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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

01-ERD-047

MAR 15 2001

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

RECEIVED  
APR 11 2001

EDMC

Dear Mr. Sherwood:

## NOTIFICATION TO RENEGOTIATE MILESTONE M-13-26

This letter transmits the attached Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Request (CR) to defer Tri-Party Agreement Milestone M-13-26, "Submit Plutonium/Organic-Rich Process Waste Group (200-PW-1) Work Plan by June 30, 2001." A new milestone date is not specified, but it is proposed that this will be established through informal discussions with the U.S. Environmental Protection Agency (EPA) as specified in Article XVI. of the Tri-Party Agreement. This CR is being submitted in response to a suggestion sent on March 1, 2001, by EPA that the scope of work included in the Work Plan be expanded beyond the current focus on characterization at known waste disposal sites. The details regarding the full extent of the additional characterization and the best approach to dealing with the characterization under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 remedial investigation/feasibility study process has not been resolved with EPA.

The U.S. Department of Energy, Richland Operations Office wishes to initiate these discussions as soon as possible. You will be contacted by B. L. Foley to set up these discussions. We look forward to working with your staff to resolve these issues as quickly as possible and come to a mutually acceptable plan for completing this work.

If you should have any questions, please call Alex Teimouri, of my staff, on (509) 376-6222, or Mr. Foley, Environmental Restoration Division, on (509) 376-7087.

Sincerely,

Clifford E. Clark, Acting Program Manager  
Office of Regulatory Liaison

ERD:BLF

Attachment

cc: See page 2

MAR 15 2001

Mr. D. R. Sherwood  
01-ERD-047

-2-

cc w/attach:

J. H. Richards, CTUIR  
J. Price, Ecology  
R. F. Stanley, Ecology  
M. A. Wilson, Ecology  
D. R. Sherwood, EPA  
J. S. Hertzler, FHI  
O. S. Kramer, FHI  
T. M. Martin, HAB  
P. Sobotta, NPT  
M. L. Blazek, Oregon Energy  
R. Jim, YN

Administrative Record, H6-08 (200-PW-1)

cc w/o attach:

B. H. Ford, BHI  
M. J. Graham, BHI  
C. D. Wittreich, BHI  
L. C. Treichel, EM-442

<b>Change Number</b> M-13-01-01	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> March 14, 2001 Draft
<b>Originator</b> Bryan Foley, DOE		<b>Phone</b> 376-7087
<b>Class of Change</b> <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager		
<b>Change Title</b> Extension of the Interim Milestone M-013-26 for the 200-PW-1 Operable Unit RI/FS Work Plan		
<b>Description/Justification of Change</b>  Tri-Party Agreement Milestone M-013-26 "Submit plutonium/organic-rich process waste group (200-PW-1) work plan" was established under TPA Change Request M-13-00-01.  As described in the 200 Areas Remedial Investigation/Feasibility Study (RI/FS) Implementation Plan (DOE/RL-98-28, Rev.0) and consistent with other operable unit (OU) work plans, the focus of the RI for the 200-PW-1 OU is characterization of the vadose zone at representative sites with an emphasis on verifying the conceptual contaminant distribution model. One of the contaminants of concern that was disposed at waste sites within the 200-PW-1 Operable Unit is carbon tetrachloride. Unlike other contaminants, the physical properties of carbon tetrachloride (e.g. volatility, solubility) have influenced the migration of the contaminant into portions of the vadose zone far beyond the boundaries of known waste disposal sites. Based on the distribution of carbon tetrachloride in groundwater, there may be additional unidentified sources in the vadose zone. The U.S. Environmental Protection Agency (EPA) has requested that that the 200-PW-1 RI/FS Work Plan incorporate all investigations needed to answer questions surrounding the OU contaminants of concern, carbon tetrachloride being of particular concern.  EPA recently suggested accelerating the comprehensive carbon tetrachloride investigation strategy so that it can be incorporated into the 200-PW-1 RI/FS Work Plan. Planning for the remedial investigation of the carbon tetrachloride contamination plume that extends outside of the 200-PW-1 operable unit representative waste site-specific boundaries, as has been requested by the U.S. Environmental Protection Agency, was not budgeted as part of the FY 2001 work plan development scope. To include this additional more complex planning in the 200-PW-1 work plan, the M-13-26 milestone will need to be deferred.  <b>Interim Milestones Modified/Established by Approval of This Change Request</b>  Modifications to Existing Milestone  M-13-26      Submit plutonium/organic-rich process waste group (200-PW-1) work plan      6/30/2001TBD		
<b>Impact of Change.</b>  Revision of interim milestone date under M-13-26.		
<b>Affected Documents</b>  The Hanford Federal Facility Agreement and Consent Order, as amended		

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<b>Approvals</b>		
_____ DOE	_____ Date	____ Approved ____ Disapproved
_____ EPA	_____ Date	____ Approved ____ Disapproved
_____ Ecology	_____ Date	____ Approved ____ Disapproved