



Department of Energy

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JAN 11 1994

94-ERB-051

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. Roger F. Stanley, Director  
Tri-Party Agreement Implementation  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Stanley:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM -  
CHANGE MILESTONE M-13-07 DUE DATE FOR THE SUBMITTAL OF THE INTEGRATED  
200-BP-11 OPERABLE UNIT AND 216-B-3 MAIN POND WORK/CLOSURE PLAN TO THE  
REGULATORS

Enclosed for approval is the subject Class II Change Control Form. This Change Control Form was prepared in response to agreements reached between 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), at the November 17, 1993, Comprehensive Environmental Response, Compensation and Liability Act Unit Managers Meeting. The purpose of this change request is to change the due date for the submittal of DOE/RL-93-74, "Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan" Draft, to the regulators. The change of the due date is in support of data quality objective meetings being held between RL, Ecology, EPA, and the Westinghouse Hanford Company. The meetings are taking longer than expected due to the complexity of the integration of the Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and/or Disposal and RCRA past-practice waste management units. The revised date will be 172 days after completion of the data quality objective process. A Class III Change Request will be prepared at that time to establish the final date for submittal.

If you have any questions, please contact Mr. R. G. McLeod at (509) 372-0096.

Sincerely,

*James D. Bauer*  
Steven H. Wisness  
Hanford Project Manager

END:RGM

Enclosure

cc: See page 2

Messrs. Sherwood and Stanley  
94-ERB-051

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cc w/encl:

B. A. Austin, WHC  
M. T. Janaskie, EM-442  
D. C. Nylander, Ecology  
J. Phillips, Ecology  
R. K. Tranbarger, WHC  
J. Wallace, Ecology  
T. M. Wintczak, WHC

Change Number M-13-94-01	<b>Federal Facility Agreement and Consent Order          Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date January , 1994
Originator R. K. Tranbarger		Phone 372-1258
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Change the due date of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone, M-13-07, "Submit <i>Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan</i> to Ecology and EPA."		
Description/Justification of Change <p>The M-13-07 Milestone due date of April 1994 for the submittal of the <i>Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan</i> to the Regulators was approved on August 3, 1993 per Tri-Party Agreement Change Control Form M-13-93-01/C-93-07. Because integration of a work plan and closure plan has never been performed at the Hanford Site, meetings are being held between the DOE, Ecology, EPA, and WHC to discuss data quality objectives (DQOs) and the sampling and analysis plan for the 200-BP-11 Operable Unit. These meetings are more comprehensive and time consuming than originally planned and therefore are affecting the original schedule for completion of the work/closure plan. The schedule for setting of a new submittal date for the work/closure plan is attached.</p>		
Impact of Change This Change impacts only the due date for the submittal of the <i>Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan</i> .		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D (Work Schedule).		
Approvals      ___ Approved      ___ Disapproved  _____ Date DOE  _____ Date EPA  _____ Date Ecology		

**Schedule for the New Due Date for Submittal of the  
*Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan*  
to the Regulators**

Last DQO meeting plus:

Forty-five days to complete WHC Internal Draft of the work/closure plan for WHC review.

Thirty days for WHC review.

Thirty days to disposition WHC comments, incorporate comments, and prepare the Predecisional Draft for submittal to the DOE.

Thirty days for DOE review.

Thirty days to disposition DOE comments, incorporate comments, and prepare Draft A for submittal to Ecology and EPA.

Seven days to submit the *Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan* to Ecology and EPA.

The above document review and comment incorporation schedule is typical for a CERCLA Work Plan. The extension of the schedule is based solely on the extra time needed to complete the DQO process, which involves all of the Tri-Parties.

In summary, a maximum total of 172 days (5.7 months) is needed, after completion of the DQO process, to submit the *Integrated 200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan*.

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL (R. K. Tranbarger, WHC)	D. R. Sherwood, EPA R. F. Stanley, Ecology	Incoming: 9400517 Xref:9450222D

**Subject:** HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM - CHANGE MILESTONE M-13-07 DUE DATE FOR THE SUBMITTAL OF THE INTEGRATED 200-BP-11 OPERABLE UNIT AND 216-B-3 MAIN POND WORK/CLOSURE PLAN TO THE REGULATORS

### INTERNAL DISTRIBUTION

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		T. M. Wintczak, Assignee	H6-27	
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Enclosure is the same as outgoing letter #9450222D, tmp 6-5813.

