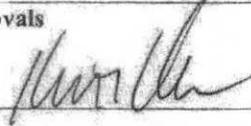
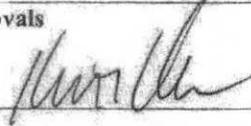


Change Number M-15-06-02	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date September 14, 2006										
Originator L. D. Romine, RL	Phone: 509-376-4747											
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager												
Change Title Modify Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) commitments to complete the Remedial Investigation/Feasibility Study (RI/FS) or RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) process for all operable units.												
Description/Justification of Change <p>This change request defers the due date for Major Milestones M-015-00 and M-015-00C by three years to allow for additional characterization at waste sites and groundwater. The proposed changes incorporate lessons learned from RI/FS and RFI/CMS activities conducted on the Central Plateau since 1998. Characterization of a number of Central Plateau waste sites has proven to be more complex than anticipated. Interim milestones are added and existing milestones are modified to provide better integration of the investigations of source (both waste site and tank farm) units with those for groundwater units.</p> <p>The U.S. Department of Energy Richland Operations Office (RL), the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA), hereinafter referred to as the Parties have agreed that approximately 350 waste sites (about 40% of the total) have shallow contamination that can be addressed by straight-forward remove, treat, and dispose methods. Non-tank farm and tank farm waste sites are being characterized in a coordinated manner. This improved timing also supports level loading of work to promote the efficient cleanup of the 200 Area. For example, the shallow contamination cleanup work could be addressed as "fill-in" work between cleanup efforts for complex, highly contaminated sites.</p> <p>In instances where Resource Conservation and Recovery Act (RCRA) authority requires investigation of past practice units, Ecology agrees, pursuant to Ecology's Dangerous Waste Regulations, that RL may satisfy the requirements for an RFI/CMS report by submitting an RI/FS report</p> <p>Description/Justification of change continued on page 2 of this change request.</p>												
Impact of Change This change extends the due date for Major Milestones M-015-00 and M-015-00C as well as several interim milestones within the M-015 series. This change package is also related to change packages numbered M-13-06-01, P-11-06-01 and C-06-02.												
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 authorizations and directives).												
<table border="0"> <tr> <td data-bbox="115 1541 597 1682"> Approvals  _____ DOE </td> <td data-bbox="597 1541 829 1682"> 1/29/07 _____ Date </td> <td data-bbox="829 1541 1218 1682"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> <td data-bbox="1218 1541 1461 1892" rowspan="3" style="text-align: center; vertical-align: middle;"> Page 1 of 5  MAR 13 2007 EDMC </td> </tr> <tr> <td data-bbox="115 1682 597 1787">  _____ EPA </td> <td data-bbox="597 1682 829 1787"> 2/21/07 _____ Date </td> <td data-bbox="829 1682 1218 1787"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td data-bbox="115 1787 597 1892">  _____ Ecology </td> <td data-bbox="597 1787 829 1892"> 2/25/07 _____ Date </td> <td data-bbox="829 1787 1218 1892"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> </table>			Approvals  _____ DOE	1/29/07 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	Page 1 of 5  MAR 13 2007 EDMC	 _____ EPA	2/21/07 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	 _____ Ecology	2/25/07 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
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 _____ EPA	2/21/07 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved										
 _____ Ecology	2/25/07 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved										

Description/Justification of Change continued:

To define additional characterization needs, RL agrees to complete supplemental Data Quality Objectives (DQOs). Sampling and analysis plans will be required as part of a new RI/FS work plan, which will reflect data needs identified during the DQO process. RI reports previously submitted will not be updated to incorporate supplemental data. The supplemental data will be incorporated into newly submitted or updated FS reports.

In September 2005, the Parties completed a process to group, or bin, waste sites into Conceptual Model Groups for the purpose of identifying additional characterization needs. One of the Conceptual Model Groups included simple waste sites for which current information is sufficient for decision-making. This change request package establishes a milestone for the two newly created operable units (OU) (200-MG-1 and 200-MG-2) to which these waste sites will be transferred. The list of these waste sites is shown in Change Package C-06-02. Cleanup alternatives for these waste sites will be identified and evaluated through two FSs covering 200-MG-1 and 200-MG-2. The 200-MG-1 OU will have Ecology as the lead regulatory agency, whereas the 200-MG-2 OU will have EPA as the lead regulatory agency.

Modifications to existing Tri-Party Agreement Milestone Series M-015

Modifications to existing Tri-Party Agreement milestones are denoted using ~~strikeout~~ for text deletions and **shading** for text additions. Explanations of change serve only to clarify differences between earlier versions of the milestone or to explain why the milestone was created. They are not part of the actual text of the milestone and will not be incorporated into Table D of the Tri-Party Agreement.

Number	Title	Due Date
M-015-00	Complete the RI/FS (or RFI/CMS) process for all operable units. 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.	12/31/2008 12/31/2011
M-015-00C	Complete all 200 Area non-tank farm operable unit pre-ROD 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.	12/31/2008 12/31/2011
M-015-17A	Submit a 200-UP-1 OU Combined Remedial Investigation and Feasibility Study Report as well as a Proposed Plan to Ecology.	11/30/2010
<p>Explanation of change: This change is based on the schedule for M-24 drilling plus the 2 years of monitoring in the approved work plan. An integrated RI/FS report will be developed instead of separate RI and FS reports.</p>		

M-015-21A	Submit 200-BP-5 OU Feasibility Study Report and Proposed Plan to EPA.	10/31/2010
Explanation of change: This is a new milestone requiring the submittal of a Feasibility Study and Proposed Plan for the 200-BP-5 OU.		
M-015-38B	Submit a revised Feasibility Study Report and revised Proposed Plan for 200-CW-1 to Ecology.	05/31/2009
Explanation of change: This change is based on (1) movement of ponds (216-S-16P, 216-S-17, 216-T-4A, 216-T-4B, 216-U-10) and related ditches and unplanned releases (UPR-200-W-124, 216-S-5, 216-U-9, and 216-U-11) from Operable Units 200-CW-2/4/5 and 200-SC-1 into 200-CW-1 and (2) the need for supplemental characterization of these ponds to support the revised feasibility study and proposed plan. Waste sites on the 200-CW-3/200 North OU will be cleaned-up under the 100 Area Remaining Sites ROD.		
M-015-40D	Submit a revised Feasibility Study Report and revised Proposed Plan for 200-CW-2, 200-CW-4, 200-CW-5 and 200-SC-1 OUs to EPA.	04/30/2008
Explanation of change: This change is based on movement of ponds and related unplanned releases and ditches to 200-CW-1 (see details in M-015-38B explanation of change) and schedule extension to allow completion of additional analysis related to implementability of potential remedies.		
M-015-42D	Submit a revised Feasibility Study Report and revised Proposed Plan for 200-TW-1 and 200-PW-5 OUs to EPA.	12/31/2011
Explanation of change: This change is based on the need for significant supplemental characterization. This milestone and milestone M-015-42E separate the 200-TW-2 OU from the 200-TW-1 and 200-PW-5 OUs (were grouped together in a milestone change package from 2002) to reestablish a single-lead regulatory agency to simplify the decision-making process.		
M-015-42E	Submit a revised Feasibility Study Report and a revised recommended remedy(ies) for 200-TW-2 OU to Ecology.	12/31/2011
Explanation of change: This change is based on the need for significant supplemental characterization. This milestone and milestone M-015-42D separate the 200-TW-2 OU from the 200-TW-1 and 200-PW-5 OUs (were grouped together in a milestone change package from 2002) to reestablish a single-lead regulatory agency to simplify the decision-making process.		
M-015-43D	Submit the Feasibility Study Report and the revised recommended remedy(ies) for 200-PW-2 and 200-PW-4 OUs to Ecology.	12/31/2010
Explanation of change: This change is based on the need for supplemental characterization of waste sites within the PW-2 OU.		
M-015-44B	Submit 200-MW-1 OU Feasibility Study Report and Proposed Plan to EPA.	4/30/2007 12/31/2008
Explanation of change: The change to this milestone is related to technical difficulties encountered in drilling the 216-A-4 Crib borehole and the need for additional characterization at the 200-E-102 Trench.		

M-015-45B	Submit Plutonium/Organic Rich OU the Feasibility Study Report and the Proposed Plan including past practice waste sites in the for 200-PW-1 OU Plutonium/Organic Rich Process Condensate/Process Waste Group OU, 200-PW-3 Organic Rich Process Condensate/Process Waste Group OU and 200-PW-6 Plutonium Rich Process Condensate/Process Waste Group OU OUs to EPA.	09/30/2007
Explanation of change: Added the clarifying word "Report" to "Feasibility Study" to identify one of the deliverables better and added the regulatory agency recipient.		
M-015-46B	Submit 200 Area Chemical Laboratory Waste OUs the Feasibility Study Report and the recommended remedy/ Proposed Permit Modification, including past practice waste sites in the for 200-LW-1 and 200-LW-2 200 Area Chemical Laboratory Groups OUs to Ecology.	11/30/2006 12/31/2011
Explanation of change: This change is based on the need for supplemental characterization for these OUs. 200-LW-1 300 Area Laboratory Waste and 200-LW-2 200 Area Chemical Laboratory Waste OUs are low priority for sequencing of supplemental characterization.		
M-015-48B	Submit Draft A 200-ZP-1 CERCLA OU Feasibility Study Report and Proposed Plan to EPA.	05/31/2007 09/30/2007
Explanation of change: The revised date aligns with 200-PW-1 schedules to utilize key data. The date for this milestone was revised to align the submittal of the groundwater operable unit feasibility study and proposed plan with the key source operable unit feasibility study and proposed plan.		
M-015-49A	Submit a Feasibility Study Report and a recommended remedy for the 200-MG-1 OU, which includes Model Group 1 waste sites to Ecology (see Appendix C change request C-06-02).	12/31/2008
Explanation of change: 200-MG-1 is a new OU that includes Model Group 1 sites transferred from other OUs as a result of the waste site binning process completed in 2005. Model Group 1 consists of generally small and shallow waste sites that are expected to have similar remedies. Contemporaneously with this change request, Appendix C is to be modified to create the new OU 200-MG-1 for Model Group 1 waste sites where Ecology is the lead regulatory agency. The Parties expect that in addition to the remediation schedule required as a part of the Remedial Design/Remedial Action Work Plan that they will meet annually to revise that schedule. The annual meeting (and schedule adjustment) is anticipated because the Parties recognize that remediation of the 200-MG-1 sites could be used as "fill-in" work for larger, more complex remediation projects.		

M-015-49B	Submit a Feasibility Study Report and a Proposed Plan for the 200-MG-2 OU, which includes Model Group 1 waste sites to EPA (see Appendix C change request C-06-02).	12/31/2008
<p>Explanation of change: 200-MG-2 is a new OU that includes Model Group 1 sites transferred from other OUs as a result of the waste site binning process completed in 2005. Model Group 1 consists of generally small and shallow waste sites that are expected to have similar remedies.</p> <p>Contemporaneously with this change request, Appendix C is to be modified to create the new OU 200-MG-2 for Model Group 1 waste sites where EPA is the lead regulatory agency. The Parties expect that in addition to the remediation schedule required as a part of the Remedial Design/Remedial Action Work Plan that they will meet annually to revise that schedule. The annual meeting (and schedule adjustment) is anticipated because the Parties recognize that remediation of the 200-MG-2 sites could be used as "fill-in" work for larger, more complex remediation projects.</p>		
M-015-50	Submit a Treatability Test Work Plan for Deep Vadose Zone Technetium and Uranium to Ecology and EPA. The Treatability Test Work Plan shall be a Tri-Party Agreement primary document subject to Ecology and EPA approval.	12/31/2007
<p>Explanation of change: This is a new milestone to submit a work plan in accordance with Section 11.6 of the Tri-Party Agreement Action Plan to survey and field test promising technologies for treatment of deep soil-zone contaminants.</p>		
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.	04/30/2010
<p>Explanation of change: See Appendix C Change Form C-06-02.</p>		