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TRI-PARTY AGREEMENT

Change Notice Number  
TPA-CN- 0817

TPA CHANGE NOTICE FORM

Date:  
07/05/2018

Document Number, Title, and Revision:  
DOE/RL-2011-03, Rev. 1, *Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex*

Date Document Last Issued:  
March 2016

Approved Change Notices Against this Document: TPA-CN-0739, -0756, -0780, -0790

Originator William Cox

Phone: 509-372-9345

Description of Change:

Figure 4.2 (and associated text) of DOE/RL-2011-03, Rev. 1, is modified to reflect an expanded on-site waste storage/management area, and to remove delineation of an area of contamination. Sections 4.3.1.2 and 4.3.1.3 are modified to reflect additional airborne emission controls and monitoring. Figure 5.1 (and associated text) is modified to reflect changes in project schedule.

T.K. Teynor and S.N. Schleif agree that the proposed change

DOE

Lead Regulatory Agency

modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement*.

Modifications include:

- Replaced Figure 4-2 with updated map and revised text in Section 4.2.4, Waste Handling, Storage, and Packaging.
- Revised text in Section 4.3.1.2, Airborne Emission Controls.
- Revised text in Section 4.3.1.3, Airborne Emission Monitoring.
- Replaced Figure 5-1 with an updated schedule and revised associated text in Section 5.7.1, Final Project Status.
- Added newly cited documents to Section 6, References.

Added text is denoted by double underline. Figures 4-2 and 5-1 are replaced entirely. The text changes on affected pages from approved change notices have been incorporated.

Note: Include affected page numbers: 4-11, 4-12, 4-19, 4-21, 5-1, 5-3, and 6-5

Justification and Impacts of Change:

During the course of PFP demolition activities contamination was spread beyond established radiological boundaries. This has necessitated re-arrangement and expansion of the on-site waste storage/management area, among other changes. Personnel, mobile offices, work entry control points, container transfer areas, materials, equipment, etc., needed to support the CERCLA removal action are being moved further away from the demolition zone to protect the health and safety of the workforce. These support structures as well as soil fixative makeup areas, waste staging areas, etc., are necessary to accomplish removal action activities and must be included in the PFP on-site area, as defined in 40 CFR 300.5, which states: "On-site means the areal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of the response action." As a result, the on-site area in Figure 4-2 has been expanded to encompass these additional support areas. In addition, the area of contamination denoted by small red-dashed boxes in Figure 4-2 has been deleted because this CERCLA term of art is not applicable to the PFP removal action.

Additional airborne emission controls and monitoring steps have been added to incorporate actions identified by Ecology and EPA to resolve HFFACO Article XXXII stop work invoked by the agencies in January 2018.

Figure 5-1 and Section 5.7.1 have been modified to reflect adjustment to the project schedule to account for delays in project completion caused by recovery actions associated with the December 2017 spread of contamination. Figure 5-1 also reflects a change to the project schedule to begin removal of the 236Z and 242Z slabs following the 200-WA-1 operable unit remedial investigation activities for the PFP area to avoid the potential for further impact to the 200-WA-1 activities.

Approvals:

	<u>July 19, 2018</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
DOE Project Manager	Date	
N/A		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA Project Manager	Date	
	<u>July 19, 2018</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology Project Manager	Date	

1 **Transuranic Mixed Waste.** TRU mixed waste may exist in the form of lead shielding and equipment.  
2 This waste, in all probability, will be solid; however, there could be residual liquid from decontamination  
3 activities or process-related systems.

4 **PCB Waste.** The paint used to coat many of the structure interior surfaces (e.g., walls and ceilings) may  
5 contain elevated levels of PCBs. Light ballasts and other hydraulic and electrical equipment may contain  
6 some level of PCBs. Consequently, some of the waste streams discussed previously may also be  
7 contaminated with PCBs.

8 **Nonregulated Bulk Waste.** Some nonregulated waste (e.g., structure rubble and radiologically released  
9 metal and concrete) is expected to result from demolition.

#### 10 **4.2.2 Waste Characterization and Designation**

11 The waste characterization requirements to support this removal action were developed as part of the  
12 DQO process. Waste generated will be characterized in accordance with the approved SAP  
13 (DOE/RL-2004-29) and the requirements of the receiving facility. Characterization may be accomplished  
14 through process knowledge, sampling/analysis, radiological surveys, etc.

15 The characterization criteria identified in the approved SAP (DOE/RL-2004-29) provide the rationale and  
16 strategy for conducting sampling and analysis activities in support of waste designation. They contain  
17 sampling, analysis, and radiological survey requirements to support waste designation and disposal  
18 decisions during all phases of the removal action project. The characterization data will be used to prepare  
19 waste profile summaries for evaluations against waste acceptance criteria to determine appropriate  
20 disposal options.

#### 21 **4.2.3 Waste Minimization and Recycling**

22 By using waste separation and segregation, waste generation can be kept to a minimum. Waste will be  
23 segregated for the removal action as it is generated, which will minimize the volume of regulated waste.  
24 Waste will be separated into the following categories: LLW, mixed, dangerous, TRU, TRU mixed, and  
25 nonregulated bulk.

26 Decontaminating agents and solutions will be selected to minimize quantities of hazardous substances for  
27 disposal and the volume of waste generated. Waste materials will be recycled, reused, or reclaimed  
28 whenever practicable and economically feasible.

#### 29 **4.2.4 Waste Handling, Storage, and Packaging**

30 All waste packaged for shipment from this removal action will be staged in waste storage areas pending  
31 further action or shipment and identified by signs reading "CERCLA WASTE MANAGEMENT AREA."  
32 Incompatible waste will be separated within the waste storage areas to prevent commingling of the waste.

33 All packaged waste staged will meet the ARARs identified in the Action Memorandum  
34 (DOE/RL-2005-13). Appropriate areas will be established in which waste is staged prior to shipment, if  
35 necessary. These waste staging and storage areas ~~either reside within the area of contamination or in the~~  
36 on-site waste storage/management area, as identified in Figure 4-2, including the areas adjacent to the  
37 west, east, northeast, and south of the outer PFP fence line and the North Outside Storage Area. To  
38 facilitate PFP project logistics, waste staging and storage areas may be relocated, as needed, within the  
39 on-site area. A means of tracking waste staging and storage areas will be maintained at PFP. These waste  
40 staging and storage areas are on-site and are necessary for implementation of the removal action.

41 Demolition will result in piles of bulk demolition waste. This waste will be processed and loaded  
42 concurrently with demolition activities. These piles of bulk demolition waste will be on or near the

- 1 associated structure footprint and positioned to allow equipment access to the structure undergoing  
2 demolition and equipment access to the bulk waste.
- 3 The CERCLA hazardous waste areas will be inspected weekly, and the universal waste and recyclables  
4 management areas will be inspected quarterly at a minimum to verify container integrity, legibility of  
5 markings and labels, and proper placement of signs. An inventory of the waste generated will be  
6 maintained. Before shipment to ERDF, the North Outside Storage Area, or an off-site location (e.g.,  
7 Perma-fix Northwest), the containers must be properly sealed and checked for leaks or other damage. At  
8 that time, a final inspection will be performed. Regulated waste from the removal action activities will be  
9 packaged per 49 CFR 100-185 regulations (or equivalent approved packaging guidelines for Hanford Site  
10 shipments). Samples and associated sample waste may be returned to PFP for disposition or sent to ERDF  
11 for disposal, if it meets the waste acceptance criteria.
- 12 Most contaminated soil and other remediation waste (e.g., structure rubble) that can be characterized as  
13 LLW and meeting ERDF Waste Acceptance Criteria will be shipped in bulk to ERDF using  
14 roll-off/roll-on containers that will have liners. Additionally, the trailer units will be equipped with tarps.  
15 If needed, other approved packages (e.g., burial boxes and/or sea-land containers) may be used for surface  
16 contaminated objects, bulk, and low specific activity shipments.
- 17 Waste not appropriate for bulk shipment (e.g., piping, transfer columns, or other processing equipment)  
18 will be cut to size, packaged, and shipped in non-bulk containers to meet the appropriate facility's waste  
19 acceptance criteria. The containers must also be weighed and visually inspected for leaks or other damage  
20 before the waste is transported.

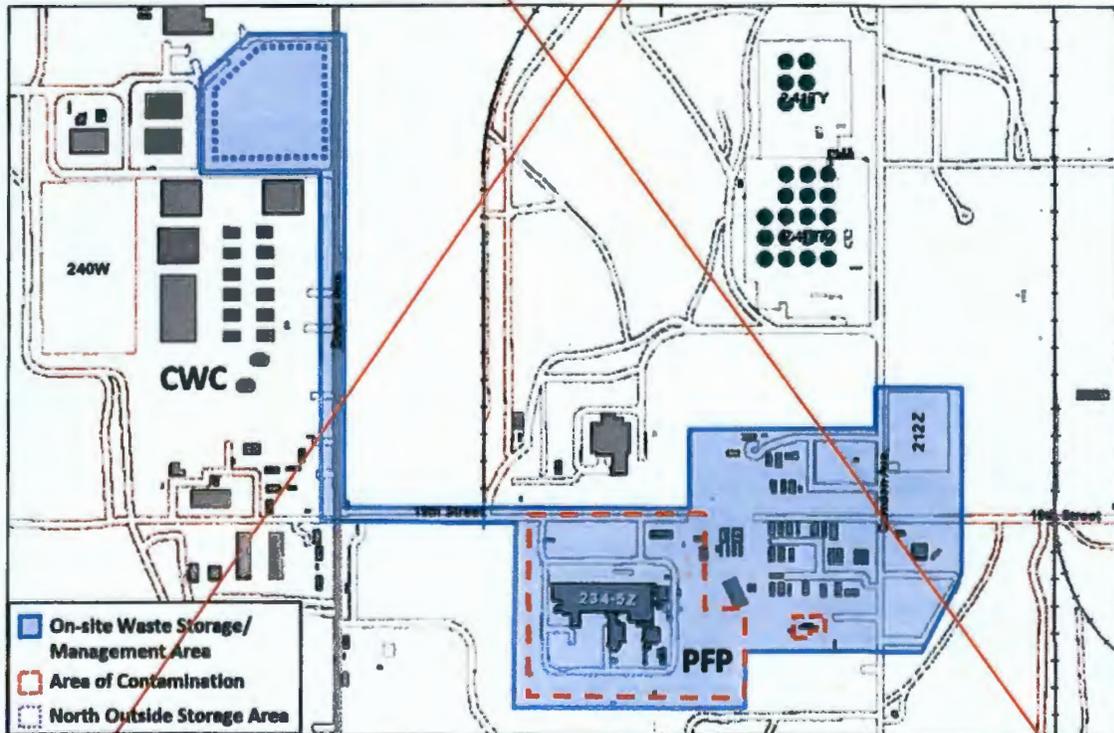


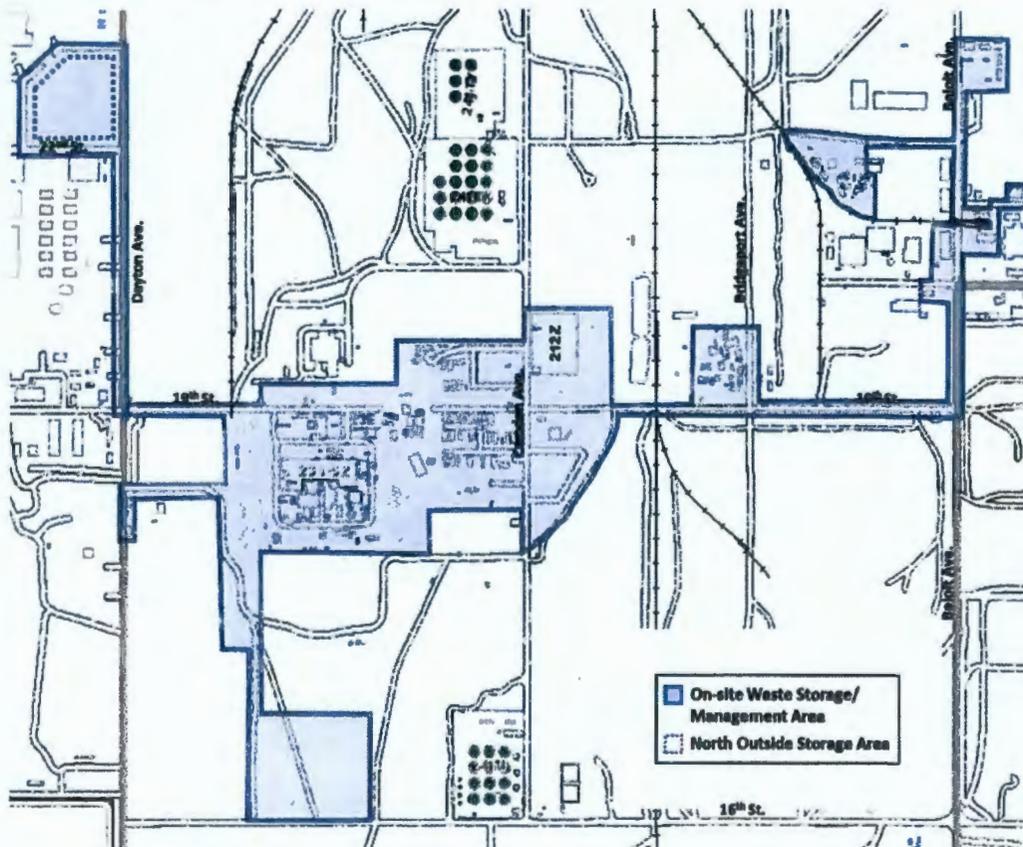
Figure 4-2. PFP Removal Action On-site Waste Storage/Management Area and Area of Contamination

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2 demolition and equipment access to the bulk waste.

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21

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Figure 4-2. PFP Removal Action On-site Waste Storage/Management Area and Area of Contamination

- 1 • Fixatives or cover material (e.g., soil, gravel, and plastic) will be applied to disturbed contaminated  
2 soils and debris associated with the PFP Complex demolition activities at any time field activities will  
3 be inactive for more than 24 hours. Additionally, if the sustained wind speed is predicted to be greater  
4 than 32 km/hr (20 mi/hr) overnight, based on the Hanford Meteorological Station forecast, fixative or  
5 cover material will be applied, as practicable.
- 6 • Before starting intrusive activities (such as isolating utilities and piping, or dismantling an exhaust  
7 system), removable contamination in the affected area(s) will be fixed, or reduced to ALARA.  
8 Measures such as decontamination solutions, expandable foam, encasement in grout, fixatives, or  
9 glove bags also will be used to the extent practicable to help minimize the spread of contamination.
- 10 • During open-air demolition, stabilized items identified as requiring special handling would be  
11 managed in a manner to minimize disturbance of the contamination. Methods of stabilization will be  
12 implemented prior to demolition to address void space issues and eliminate the need for excessive  
13 crushing, size reduction, or other actions that could lead to potential airborne releases.
- 14 • Applicable work documents for demolition and debris loadout activities will incorporate processes  
15 and controls needed to ensure key assumptions from the PFP air dispersion modeling reports remain  
16 valid (PNNL-27456, *Air Dispersion Modeling of Radioactive Releases During Proposed 234-5Z*  
17 *Building Demolition Activities* and PNNL-27464, *Air Dispersion Modeling of Radioactive Releases*  
18 *During Proposed 236Z Rubble Pile Activities*). DOE will inform Ecology of potential changes to  
19 work processes and controls which could deviate from meeting the key assumptions in advance of  
20 implementation. Ecology will be provided the opportunity to review and comment on such changes.
- 21 • Radioactive surface contamination or airborne concentrations from PFP work activities found beyond  
22 PFP radiological controlled areas (e.g., Radiological Buffer Area) above 10 CFR 835 posting criteria  
23 (i.e., 20 dpm/100 cm<sup>2</sup> removable alpha contamination or 12 Derived Air Concentration (DAC)-  
24 hr/week), or airborne concentrations exceeding 1.9x10<sup>-16</sup> Ci/m<sup>3</sup> of Am-241, 2.1x10<sup>-16</sup> Ci/m<sup>3</sup> of Pu-238,  
25 2.0x10<sup>-16</sup> Ci/m<sup>3</sup> of Pu-239/240, or 1.0x10<sup>-14</sup> Ci/m<sup>3</sup> of Pu-241 as measured every six months by the  
26 near field ambient air monitoring stations listed in Section 4.3.1.3 of this RAWP will be reported to  
27 Ecology (within 24 hours upon discovery) who will make further notifications as necessary.
- 28 • TRU waste containers will remain closed, except during packaging and waste inspection activities.
- 29 • Any vacuum cleaners and portable exhausters used for demolition activities will be equipped with  
30 appropriately tested nonstandard (HEPA-type) filters.

31 The following additional controls have been selected and could be implemented as practicable to  
32 minimize diffuse and fugitive emissions further:

- 33 • Planning for the special handling of stabilized items while minimizing risk of damage during  
34 handling
- 35 • Vacuum cleaners and/or portable exhausters used for demolition activities equipped with HEPA-type  
36 filters to provide point source or down draft contamination control
- 37 • Temporary exhausters with HEPA filters to provide alternate exhaust as practicable during  
38 decommissioning and preparation for final demolition

39 Temporary contamination control structures may be used as practicable with or without active portable  
40 HEPA-type filtered exhausters during portions of the demolition preparation activities to minimize  
41 worker exposure. HEPA-type is intended to reflect nonstandard application of HEPA abatement not

1 meeting engineered specifications of the applicable standards. No abatement credit is taken for  
2 “HEPA-type” devices.

3 **4.3.1.3 Airborne Emission Monitoring**

4 The quantification of radioactive air emissions and air monitoring has been identified as requirements for  
5 D4 activities. There are two components associated with airborne emissions monitoring at PFP. Point  
6 source monitoring (e.g., stacks, HEPA-filtered vacuums, portable HEPA-filtered exhausters, temporary  
7 exhausters) and diffuse and fugitive monitoring (temporary ambient air monitors, near facility monitors,  
8 radiological surveys). During the D4 activities at the PFP Complex, both components (point sources and  
9 diffuse and fugitive sources) will be monitored at the same time. Monitoring activities may include:

- 10 • Real time and periodic radiological monitoring using temporary ambient air monitors as prescribed by  
11 the Radiological Control organization (primary method for evaluating compliance with the action  
12 levels and void limits), with concurrence from the Environmental organization.

1 minor source criterion. If contamination levels over 2,000 dpm alpha/100 cm<sup>2</sup> (i.e., high surface  
2 contamination area) are inadvertently exceeded, a separate evaluation regarding emissions  
3 measurement will be conducted.

4 Portable HEPA-type filtered vacuums, portable HEPA-type filtered exhausters, and various types of  
5 containments will be used, as needed. A distinction between portable HEPA-type filtered exhausters and  
6 temporary HEPA filtered exhausters is intended. Portable exhausters are minor emission units that are  
7 easily set up for use and readily portable, being either hand carried or wheel mounted. Due to the nature  
8 of the activities involving use of the HEPA-type filtered air movers, measurable abated releases  
9 associated with these devices are not anticipated, and the near facility monitoring stations described  
10 below will be used to assess air emissions for the activities associated with these portable point sources.

11 Once demolition activities begin, worksite air monitoring will be the primary indicator of effectiveness of  
12 abatement and ALARA control methods during demolition activities. Worksite monitoring includes using  
13 temporary ambient air monitors (real time continuous air monitors with alarms, personnel samplers,  
14 ambient air samplers) and surveys. The worksite monitoring network will be established as directed by  
15 the Radiological Control organization, with concurrence from the Environmental organization, and will  
16 be focused around and in the established demolition zones. This monitoring network provides the primary  
17 emissions data used to ensure the limits set in the RWP are not exceeded. At a minimum, three (one  
18 upwind and two downwind) real time alpha continuous air monitors with alarms will be located at each  
19 demolition zone boundary.

20 In the event of a continuous air monitor alarm (not including spurious or radon related alarms), stored  
21 continuous air monitoring data will be retrieved by the project for trending and analysis. As entry into or  
22 near the radiological control areas will be necessary to access the continuous air monitor data, worker  
23 safety will be a factor in retrieving this information and therefore the process of deploying employees will  
24 be in line with current worker protection and ALARA considerations.

25 In addition to point source monitoring and worksite monitoring, the 200 West Area Near Facility  
26 Ambient Air Program stations nearest the PFP Complex (shown in Figure 4-3) provide a secondary layer  
27 of monitoring. These six stations (N433, N554, N975, N165, N155, and N555) do not provide real time  
28 data so their data will be used as indicators along with the worksite monitoring data for overall trending of  
29 potential diffuse and fugitive emissions. During periods of demolition and debris removal, no more than  
30 one of these six monitors will be allowed to be inoperative for more than 24 hours.

31 The Hanford Site perimeter monitoring provides the last layer of monitoring and is used to measure the  
32 diffuse and fugitive emissions from the Hanford Site.

33 The well-established Hanford Site protocol for emission monitoring will be followed, including  
34 Hanford Site perimeter ambient air data collection, sampling frequencies, sample analysis, and data  
35 reporting (DOE/RL-91-50, *Hanford Site Environmental Monitoring Plan*). This method will address the  
36 substantive requirements of WAC 246-247-75.

37 Demonstration of compliance with the 40 CFR 61.92 effective dose equivalent of 10 mrem/year limit is  
38 provided by the Radioactive Air Emissions Report for the Hanford Site.

## 5 Project Management

This chapter describes overall project management elements for the PFP removal action.

### 5.1 Project Team

The project team includes the individuals working to accomplish the removal action. Accordingly, the project team includes a DOE Project Manager representing the Lead Agency, an Ecology Project Manager representing the Lead Regulatory Agency and a Contractor Project Manager.

The DOE Project Manager is responsible for monitoring the technical/scope, cost, and schedule baselines through all phases of this removal action.

The Ecology Project Manager is responsible for regulatory oversight.

The Contractor Project Manager has overall responsibility and accountability for the performance of all activities associated with this removal action.

### 5.2 Project Cost and Schedule Tracking

The demolition of structures is part of the overall TPA (Ecology et al., 1989a) milestone M-083-00A completion schedule. This overall schedule is provided as Figure 5-1. This schedule is subject to acceleration or delay due to changes in priority as determined by the TPA (Ecology et al., 1989a) signatories and consistent with the TPA change processes.

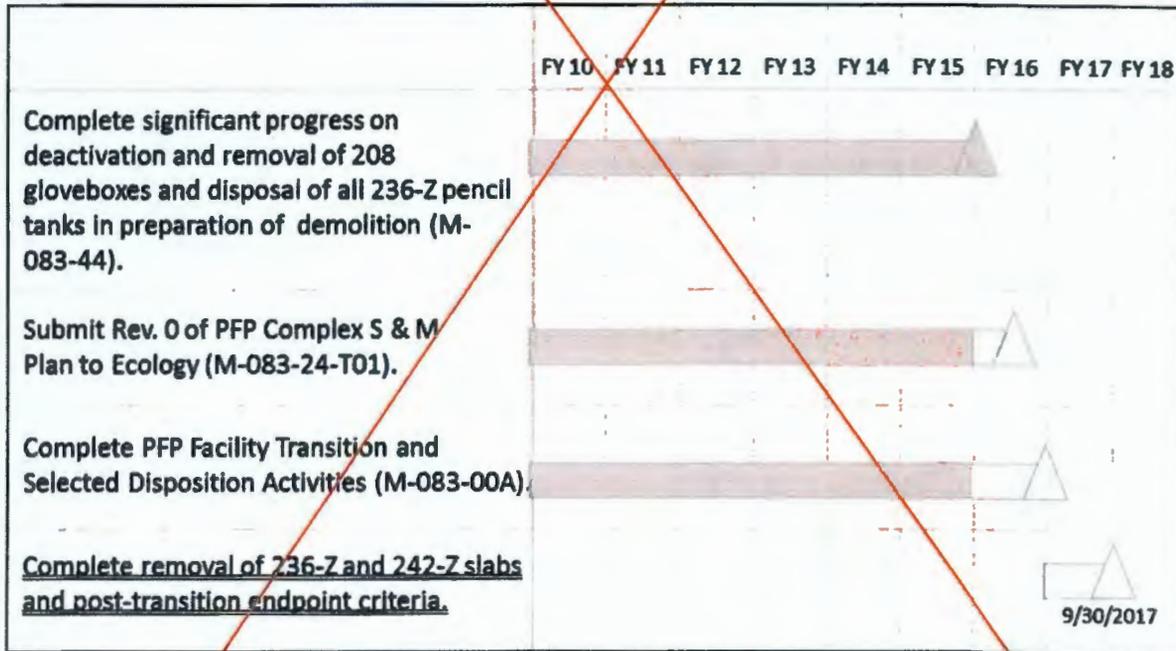


Figure 5-1. Project Schedule

Cost and schedule tracking is managed in accordance with Section 4 of the TPA (Ecology et al., 1989a).

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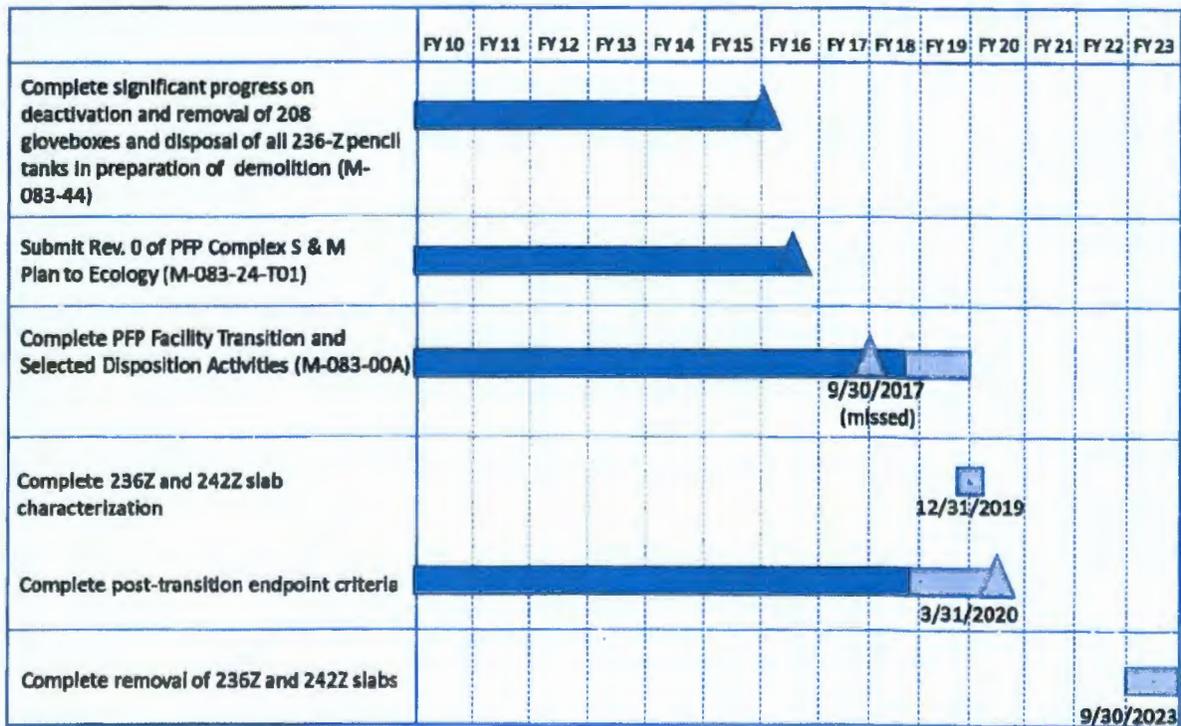


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Cost and schedule tracking is managed in accordance with Section 4 of the TPA (Ecology et al., 1989a).

1 SW-846, *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition; Final*  
 2 *Update IV-B*. QA activities will use a graded approach based on the potential impact on the environment,  
 3 safety, health, reliability, and continuity of operations. Other specific activities will include QA  
 4 implementation, responsibilities and authority, document control, QA records, and audits.

## 5 **5.7 Removal Action Closeout**

6 Removal action closeout will consist of a review to determine the final action status and validation that  
 7 the Action Memorandum (DOE/RL-2005-13) is completed, the S&M Plan is approved, property is turned  
 8 over to S&M, and appropriate documents are incorporated into the administrative record.

### 9 **5.7.1 Final Project Status**

10 To achieve the removal action end state, endpoints for dismantlement of the PFP Complex to  
 11 slab-on-grade must be achieved consistent with removal action objectives specified in the EE/CA.  
 12 Project closeout consists of endpoint criteria completion. The status of the performance measures at  
 13 completion of each project will be evaluated. At a minimum, a final updated schedule and cost report will  
 14 be completed and added to the project file. Any in-scope work not completed will be noted. Once a  
 15 structure is determined to have met pre-transition endpoint criteria, it will be ready to be transferred for  
 16 S&M activities.

17 Documentation required to support transition to a safe and stable S&M mode will be provided in a  
 18 turnover package at transition to S&M (completion of M-083-00A). The final turnover package will be  
 19 provided at the completion of all post-transition endpoint criteria by ~~September 30, 2018~~ March 31, 2020,  
 20 as identified in Figure 5-1. The turnover package will support future surveillances, audits, and final  
 21 disposition planning. It will be provided to the organization responsible for S&M of the PFP Complex  
 22 following completion of the above-grade removal action and be available for the final remedial action  
 23 planning. The following specific elements must be addressed in the turnover package:

- 24 • The as left condition of confined spaces (eliminated or sealed)
- 25 • Compliance with the asbestos standards
- 26 • The as left condition and location of remaining below-grade equipment
- 27 • Description of remaining industrial hazards
- 28 • The amount and locations of remaining radiological contamination/hazardous substances
- 29 • Final radiological surveys
- 30 • Work packages and plans
- 31 • Modified configuration management documents
- 32 • Photographs

### 33 **5.7.2 Records Disposition and Retention**

34 Records created during the execution of the PFP Complex removal action are managed in accordance  
 35 with Section 9.4 of the TPA Action Plan (Ecology et al., 1989b, *Hanford Federal Facility Agreement and*  
 36 *Consent Order Action Plan*).

- 1 *National Historic Preservation Act of 1966*, 16 USC 470, et seq. Available at:  
2 <http://www.achp.gov/docs/nhpa%202008-final.pdf>.
- 3 PNNL-27456, 2018, *Air Dispersion Modeling of Radioactive Releases During Proposed 234-5Z Building*  
4 *Demolition Activities*, Pacific Northwest National Laboratory, Richland, Washington.
- 5 PNNL-27464, *Air Dispersion Modeling of Radioactive Releases During Proposed 236Z Rubble Pile*  
6 *Activities*, Pacific Northwest National Laboratory, Richland, Washington.
- 7 RCW 43.21A, "Department of Ecology," *Revised Code of Washington*, Olympia, Washington.  
8 Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21A>.
- 9 RCW 70.94, "Washington Clean Air Act," *Revised Code of Washington*, Olympia, Washington.  
10 Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94>.
- 11 RCW 70.95, "Solid Waste Management—Reduction and Recycling," *Revised Code of Washington*,  
12 Olympia, Washington. Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.95>.
- 13 RCW 70.105, "Hazardous Waste Management," *Revised Code of Washington*, Olympia, Washington.  
14 Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.105>.
- 15 *Resource Conservation and Recovery Act of 1976*, 42 USC 6901, et seq. Available at:  
16 <http://www.epa.gov/epawaste/inforesources/online/index.htm>.
- 17 SW-846, 2007, *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition;*  
18 *Final Update IV-B*, as amended, Office of Solid Waste and Emergency Response,  
19 U.S. Environmental Protection Agency, Washington, D.C. Available at:  
20 <http://www.epa.gov/epawaste/hazard/testmethods/sw846/online/index.htm>.
- 21 *Toxic Substances Control Act of 1976*, 15 USC 2601, et seq. Available at:  
22 <http://www.epw.senate.gov/tsca.pdf>.
- 23 TPA-CN-254, 2009, *Change Notice for Modifying Approved Documents/Workplans in Accordance with*  
24 *the Tri-Party Agreement Action Plan Section 9.0 Documentation and Records:*  
25 *DOE/RL-2005-14, Revision 0, Removal Action Work Plan For The Plutonium Finishing Plant*  
26 *Above-Grade Structures: Facility Deactivation*, dated February 26, U.S. Department of  
27 Energy, Richland Operations Office, and U.S. Environmental Protection Agency, Richland,  
28 Washington. Available at:  
29 <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0912220122>.
- 30 TPA-CN-255, 2009, *Change Notice for Modifying Approved Documents/Workplans In Accordance with*  
31 *the Tri-Party Agreement Action Plan, Section 9.0, Documentation and Records:*  
32 *DOE/RL-2005-15, Revision 0, Removal Action Work Plan for the Plutonium Finishing Plant*  
33 *Above-Grade Structures: Ancillary Facility Demolition*, dated February 26, U.S. Department  
34 of Energy, Richland Operations Office, and Washington State Department of Ecology,  
35 Richland, Washington. Available at:  
36 <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=1109060935>.
- 37 WAC 173-160, "Minimum Standards for Construction and Maintenance of Wells," *Washington*  
38 *Administrative Code*, Olympia, Washington. Available at:  
39 <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-160>.
- 40 WAC 173-162, "Regulation and Licensing of Well Contractors and Operators," *Washington*  
41 *Administrative Code*, Olympia, Washington. Available at:  
42 <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-162>.
- 43 WAC 173-216, "State Waste Discharge Permit Program," *Washington Administrative Code*, Olympia,  
44 Washington. Available at: <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-216>.
- 45 216-020, "Policy Enunciated."