

Change Number M-91-21-04	Federal Facility Agreement and Consent Order Change Control Form		Date 11/03/2021
Originator Mark French			Phone 373-9863
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Modifications to Interim Milestones M-091-59, M-091-61, and M-091-62 in TPA Action Plan, Appendix D			
Description/Justification of Change <p>The U.S. Department of Energy (DOE) and Washington State Department of Ecology (Ecology) approved Tri-Party Agreement (TPA) Change Control Form M-91-19-03 on October 1, 2021 with the approval of the <i>Final Approval Package for the Tentative Agreement on the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Revisions in Response to the Milestone M-091 Series Negotiations</i> (reference: https://pdw.hanford.gov/document/AR-16817).</p> <p>On February 10, 2021, the DOE and Ecology had approved the <i>Tentative Agreement on Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Revisions in Response to the Milestone M-091 Series Negotiations</i> (reference: https://pdw.hanford.gov/document/AR-07648).</p> <p>This change control form fixes the differences between the milestone descriptions in the Final Approval Package and Tentative Agreement for TPA interim Milestones M-091-59, M-091-61, and M-091-62, to reflect the changes the Parties originally agreed to in the Tentative Agreement.</p> <p>This change control form also adds mixed low-level waste (MLLW) into TPA interim Milestone M-091-61 to address an Ecology deficiency identified in Ecology letter 21-NWP-158, Attachment A, Section VI. Treatment Schedules, which states: since MLLW-02, MLLW-03, MLLW-04, and MLLW-07 are not being sent to the Waste Isolation Pilot Plant (WIPP) for disposal, but are instead being treated at off-site treatment, storage, and disposal facilities prior to disposal at Hanford, a separate treatment schedule is needed for these waste streams.</p>			
Impact of Change This change control form updates the descriptions in the scope of Milestones M-091-59, M-091-61, and M-091-62. There is no impact to major milestone M-091-00 with this change.			
Affected Documents The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents, Project Management Plans).			
Approvals			Page 1 of 2
William F. Hamel Digitally signed by William F. Hamel Date: 2021.12.20 13:06:25 -08'00' Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>			
W.F. Hamel, DOE-RL Date Schleif, Stephanie (ECY) Digitally signed by Schleif, Stephanie (ECY) Date: 2021.12.21 13:41:54 -08'00' Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>			
D.B. Bowen, Ecology Date N/A Approved _____ Disapproved _____			
D.R. Einan, EPA Date			

Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p>M-091-59 Lead Regulatory Agency: Ecology</p>	<p>Remove all mixed waste containers from Outside Storage Area A and B.</p> <p>Removal constitutes either:</p> <ul style="list-style-type: none"> • Shipment of the container(s) to a TSDF for repack or disposal • Relocating the container(s) to a storage area authorized by the Hanford Facility Dangerous Waste Permit, or a Temporary Authorization issued pursuant to WAC 173-303-830. 	<p>9/30/2026</p>
<p>M-091-61 Lead Regulatory Agency: Ecology</p>	<p>Complete <u>treatment to LDR treatment standards for CH small containers of MLLW and TRUM waste (in above ground storage as of June 30, 2009).</u> DOE will dispose of MLLW and may choose to <u>initiate</u> the certification and shipment of CH small packages of TRUM waste for disposal at WIPP in lieu of LDR treatment <u>if, as of the time of shipment, such waste is exempt from LDR treatment standards when disposed at WIPP.</u></p>	<p>9/30/2040</p>
<p>M-091-62 Lead Regulatory Agency: Ecology</p>	<p>Complete <u>treatment to LDR treatment standards for CH large containers of TRUM waste (in above ground storage as of June 30, 2009).</u> DOE may choose to <u>initiate</u> the certification and shipment of CH large boxes of TRUM waste for disposal at WIPP in lieu of LDR treatment <u>if, as of the time of shipment, such waste is exempt from LDR treatment standards when disposed at WIPP.</u></p>	<p>9/30/2045</p>