0054518

| Change Number M-16-01-02 | Federal Facility Agreement and Consent Order Change Control Form<br>Do not use blue ink. Type or print using black ink. | Date January 15,2001 |
|---|---|---|

**Originator**
D. C. Smith
DOE/RICHLAND OPERATIONS-ENVIRONMENTAL RESTORATION PROJECT

**Phone**
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**Class of Change**

[ ] I - Signatories [X] II - Executive Manager [ ] III - Project Manager

**Change Title**

1) Extend Completion Date for Tri-Party Agreement Interim Milestone M-16-26C

**Description/Justification of Change**

The 100-HR-1 TPA milestones are applicable to Hanford's Environmental Restoration Program for the 100 Area Remedial Action. TPA milestone M-16-26C "Complete 10 waste sites and the process effluent pipelines in 100-HR-1" was extended to 5/31/01 (reference TPA change notice M-16-99-02).

During the closeout sampling process elevated arsenic and chromium contamination was found. Literature and historical photo searches were conducted to determine the source of the contamination. Results indicate that arsenic was not used within any process at the 100-HR Reactor Area. Historical documents indicate that lead arsenate was used as a pesticide on pre-Hanford agricultural land areas. Soil samples were collected from areas within the 100 HR area, outside of waste sites and in known agricultural areas. Results confirmed the presence of arsenic. The additional research, sampling and discussions with Regulators delayed closeout-sampling activities for approximately two months. Chromium was used in processes at the 100-HR Reactor Area. This issue was addressed previously at the 100D/DR Reactor Area, at first by attempting to remove the chromium-contaminated soils but the remedial action goal of 2.0 mg/kg could not be achieved. A leachate study was performed to identify the impact to ground water as a result of this elevated contamination (this RAG is for protection of ground water). The D/DR Reactor Area Study confirmed that the chromium would not leach into the ground water. RL proposed to Ecology that a leachate study, similar to that performed for the D/DR reactor area, be conducted for the HR Reactor Area; Ecology concurred with the proposal. The resolution of these two issues resulted in additional work and necessitated a four-month extension for completion of this workscope.

~~Strikethrough~~ indicates text to be removed, shading indicates text to be added:

| | | |
|---|---|---|
| M-16-26C | Complete Remediation and Backfill of 10 Liquid Waste Sites and Process Effluent Pipelines in the 100-HR-1 Operable Unit as defined in the Remedial Design Report/Remedial Action Work Plan for the 100 Area. | ~~5/31/01~~<br>9/30/01 |

**Impact of Change**

Milestone initiation and completion dates require changes. No other impacts can be identified. The intention is to have ongoing remediation continuing in the Hanford 100 Area Operable Units.

**Affected Documents**

Hanford Federal Facility Agreement and Consent Order Action Plan.
Remedial Design Report/Remedial Action Work Plan for the 100 Area.

**Approvals**

| | | | |
|---|---|---|---|
| W. Wade Ballard<br>DOE | 2/1/01<br>Date | ✓ Approved | ___ Disapproved |
| EPA | Date | ✓ Approved | ___ Disapproved |
| Michael A. Lee<br>Ecology | 2/7/01<br>Date | ✓ Approved | ___ Disapproved |

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