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Meeting Minutes
Inter Agency Management Integration Team (IAMIT)
EPA Conference Room
712 Swift Blvd., Richland
February 27, 1996

Appvl.: James E. Rasmussen for Date: 3/26/96
Linda K. McClain, RL (H4-83)
IAMIT Representative

Appvl.: Douglas R. Sherwood Date: 3/26/96
Douglas R. Sherwood, EPA (B5-01)
IAMIT Representative

Appvl.: Michael A. Wilson Date: 3/26/96
Michael A. Wilson, Ecology (B5-18)
IAMIT Representative

Prepared by Frank T. Calapristi Date: 3/26/96
Appvl.: Frank T. Calapristi
Frank T. Calapristi
Westinghouse Hanford Company

Attendees

Alexander, S. M.	Ecology	B5-18	Jaraysi, M. N.	Ecology	B5-18*
Arnold, L. D.	WHC	B2-35	McLaughlin, M.A.	WHC	B2-35
Bengtson, P. J.	WHC	B3-35*	Miera, F. R.	RL	A5-15*
Bowman, R. C.	WHC	H6-24*	Oates, K. J.	EPA	B5-01*
Calapristi, F. T.	WHC	B2-35*	Ruck, F. A.	WHC	H6-23*
Chatman, R. K.	BHI	H0-11*	Sherwood, D. R.	EPA	B5-01*
Davies, L	Ecology	B5-18	Roeder-Smith, L	JAC	*
Dunigan, P.F.X.	RL	A5-15*	Stanley, R.	Ecology-Olympia*	
Faulk, D. A.	EPA	B5-01	Teynor, G. T.	RL	S7-55
Guercia, R. F.	RL	S7-55*	Wilson, M. A.	Ecology	B5-18*
Haass, C. C.	RL	S7-51*	EPIC		H6-08*
Jackson, D. E.	RL	A5-15			

cc:

* W/Attachments



IAMIT27.FEB

**Inter Agency Management Integration Team
EPA Conference Room
712 Swift Blvd., Richland
February 27, 1996**

1. January Meeting Minutes

The January meeting minutes were approved by the IAMIT.

2. Dispute Resolution Status

M-41-09 Dispute: RL reviewed the current status (Attachment 1) and stated the dispute period ends on March 8, 1996. It was noted that Jack Donnelly (Ecology) has verbally agreed to a 30-day extension, if necessary. Agreement is needed for two tasks:

- M-41-09 Change Request
- Recovery Plan

In the subsequent discussion, agreement was reached between RL and Ecology to extend the dispute period by 30 days. A letter will be issued by both parties with a copy to EPA.

M-44-08 Dispute: RL reported the project managers were not able to reconcile the dispute with Ecology and it was agreed to elevate the dispute to the IAMIT meeting on March 26, 1996. The disagreement is focused on the Ecology position that RL missed the M-44-08 milestone in FY 1995. RL disagrees with the Ecology position since the criteria for TCR acceptance is contained in the TWAP previously submitted but not responded to by Ecology. A draft criteria is now being developed by RL and Ecology for the M-44-09 deliverables due in FY 1996 and for future TCR deliverables.

3. Discuss Change Requests

M-19-95-01: RL reviewed the history of the change request and the path forward (Attachment 2). RL noted in the change request that additional contracts may be awarded for treatment services. Consequently, there may be a multitude of small sub-contracts awarded to meet this milestone. In the follow-up discussion, Ecology asked RL for a plan to get final approval which will include Public Involvement.

Action: Draft plan to describe process for obtaining final approval of the change request including Public Involvement.

Resp.: Larry Arnold (WHC)

Due: March 1, 1996

P-09-96-01: "Update process flow of Part B Permit" (Attachments 3A and 3B) was distributed for regulator review and will be formally transmitted to Ecology and EPA.

P-06-96-01: "Expansion of Waste Management Capacity" (Attachment 4) was informally approved by RL and Ecology. The change request will be formally transmitted to Ecology within two weeks.

D-96-01: "Remove Graphic Workschedule in Appendix D (Attachment 5A and 5B) was informally approved by Ecology and EPA. Change request will be formally transmitted to the regulators within the next week.

E-96-01: "Update TPA Appendix E". The three parties agreed to remove personnel names from the Key Individual List and replace them with "Titles".

M-43-95-02: "Tank Farms Upgrade/314 Project" was approved by RL and Ecology.

4. TPA Paragraphs 148/149 Status

WHC reported there is a three party agreement to sponsor the following public meetings:

- March 6 - Focus meeting in Portland, OR
- March 19 - Workslope in Seattle to be held in the University Lutheran Church.

Also, on February 29, DOE will hold a meeting in Richland to brief the audience on planning and the assumptions for the FY 1998 budget.

A follow up meeting was discussed to cover TPA paragraphs 148/149 and the Community Relations Plan (CRP). The meeting will be scheduled after April 15, 1996. It was also agreed the St. Louis commitments will be reviewed at the March 26 IAMIT meeting.

AGENDA (REVISED 2/23/96)

IAMIT MEETING
FEBRUARY 27, 1996
EPA CONFERENCE ROOM
712 SWIFT BLVD., STE. 5
12:30 PM - 3:15 PM
(CHAIRPERSON: L. K. MCCLAIN)

- 12:30 pm APPROVAL OF JANUARY MEETING MINUTES
- 12:35 pm M-41-09 DISPUTE RESOLUTION STATUS (J. Clark, C. Haass, B. Harp)
M-44-08 DISPUTE RESOLUTION STATUS (J.F. Thompson, C. Haass)
- 1:30 pm DISCUSS CHANGE REQUESTS
- o M-43-95-02 Tank Farms Upgrade/314 Project
(M. Royack, C. Haass)
 - o M-19-95-01 Revise M-19-00 Milestones (R. Guercia, T. Teynor)
- 2:00 pm BREAK
- 2:15 pm CHANGE REQUESTS (cont'd)
- o P-09-96-01 Update Process Flow for Part B Permit/Closure Plan
(S. Price, C. Clark, M. Jaraysi)
 - o P-06-96-01 Expansion of Waste Management Capacity
(C. Clark, R. Bowman)
 - o D-96-01 Remove Graphic Workschedule From Appendix D
(R. Morrison)
 - o E-96-01 Update Appendix E "Key Individuals" of the TPA
(R. Morrison)
- 2:45 pm TPA Paragraphs 148/149 Status
(J. Yerxa, G. McClure, L. Davies, D. Faulk)
- 3:15 pm ADJOURN

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

FEBRUARY 27, 1996

EPA CONFERENCE ROOM
712 SWIFT BLVD, RICHLAND

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>F.T. CALAPRISTI</u>	<u>WHC / TPAI</u>	<u>B2-35</u>	<u>✓</u>
<u>L. ALHOLD</u>	<u>WHC / TPAI</u>	<u>32-55</u>	<u>✓</u>
<u>RFX Dumigan, Jr.</u>	<u>DOE - GAP</u>	<u>A5-15</u>	<u>✓</u>
<u>Felix R. Miera</u>	<u>DOE / RL</u>	<u>A5-15</u>	<u>✓</u>
<u>DALE JACKSON</u>	<u>DOE / RL / EAP</u>	<u>A5-15</u>	
<u>CAROLYN HAASS</u>	<u>DOE / RL / TWRS</u>	<u>57-51</u>	<u>—</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	
<u>R. Kim Chatman</u>	<u>BHF</u>	<u>2D27</u>	<u>✓</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	
<u>Margaret McLaughlin</u>	<u>WHC / TPAI</u>	<u>B2-35</u>	
<u>Kevin Outes</u>	<u>EPA</u>	<u>B5-01</u>	<u>✓</u>
<u>Marc Jarayci</u>	<u>Ecology</u>	<u>B5-48</u>	<u>✓</u>
<u>Roger Bowman</u>	<u>WHC</u>	<u>H6-24</u>	<u>✓</u>
<u>Rudy Guercia</u>	<u>RL / SWT</u>	<u>57-55</u>	<u>✓</u>

(ATTACHMENT 1)

SINGLE SHELL TANK STABILIZATION

MILESTONE M-41-09

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MILESTONE DESCRIPTION

- M-41-09 - “START INTERIM STABILIZATION OF 7 NON-WATCH LIST TANKS IN 241-S TANK FARM” (1/31/96)
- M-41-09-T01 - “COMPLETE INTERIM STABILIZATION OF 7 NON-WATCH LIST TANKS IN 241-S TANK FARM (4/30/97)

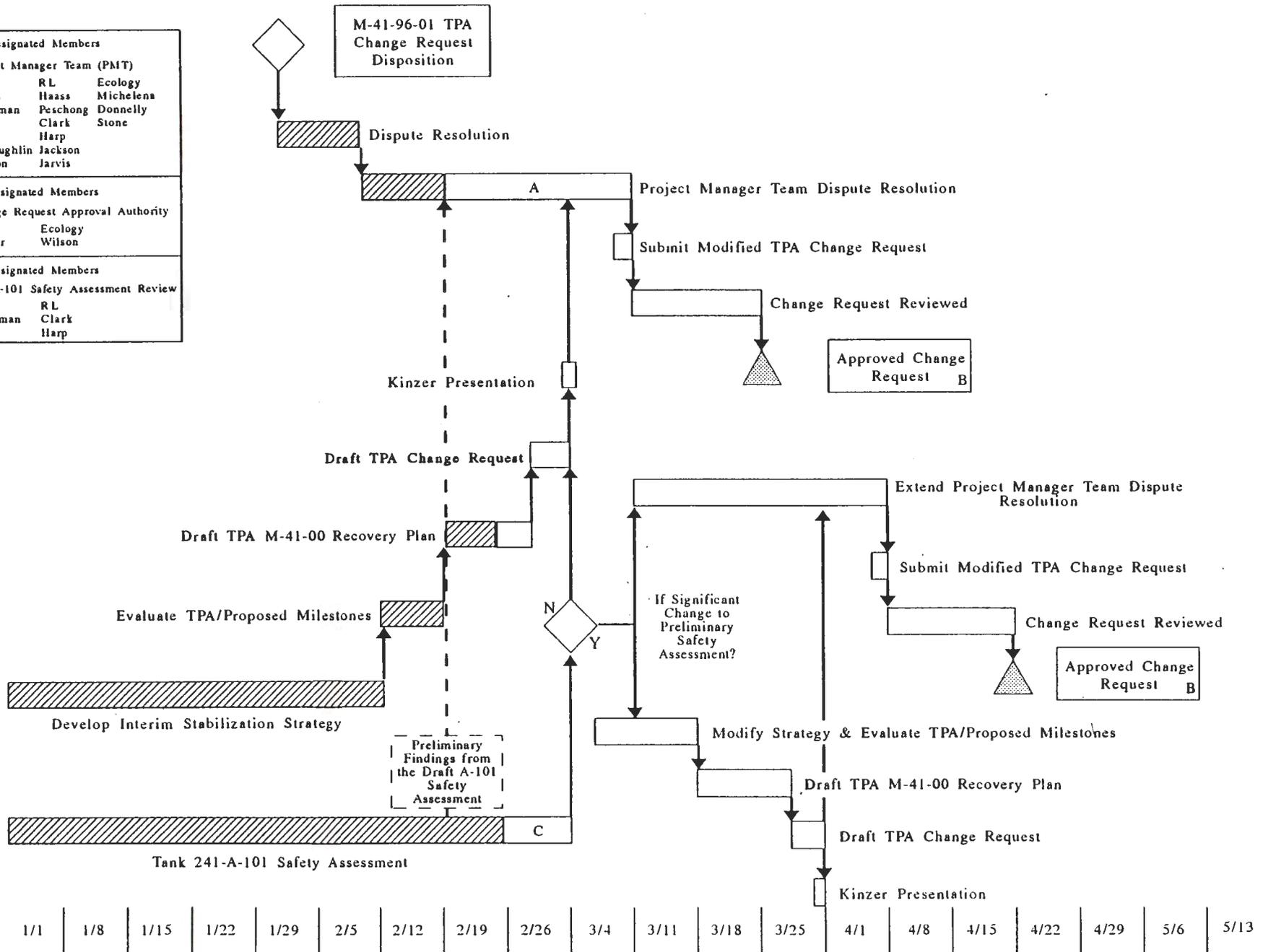
MILESTONE ASSESSMENT

- CHANGE REQUEST M-41-96-01 SENT TO WDOE - JANUARY 17, 1995
- WDOE REJECTED CHANGE REQUEST - JANUARY 30, 1996
- DISPUTE RESOLUTION INITIATED - FEBRUARY 7, 1996

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Interim Stabilization TPA Dispute Resolution Logic/Time Diagram

A Designated Members		
Project Manager Team (PMT)		
WHC	RL	Ecology
Wicks	Haass	Michelena
Engelman	Peschong	Donnelly
Fort	Clark	Stone
	Harp	
McLaughlin	Jackson	
Johnson	Jarvis	
B Designated Members		
Change Request Approval Authority		
RL	Ecology	
Kinzer	Wilson	
C Designated Members		
241-A-101 Safety Assessment Review		
WHC	RL	
Engelman	Clark	
Fort	Harp	



9603407 2540

TPA MILESTONE M-19

- **Before the Change Request**
- **After the Change Request**
- **Status / Path Forward**

February 27, 1996

TPA MILESTONE M-19 BEFORE THE CHANGE REQUEST

- **M-19-00 -- Complete WRAP MODULE II Construction and Initiate Operations by 9/30/99**
- **M-19-01 -- Complete WRAP MODULE II Construction by 9/30/98**
- **WRAP 2A Designated to Treat Contact Handled - Low Level Mixed Waste (CH-LLMW)**
- **Remote Handled TRU and Oversized Equipment and Boxed Waste to be Dispositioned via TPA Milestone M-33/M-90**
- **WRAP 2A Implementation Plan:**
 - **Begin treatment by September 30, 1999**
 - **Treat 1,644 cubic meters by September 30, 2002**
 - **246 cubic meters in FY 2000**
 - **575 cubic meters in FY 2001**
 - **822 cubic meters in FY 2002**

9457 211919

TPA MILESTONE M-19 AFTER THE CHANGE REQUEST

- **"Initiate Treatment of CH-LLMW by September 1999" Replaces the Milestone to Begin Operation of WRAP MODULE II by 9/30/99**
- **Minimum Waste Treatment and/or Disposal Quantities are Established:**
 - **Greater than or equal to the rate planned for WRAP 2A**
 - **At least 1,644 cubic meters by September 2002**
- **A Variety of Treatment Approaches are Endorsed**
 - **Commercial stabilization -- fixed unit price**
 - **Macroencapsulation of debris at 2706-T**
 - **Specialized/small scale treatment in WRAP I**
 - **Direct Disposal in compliance with applicable regulations**
 - **Other Commercial Treatment as Needed**
- **Interim Milestones to Track Progress of Commercial Contract and Direct Disposal**
- **Consistent With Federal Facilities Compliance Act**

TPA MILESTONE M-19 CHANGE REQUEST

STATUS:

- **Informal Agreement by Ecology and RL**
- **Formal Transmittal in Final Signoff at RL**

PATH FORWARD:

- **RL Formally Transmit Change Request**
- **Public Comment Period (45 days)**
- **Final Signoff by Ecology/EPA**

Change Number M-19-95-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 12/20/95
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Originator T. L. Baker	Phone (509) 376-5681
----------------------------------	--------------------------------

Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
--

Change Title Revise M-19 Milestones to Allow for Alternate Treatment and Direct Disposal Options for Low Level Mixed Wastes
--

Description/Justification of Change This change request proposes an alternative to constructing and operating the WRAP 2A facility on the Hanford site. The revised strategy would employ several parallel paths to accomplish the WRAP 2A mission for treating Contact Handled Low Level Mixed Waste. The new milestones will require that waste treatment and/or direct disposal begin by the same date planned for WRAP 2A and continue at a rate that equals or exceeds the cumulative throughput previously planned for WRAP 2A. A new major milestone establishes this treatment/disposal rate as a requirement through Fiscal Year 2002. <div style="text-align: right;">(Continued on next page)</div>
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Impact of Change This change request creates a new major milestone (M-19-00) which sets specific requirements for treating and/or disposing of at least 1,644 cubic meters of Contact Handled Low Level Mixed Waste by the end of FY 2002. The previous major milestone, "Complete WRAP Module II Construction and Initiate Operations" is replaced by interim milestone M-19-01, which requires that treatment and/or direct disposal of waste be initiated by the same date, September 1999. The previous milestone M-19-01, "Complete WRAP Module II Construction" is deleted. Additional interim milestones and target dates are established for the treatment and disposal of Contact Handled Low Level Mixed Waste.
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Affected Documents Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January, 1994, Appendix D (Table D, pages D-41 and D-42, and Action Plan Work Schedule, page 13 of 40).

Approvals <table style="width:100%; border: none;"> <tr> <td style="border: none;">_____</td> <td style="border: none;">_____</td> <td style="border: none;">___ Approved</td> <td style="border: none;">___ Disapproved</td> </tr> <tr> <td style="border: none;">DOE</td> <td style="border: none;">Date</td> <td style="border: none;">___ Approved</td> <td style="border: none;">___ Disapproved</td> </tr> <tr> <td style="border: none;">_____</td> <td style="border: none;">_____</td> <td style="border: none;">___ Approved</td> <td style="border: none;">___ Disapproved</td> </tr> <tr> <td style="border: none;">EPA</td> <td style="border: none;">Date</td> <td style="border: none;">___ Approved</td> <td style="border: none;">___ Disapproved</td> </tr> <tr> <td style="border: none;">_____</td> <td style="border: none;">_____</td> <td style="border: none;">___ Approved</td> <td style="border: none;">___ Disapproved</td> </tr> <tr> <td style="border: none;">Ecology</td> <td style="border: none;">Date</td> <td style="border: none;">___ Approved</td> <td style="border: none;">___ Disapproved</td> </tr> </table>	_____	_____	___ Approved	___ Disapproved	DOE	Date	___ Approved	___ Disapproved	_____	_____	___ Approved	___ Disapproved	EPA	Date	___ Approved	___ Disapproved	_____	_____	___ Approved	___ Disapproved	Ecology	Date	___ Approved	___ Disapproved	
_____	_____	___ Approved	___ Disapproved																						
DOE	Date	___ Approved	___ Disapproved																						
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EPA	Date	___ Approved	___ Disapproved																						
_____	_____	___ Approved	___ Disapproved																						
Ecology	Date	___ Approved	___ Disapproved																						

Description/Justification of Change (continued)

The new strategy will utilize a combination of several different approaches as described below:

- 1 Contracts with commercial firm(s) to provide stabilization of Contact Handled Low Level Mixed Waste (CH-LLMW) on a fixed unit price basis. This contract will provide required treatment for all of the waste streams originally designated for WRAP 2A, except for four small waste streams which will constitute less than two percent of the CH-LLMW projected for treatment in WRAP 2A. These small streams will be treated on site using laboratory scale equipment per approach 2 and/or via a second commercial contract for treating high mercury subcategory waste as discussed in approach 4. Contracts will be maintained (extended or recompeted) until no longer needed to meet regulatory requirements. The stabilization contract will require that treatment begin during September 1999, and continue for a base period of five years with five optional one-year extensions.
- 2 Onsite treatment in WRAP 1, 2706-T or another permitted TSD facility using macro-encapsulation and/or a small scale deactivation/stabilization capability. Certain waste streams, such as radioactive elemental lead and debris, will require Ecology/EPA concurrence with macro-encapsulation using sealed polyethylene containers. However, the commercial contract option can be utilized for any or all of these waste streams if regulator concurrence is not obtained or the commercial approach is determined to be more cost effective.
- 3 Direct disposal of certain waste streams in compliance with applicable regulations, without any additional treatment. Three waste streams are candidates for this option. In each case additional sampling and analysis will be required to demonstrate that the streams meet LDR treatment requirements for disposal in the RMW landfill. Preliminary testing has shown that these streams, previously categorized as requiring additional treatment, will meet LDR treatment standards. One of the streams, 183 H Basin Solidified Liquids, will require a variance for trace amounts of formic acid. This variance was also planned in order to treat 183 H Basin wastes in the WRAP 2A facility. Any of these waste streams that are found unsuitable for direct disposal by the regulators will default to the commercial contract for treatment.
- 4 In addition, additional contracts may be let for treatment services for small quantities of waste not within the scope of the WRAP 2A project or for high mercury waste (discussed in approach 1) which is not included in the stabilization contract.

The revised M-19 milestones use the WRAP-2A treatment plan (Ref: WHC-SD-W100-RD-001 Rev-1, *Waste Receiving and Processing Module 2A, Feed Specification*, November 1994) as the basis for the type and volume of waste to be treated and/or disposed. This basis was used in the WRAP-2A requirements document (Ref: WHC-SD-W100-FDC-001 Rev-2, *Functional Design Criteria, Waste Receiving and Processing Facility Module 2A, Project W-100*, October 1993) to establish a treatment throughput rate of 822 cubic meters per year. Facility implementation plans called for operating at 30% of capacity in the first year (FY 2000), 70% in the second, and 100% thereafter. Thus, the revised milestones are based upon annual treatment and/or disposal rates of 246 cubic meters in FY 2000, 575 cubic meters in FY 2001, and 822 cubic meters for FY 2002 and beyond until compliance is reached with the RCRA storage time limitation for land disposal restricted waste. The treatment and/or disposal requirements are stated on a cumulative basis as shown in Milestone M-19-00 below.

This new strategy will be consistent with the site treatment planning approach prescribed by the Federal Facilities Compliance Act and with offsite generator Site Treatment Plans approved prior to October 6, 1995.

Revised Milestones

~~M-19-00 Complete WRAP Module II Construction and Initiate Operations 9/30/1999~~

~~The WRAP Module II will include waste treatment capabilities to minimize land disposal of Low Level Radioactive Waste and Radioactive Mixed Waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.~~

M-19-00 Complete treatment/and or direct disposal of at least 1,644 cubic meters of Contact Handled Low Level Mixed Waste already in storage as of October 1, 1995 as well as newly generated Hanford Site low level mixed waste. September 2002

Cumulative treatment and/or direct disposal rates will be at least 246 cubic meters by the end of FY 2000, 822 cubic meters by the end of FY 2001, and 1,644 cubic meters by the end of FY 2002. These treatment/disposal rates are contingent upon Ecology/EPA approval of the variance from treatment standards for formic acid per M-19-02 below.

For the purpose of these M-19 series milestones, direct disposal of low-level mixed waste via use of the waivers and variances described below, will be considered equivalent to treatment.

M-19-01 Initiate Treatment of Contact Handled Low Level Mixed Wastes September 1999

Treatment of Contact Handled Low Level Mixed Waste will begin on or before September 30, 1999

~~M-19-01 Complete WRAP Module II Construction 9/30/1998~~

M-19-01-T01 Complete the determination of the level of NEPA documentation that will be required for commercial treatment contractor(s) May 1996

M-19-01-T02 Award a commercial contract for stabilization of Contact Handled Low Level Mixed Waste July 1996

M-19-01-T03 Complete all NEPA requirements related to the commercial contract for stabilization of Contact Handled Low Level Mixed Waste September 1997

M-19-02 Obtain Ecology/EPA decision regarding acceptability of a treatment variance for 183H Basin formic acid waste. September 1996

M-19-02A Submit petition to Ecology/EPA for variance from treatment standards for formic acid April 1996

This treatment variance for trace amounts of formic acid is required for both commercial stabilizat0n treatment of 183H sludge and crystalline solids, and direct disposal of 183H solidified liquids. The variance was also required

and planned for the WRAP 2A project. If the treatment variance is not granted, the 183H waste stream will require thermal treatment prior to stabilization and/or disposal.

M-19-03 Complete sampling and analysis to determine if Backlog Soils meet LDR treatment standards and/or MTCA risk based concentrations December 1996

If additional sampling and analysis demonstrates that backlog soils meet MTCA risk based concentrations, they will be disposed of in the non-regulated LLW landfill. If the soils fail MTCA risk based concentrations, but meet LDR treatment standards, they will be disposed in the RMW landfill. Otherwise, stabilization using the commercial contract will be required before disposing of the soils.

M-19-04 Obtain Ecology/EPA decision on the acceptability of the existing solidification treatment of 183H Solidified Liquids as LDR treatment December 1996

M-19-04A Submit justification for accepting existing solidification treatment of 183H Solidified Liquids to Ecology/EPA July 1996

Ongoing sampling and analysis of 183H Solidified Liquids indicates that the existing grouted waste form meets applicable RCRA stabilization treatment standards and all TCLP requirements. Additional sampling and analysis will be utilized to determine if the waste stream meets applicable standards for direct disposal in the RMW landfill.

PART B and CLOSURE PLAN PROCESS FLOWCHART REVISION

Incorporates changes developed to speed up process.

Emphasizes teaming of regulatory agency and DOE/contractor personnel in NOD workshops early in the process to resolve issues.

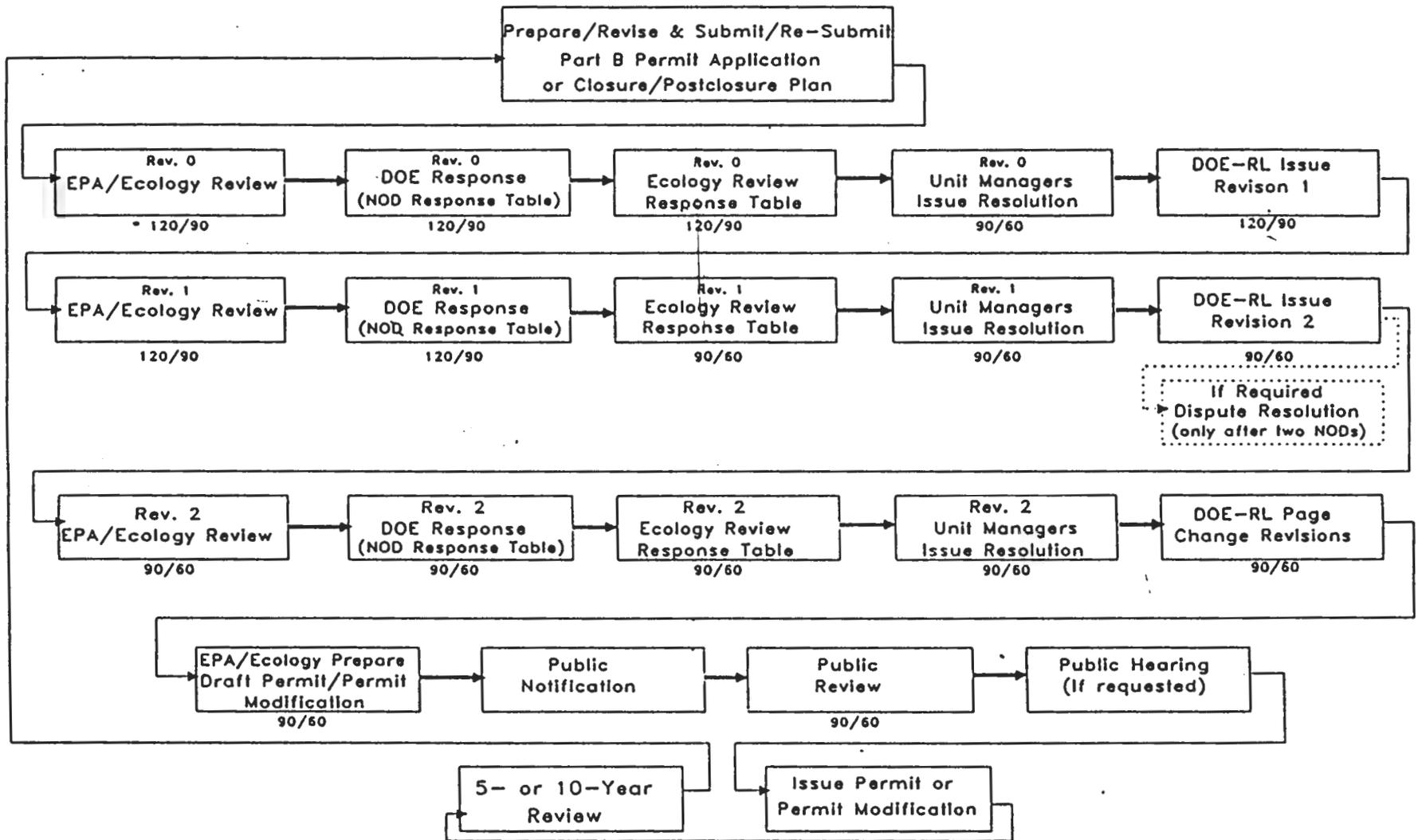
Part B Application preparation reduced by 23 months from 57 months to 34 months.

Closure Plan preparation reduced by 12 months from 40 months to 28 months.

The second revision to both documents has been deleted savings of \$150,000 to \$250,000 per revision.

STEPS for a Part B Permit Application	Original (days)	Proposed (days)
Submit Part B		
Ecology review (issue NODs)	120	120
DOE Response (NOD response table)	120	120
Ecology Review Response Table	120	120
Unit Managers Issue Resolution	90	---
NOD Workshop to Resolve Issues	---	240
DOE Issue Rev. 1	120	120
Ecology Review Rev. 1	120	60
Rev. 1 DOE Response (NOD Response Table)	120	---
Rev. 1 Ecology Review Response Table	90	---
Rev. 1 Unit Managers Issue Resolution	90	30
DOE Issue Rev. 2	90	---
Rev. 2 Ecology Review	90	---
Rev. 2 DOE Response (NOD Response Table)	90	---
Rev. 2 Ecology Review Response Table	90	---
Rev. 2 Unit Managers Issue Resolution	90	---
DOE-RL Page Change Revisions	90	60
Ecology Prepare Draft Permit Modification	90	60
Public Notification	---	---
Public Review	90	90
Public Hearing	---	---
Issue Permit Modification	---	---
Total days:	1,710	1,020
Total months:	57	34

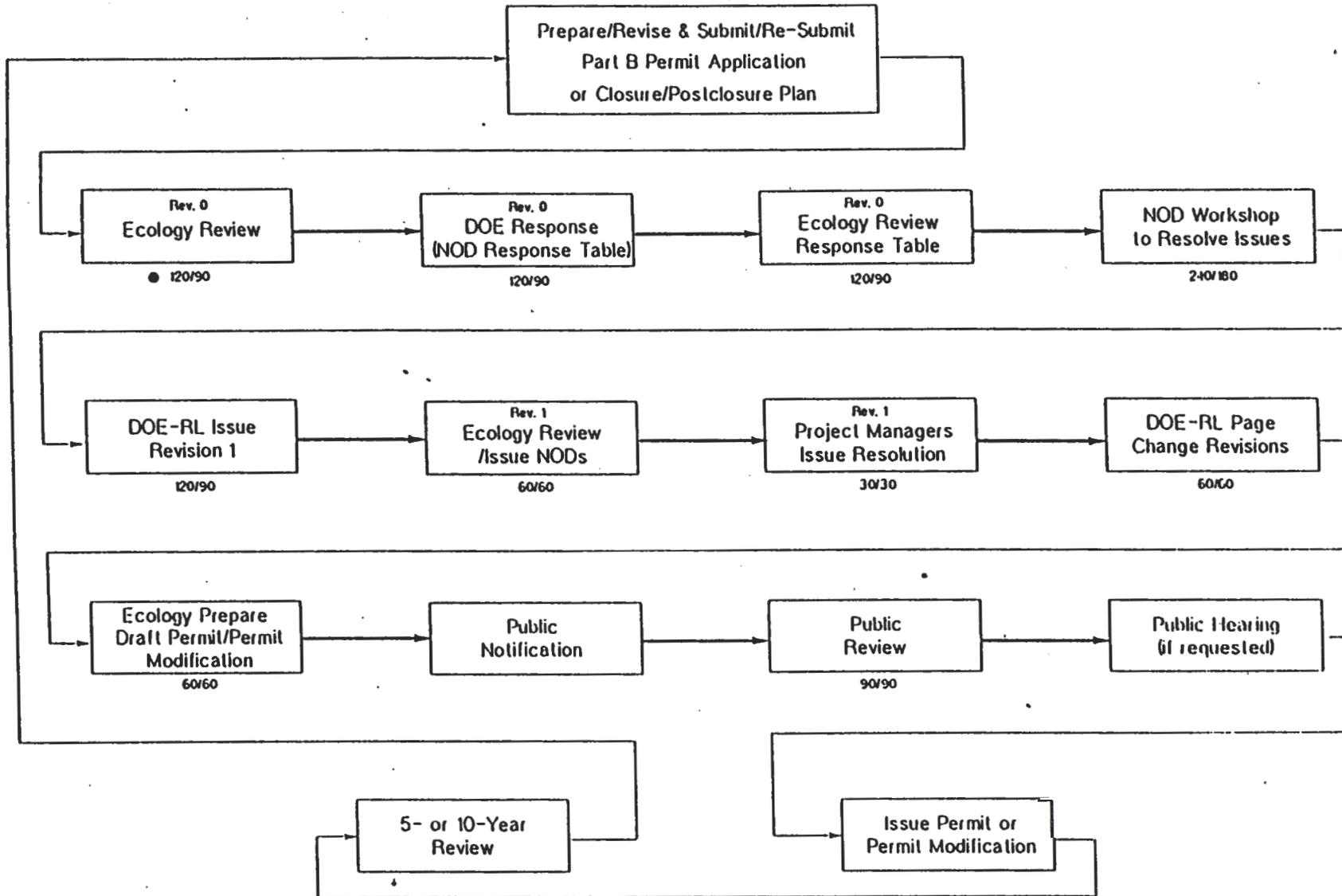
STEPS for a Closure Plan	Original (days)	Proposed (days)
Submit Closure Plan		
Ecology review (issue NODs)	90	90
DOE Response (NOD response table)	90	90
Ecology Review Response Table	90	90
Unit Managers Issue Resolution	60	---
NOD Workshop to Resolve Issues	---	180
DOE Issue Rev. 1	90	90
Ecology Review Rev. 1	90	60
Rev. 1 DOE Response (NOD Response Table)	90	---
Rev. 1 Ecology Review Response Table	60	---
Rev. 1 Unit Managers Issue Resolution	60	30
DOE Issue Rev. 2	60	---
Rev. 2 Ecology Review	60	---
Rev. 2 DOE Response (NOD Response Table)	60	---
Rev. 2 Ecology Review Response Table	60	---
Rev. 2 Unit Managers Issue Resolution	60	---
DOE-RL Page Change Revisions	60	60
Ecology Prepare Draft Permit Modification	60	60
Public Notification	---	---
Public Review	60	90
Public Hearing	---	---
Issue Permit Modification	---	---
Total days:	1,200	840
Total months:	40	28



• Permit or Closure/Postclosure
Days for Completion

DOE = U.S. Department of Energy
Ecology = State of Washington Department of Ecology
EPA = U.S. Environmental Protection Agency
NOD = Notice of Deficiency

Figure 9-2. Part B Permit Application and Closure/Postclosure Plan Process Flowchart.



● Permit or Closure/Postclosure
Days for Completion

DOE = U.S. Department of Energy
 Ecology = State of Washington Department of Ecology
 NOD = Notice of Deficiency

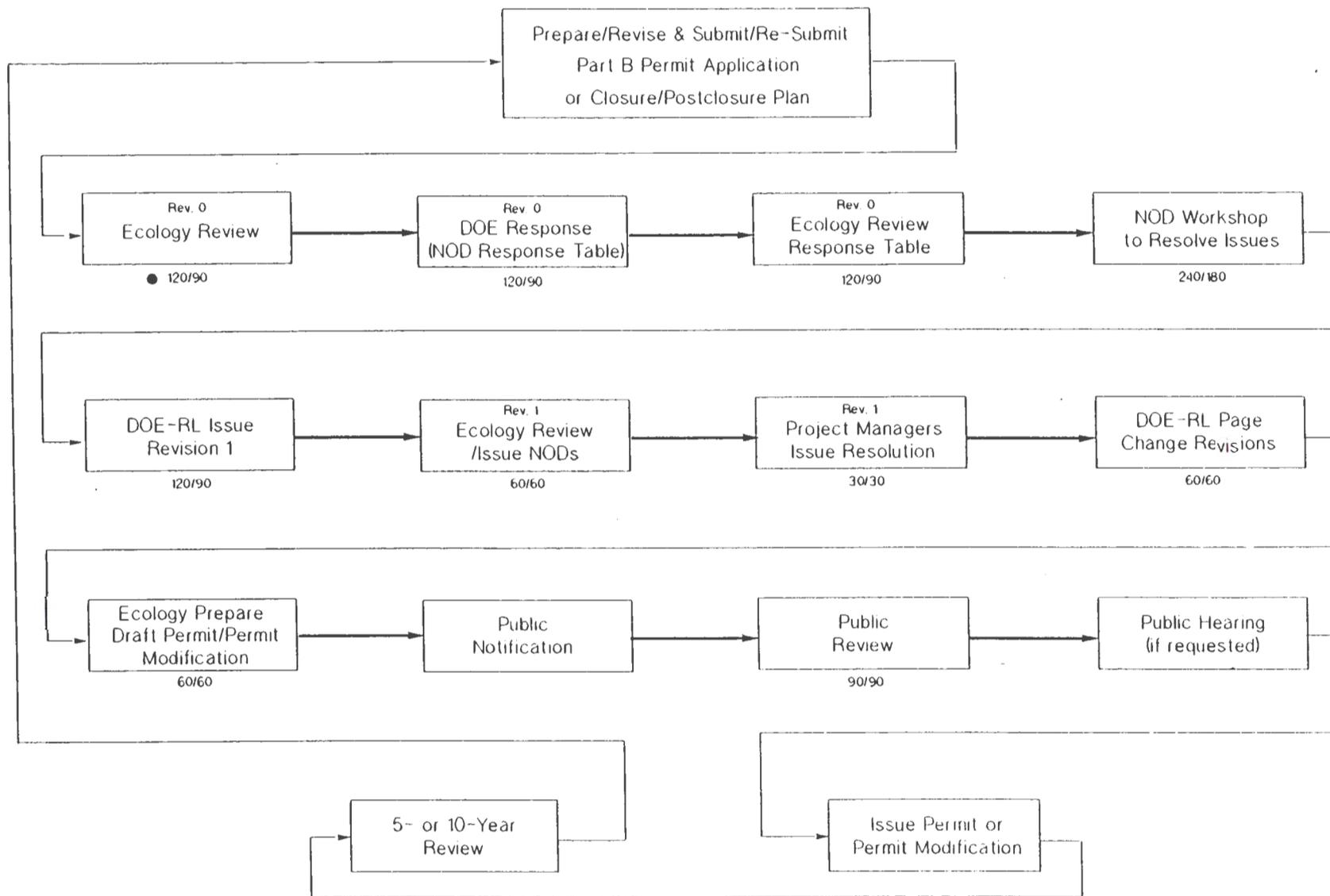
2002 2001 2000 1999 1998 1997 1996 1995 1994 1993 1992 1991 1990 1989 1988 1987 1986 1985 1984 1983 1982 1981 1980 1979 1978 1977 1976 1975 1974 1973 1972 1971 1970 1969 1968 1967 1966 1965 1964 1963 1962 1961 1960 1959 1958 1957 1956 1955 1954 1953 1952 1951 1950 1949 1948 1947 1946 1945 1944 1943 1942 1941 1940 1939 1938 1937 1936 1935 1934 1933 1932 1931 1930 1929 1928 1927 1926 1925 1924 1923 1922 1921 1920 1919 1918 1917 1916 1915 1914 1913 1912 1911 1910 1909 1908 1907 1906 1905 1904 1903 1902 1901 1900

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(ATTACHMENT 3B)

Change Number P-09-96-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 02/06/96
Originator Fred N. Ruck Moses N. Jaraysi		Phone (509) 376-9876 (509) 736-3016
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Update Process Flow Chart for Part B Permit Application and Closure/Postclosure Plan		
Description/Justification of Change <p>This is an updated Part B Permit Application and Closure/Postclosure Plan Process Flowchart. This updated flowchart incorporates changes that were developed to speed up the process and bring down the cost. The schedule for Part B's has been shortened by 23 months and for Closure Plans by 12 months. The second revision to both documents has been deleted, resulting in a significant cost savings. These time and cost savings result from emphasizing teaming of the regulatory agency and DOE personnel (in NOD workshops) early in the process to resolve issues.</p>		
Impact of Change This does not impact any Tri-Party Agreement interim or major milestone.		
Affected Documents Hanford Federal Facility Agreement Consent Order Action Plan Work Schedule and Figure 9-2.		
Approvals _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved DOE _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved EPA _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved Ecology		

96007 2558



● Permit or Closure/Postclosure
Days for Completion

DOE = U.S. Department of Energy
Ecology = State of Washington Department of Ecology
NOD = Notice of Deficiency

Change Number P-06-96-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 2/26/96
Originator Phone R. C. Bowman (WHC), C. P. Strand (WHC) 376-4876/376-8556		
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Expansion of Hanford Facility Waste Management Capacity Due to the Discontinuation of Process Operations		
Description/Justification of Change Add new Section 6.3.4 to the Hanford Federal Facility Agreement and Consent Order Action Plan: Section 6.3.4, "Expansion of Hanford Facility Waste Management Capacity Due to the Discontinuation of Process Operations" Many Hanford Site operations include systems that use chemical materials and/or solutions to perform required functions. When these systems are permanently removed from service, the chemical materials and/or solutions that no longer have a use may be considered a waste subject to the provisions of the dangerous waste regulations. For those systems that contain chemical materials and/or solutions that are considered waste, the components of the systems that contain this waste become subject to the Resource Conservation and Recovery Act (RCRA) permitting requirements of the Washington Administrative Code (WAC) 173-303 if the waste is managed for greater than 90 days. For facilities that have received a shut-down notice (facilities being transitioned), these system components (e.g., tanks and ancillary equipment) may be added to the Hanford Facility RCRA Dangerous Waste Part A Permit without providing notification required by WAC 173-303-281, provided that these components have no further waste management mission prior to RCRA closure or deactivation as addressed in Section 8.0.		
Impact of Change This change will result in time and cost savings realized through the reduction of document preparation associated with expanded waste management activities at facilities transitioning to closure.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Action Plan, Section 6 and Hanford Facility Notice(s) of Intent.		
Approvals		
J. E. Rasmussen DOE	_____ Date	___ Approved ___ Disapproved
_____ EPA	_____ Date	___ Approved ___ Disapproved
M. W. Wilson Ecology	_____ Date	___ Approved ___ Disapproved

DRAFT

Change Number D-96-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date February 27, 1996
Originator R. D. Morrison		Phone (509) 376-6574
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Remove Graphic Workschedule From Appendix D		
Description/Justification of Change <p>Delete the graphic workschedule from future versions of Appendix D of the Hanford Federal Facility Agreement and Consent Order (Agreement) (this workschedule appears on pages D-99 through D-138 of Revision 3 of the Agreement). See page 2 of this change request for specific language changes.</p> <p>Since 1989 numerous changes have occurred in the administration and management of the Agreement to seek the most efficient and effective methods. Among these changes has been the shift to a much more formal tracking and assignment of target dates within the formal listing of milestones and target dates in Appendix D of the Agreement. This system of formal establishment of very specific commitments has left the graphic presentation of commitments limited in it's purpose. Experience has shown that the graphic workschedule is not providing any significant value to the users of the Agreement and represents an unnecessary cost in the administration and maintenance of the Agreement. Therefore, this change request will discontinue the preparation and inclusion of a graphic workschedule in future printing of the Agreement.</p>		
Impact of Change <p>No impact is anticipated due to the very limited value which the graphic workschedule currently provides. Revised commitment management changes have rendered the workschedule unnecessary.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order, Appendix D, Workschedule.</p>		
Approvals _____ Date ___ Approved ___ Disapproved DOE _____ Date ___ Approved ___ Disapproved EPA _____ Date ___ Approved ___ Disapproved Ecology		

The following changes to the Agreement Action Plan are made:

Action Plan Publication (Action Plan Executive Summary)

An updated version of the Action Plan will be published periodically as agreed upon by the three parties. ~~The work schedule (contained in Appendix D) covers seven years, with the near term shown in detail.~~

1.1 PURPOSE

This action plan contains a work schedule (Appendix D), that is based on a rationale for setting priorities for work to be accomplished. This rationale is identified in Section 3.0. The work schedule identifies the ~~schedules~~ **target dates** and milestones to be met in implementing this plan. Requirements and standards under Washington's Dangerous Waste Regulations and RCRA for hazardous waste generation and transportation, as specified in Chapter 173-303 of the Washington Administrative Code (WAC) and Title 40, Code of Federal Regulations (CFR), Parts 262 and 263, are not addressed by this action plan. However, this does not relieve the DOE from meeting these requirements.

11.2 WORK SCHEDULE ~~FORMAT AND PREPARATION~~

~~The work schedule is depicted on a time scale format, and is seven years in length. The current calendar year is shown on a monthly time scale in sufficient detail to identify all target dates and milestones. The second year is shown on a quarterly scale, with the remaining five years on an annual scale. A listing of the interim milestones and target dates (grouped by major milestone) is provided in Appendix D.~~

11.3 WORK SCHEDULE UPDATES

The work schedule will be updated periodically ~~to expand the level of detail per Section 11.2.~~ In addition, any approved schedule changes (see Section 12.0 for formal Change Control System) will be incorporated at this time if not previously incorporated. Each update will be performed as agreed by the three parties.

ARTICLE XXX. ADDITIONAL WORK OR MODIFICATION TO WORK

101. In the event that additional work, or modification to work, including remedial investigatory work and/or engineering evaluation, is necessary to accomplish the objectives of this Agreement, notification and description to such additional work or modification to work shall be provided to DOE. DOE will evaluate the request and notify the requesting Party within thirty (30) days of receipt of such request of its intent and ability to perform such work, including the impact such additional work will have on budgets and schedules. If DOE does not agree that such additional work is required by this Agreement or if DOE asserts such additional work is otherwise inappropriate, the matter shall be resolved in accordance with the Dispute Resolution procedures of Part Two or Part Three of this Agreement, as appropriate. Field modifications, as set forth in the Action Plan, are not subject to this Article. Extensions of schedules may be provided pursuant to Article XL and Section 12.0 of the Action Plan.

102. Any additional work or modification to work determined to be necessary by DOE shall be proposed to the Lead Regulatory Agency by DOE and will be subject to review in accordance with the appropriate Dispute Resolution procedures of Part Two or Part Three of this Agreement, as appropriate, prior to initiation.

X 103. If any additional work or modification to work will adversely affect work schedules or will require significant revisions to an approved schedule, the lead regulatory agency project manager shall be immediately notified of the situation followed by a written explanation within seven (7) days of the initial notification. Requests for extensions of schedule(s) shall be evaluated in accordance with Article XL.

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ACTION PLAN

1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this action plan is to establish the overall plan for hazardous waste permitting, meeting closure and postclosure requirements, and remedial action under the Federal Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Washington State Hazardous Waste Management Act. All actions required to be taken pursuant to this agreement shall be taken in accordance with the requirements of all applicable Federal and State laws and regulations.

This plan describes the U.S. Environmental Protection Agency (EPA) and State of Washington regulatory integration, and the methods and processes to be used to implement the Hanford Federal Facility Agreement and Consent Order, hereinafter referred to as "the Agreement," among the State of Washington Department of Ecology (Ecology), the EPA, and the U.S. Department of Energy (DOE). The parties recognize that hazardous waste compliance, permitting, closure and postclosure action, and remedial and corrective action at the Hanford Site will require a fully integrated effort involving the Federal RCRA, CERCLA, and the Washington State Hazardous Waste Management Act. For purpose of this action plan, the term RCRA means the RCRA as amended and the Washington Hazardous Waste Management Act (HWMA).

X This action plan contains a work schedule (Appendix D), that is based on a rationale for setting priorities for work to be accomplished. This rationale is identified in Section 3.0. The work schedule identifies the schedules and milestones to be met in implementing this plan. Requirements and standards under Washington's Dangerous Waste Regulations and RCRA for hazardous waste generation and transportation, as specified in Chapter 173-303 of the Washington Administrative Code (WAC) and Title 40, Code of Federal Regulations (CFR), Parts 262 and 263, are not addressed by this action plan. However, this does not relieve the DOE from meeting these requirements.

Appendix A provides a definition of terms and acronyms as used in this action plan.

1.2 REGULATORY AUTHORITIES

This action plan and its appendices are binding and enforceable on all parties unless otherwise noted. The regulatory authorities of the EPA and Ecology currently include, but are not limited to, the following:

- The EPA: Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, and the Resource Conservation and Recovery Act of 1976 (RCRA), as amended
- Ecology: Hazardous Waste Management Act (HWMA), Chapter 70.105 Revised Code of Washington (RCW), as amended.

rationale and process by which waste management units at the Hanford Site will interface and be managed in accordance with the above-mentioned authorities. Section 6.0 describes the RCRA treatment, storage, and disposal unit processes and Section 7.0 describes past-practice unit processes in accordance with parts two and three of the Agreement respectively.

Section 8.0 describes the process for facilities transitions. Section 9.0 defines the documents to be generated under this action plan, the classification and listing of primary and secondary documents, and the records systems to be implemented to preserve and access the documentation. Section 10.0 describes the method and processes necessary for community relations and effective public involvement.

X Section 11.0 describes the purpose and format of the work schedule
X (Appendix D). In addition, Section 11.0 identifies the supporting plans that implement this action plan and the work schedule. Section 12.0 establishes a process for parties to propose and implement changes to elements of this Agreement, action plan, appendices, and supporting plans. Section 12.0 also addresses the process for minor field changes. Section 13.0 addresses requirements for management of discharges of liquid effluents to the soil column at Hanford.

- Hazardous substances identification and concentration
- Toxicity or health effects of the hazardous substances
- Potential for migration to receptors via all environmental pathways.

In addition, the following factors are used to determine priority:

- Available technology to investigate or remediate the operable unit
- Operation consideration (e.g., timing of decommissioning activities)
- Consideration to those operable units that include TSD units.

X Appendix C lists the current priority of operable units for investigation. This is based on currently available information and data. As new information and data become available, these priority assignments may be modified. The Hanford Operable Units Report provides the rationale and justification for the prioritization of the operable units. This priority is the basis for the work schedule (Appendix D). Procedures for modification of Appendix C are described in Section 12.0.

The highest priority operable units have been individually ranked and scheduled for investigation, whereas the remaining operable units have been prioritized into groups (see Appendix C). The single-shell tank operable units are unique and will be addressed separately as part of a supporting work plan.

3.4.2 Prioritization of Treatment, Storage, and Disposal Units

All TSD groups/units are subject to a permitting and/or closure process described in Section 6.0. Those TSD groups/units assigned to an operable unit will be prioritized in conjunction with past-practice priorities for purposes of investigation. The order in which permit applications or closure plans will be developed for the remaining TSD groups/units is based on consideration of the following criteria.

- Environmental Risk. The risk to public health and environment is the most important consideration. Any action that will significantly reduce the risk to public health and/or the environment will be considered the highest priority.
- Waste Minimization. Waste minimization is central to the goal of reducing environmental risks and bringing about environmental compliance for continuing operations and for new units at the Hanford Site. Therefore, the parties agree that Ecology's "Priority Waste Management Policy" (Ecology 86-07), established pursuant to CH. 70.105.150 RCW, shall be adhered to as guidance for purposes of establishing permitting priorities, in addition to evaluating proposed changes in operational procedures, and for the development and implementation of new waste management strategies. This policy defines the following prioritized actions: (1) waste reduction, (2) recycling, (3) treatment, (4) stabilization, and (5) land disposal.

- RCRA Section 3004(u). Section 3004(u) of RCRA provides authority for corrective action at solid waste management units at a facility seeking a RCRA permit. This includes units that received any solid waste, as defined in 40 CFR Part 261.2, including RCRA hazardous wastes or hazardous constituents, at any time. Hazardous constituents are those that are listed in 40 CFR Part 261 Appendix VIII. Those waste management units that will be addressed as RPP units under Section 3004(u) are so designated in Appendix C.
- RCRA Section 3004(v). RCRA Section 3004(v) specifies that corrective action to address releases from a RCRA facility will extend beyond the physical boundaries of the Site, to the extent necessary to protect human health and the environment. Section 3004(v) does not apply to releases within the boundary of the Hanford Site.
- RCRA Section 3008(h). RCRA Section 3008(h) is a broad corrective action authority that is applicable to the Hanford Site as long as RCRA interim status is maintained. It is more expansive than RCRA Section 3004(u), in that it can be used to address corrective action for any release of RCRA hazardous waste or constituents, including single-spill incidents, and can be used to address releases that migrate offsite.

5.2.3 CERCLA Past-Practice Unit

The CPP units include units that have received hazardous substances, as defined by CERCLA, irrespective of the date such hazardous substances were placed at the unit. Those waste management units that will be addressed as CPP units are so designated in Appendix C.

For the purposes of this action plan, it is necessary to distinguish between a CPP unit, a RPP unit, and a TSD unit. Any TSD unit, as defined in Section 5.2.1, will be classified as a TSD unit, rather than a CERCLA unit, even if it is investigated in conjunction with CPP units. The CPP and RPP units will be distinguished in accordance with Section 5.4.

5.3 MANAGEMENT OF TREATMENT, STORAGE, AND DISPOSAL UNITS

As previously stated, TSD units are identified in Appendix B. Any additional TSD units that are subsequently identified shall be added to Appendix B in accordance with the process described in Section 12.2.

X Unless closed in accordance with Sections 6.3.1 or 6.3.3, TSD units shall be permitted for either operation or postclosure care pursuant to the authorized State Dangerous Waste Program (173-303 WAC) and HSWA. Prior to permitting or closure of TSD units, DOE shall achieve (in accordance with the work schedule contained in Appendix D) and maintain compliance with applicable interim status requirements. All TSD units that undergo closure, irrespective of permit status, shall be closed pursuant to the authorized State Dangerous Waste Program in accordance with 173-303-610 WAC.

6.0 TREATMENT, STORAGE, AND DISPOSAL UNIT PROCESS

6.1 INTRODUCTION

This section discusses the requirements of RCRA and the State of Washington Hazardous Waste Management Act, Chapter 70.105 RCW, and pertains to all units that were used to store, treat, or dispose of RCRA hazardous waste and hazardous constituents after November 19, 1980; State-only hazardous waste after March 12, 1982; and units at which such wastes will be stored, treated, or disposed in the future, except as provided by 173-303-200 WAC.

A list of these units, or grouping of units, is provided in Appendix B. Section 3.0 identifies the criteria by which these units will be scheduled for permitting and closure actions.

Some of the TSD groups/units (primarily land disposal units) have been included in operable units, as discussed in Section 3.3, and will in most cases be investigated on a separate priority schedule, as discussed in Section 3.4. The information necessary for performing RCRA closures within an operable unit will be provided in coordination with various RFI/CMS documents. These documents will include a coordinated past practice site investigation/RCRA closure/RCRA corrective action approach in order to implement applicable regulations as discussed in Section 5.5.

Some of the TSD groups/units (primarily those located within large processing facilities) will be integrated with the disposition of the facility, and therefore closed in accordance with the process defined in Section 8.0. These units are those that have physical closure actions that need to be done in conjunction with the physical disposition actions in the facility (e. g. removal of structural components). Even though TSD units are closed in accordance with Section 8.0, applicable requirements defined in this section still apply (e.g. 6.5 Quality Assurance).

X Currently identified actions necessary to bring TSD units into compliance with Federal and State laws are identified in the work schedule (see Appendix D) including necessary interim milestones. These interim milestones are consistent with the major milestones for achieving interim status compliance requirements specified in Section 2.4. A schedule for completing interim status compliance actions is provided as part of Appendix D.

The RCRA land disposal restrictions (LDR) require that established treatment requirements be met prior to land disposal of hazardous wastes. While treatment capacity generally exists for the nonradioactive hazardous wastes which are subject to LDR, treatment is currently not available for the mixed wastes subject to LDR which require storage at the Hanford Site.

Ecology has received authorization from EPA to implement certain LDR provisions of RCRA pursuant to Section 3006 of RCRA. Accordingly, these authorized state provisions are effective in lieu of the Federal requirements. Both EPA and Ecology anticipate that Ecology will receive authorization for the additional LDR provisions in the future. EPA and Ecology intend to use the LDR provisions under M-26 and other HSWA provisions which have comparable state analogs that have not yet been authorized as an example of regulatory streamlining at the Hanford Site, by designating Ecology as the Lead Regulatory Agency for those provisions under applicable state law.

This includes review and approval of LDR Annual Reports, plans, and schedules for compliance with M-26-00. While EPA must retain legal authority over portions of the LDR which are not yet authorized to the state, EPA will not assign staff to oversee the routine completion of activities related to M-26-00. In the event that EPA involvement in a specific matter is requested by Ecology or is otherwise necessary, Ecology staff will brief EPA and EPA will become involved to the extent necessary to help resolve that specific matter. EPA and Ecology intend that such involvement on the part of EPA will be the exception, rather than the rule.

In accordance with Milestone M-26-00, DOE has submitted the "Hanford Land Disposal Restrictions Plan for Mixed Wastes," (LDR Plan) to Ecology, as the lead regulatory agency. This plan describes a process for managing mixed wastes subject to LDR at the Hanford Site and identifies actions which will be taken by DOE to achieve full compliance with LDR requirements.

X These actions will be taken in accordance with approved schedules specified in the LDR Plan and in the Work Schedule (Appendix D). The DOE will submit annual reports which shall update the LDR Plan and the prior annual report, including plans and schedules. The annual report will also describe activities taken to achieve compliance and describe the activities to be taken in the next year toward achieving full compliance. The LDR Plan and annual reports are primary documents, subject to review and approval by Ecology. Ecology also has approval authority for schedules in the LDR Plan and annual reports. Changes to approved final schedules must be made in accordance with the Change Control System described in Section 12.0.

6.2 TREATMENT, STORAGE, AND DISPOSAL PERMITTING PROCESS

The Hanford Site has been assigned a single identification number for use in State Dangerous Waste Program/RCRA permitting activity. Accordingly, the Hanford Site is considered to be a single RCRA facility, although there are numerous unrelated units spread over large geographic areas on the Site.

Since all of the TSD groups/units cannot be permitted simultaneously, Ecology and the EPA will issue the initial permit for less than the entire facility. This permit will eventually grow into a single permit for the entire Hanford Site. The Federal authority to issue a permit at a facility in this manner is found in 40 CFR 270.1(c)(4). Any units that are not included in the initial permit will normally be incorporated through a permit modification. At the discretion of Ecology and EPA, the permit revocation and reissuance process may be used.

The process of permit modification is specified in 173-303-830 WAC and 40 CFR 270.41. A permit modification does not affect the term of the permit (a permit is generally issued for a term of 10 years). Proposed modifications are subject to public comment, except for minor modifications as provided in 173-303-830(4) WAC and 40 CFR 270.42.

The process of revocation and reissuance is specified in 173-303-830 WAC and 40 CFR 270.41. Revocation and reissuance means that the existing permit is revoked and an entirely new permit is issued, to include all units permitted as of that date. In this case, all conditions of the permit to be reissued would be open to public comment and a new term (10 years in most cases) would be specified for the reissued permit.

Figure 6-1 depicts a flowchart for processing all operating permits for TSD groups/units and for processing postclosure permits for TSD groups/units that will close with hazardous wastes or constituents left in place. The permitting process applies to existing units, expansion of units under interim status, and new units (units that do not have interim status and must have a permit prior to construction).

Ecology shall normally be responsible for drafting permit conditions, including those related to HSWA requirements. Until the HSWA provisions have been delegated from EPA to Ecology through the authorization process, EPA will maintain final approval rights for those permit conditions pursuant to HSWA authority that have not been delegated. Therefore, certain conditions of the joint permit will be enforceable by Ecology, others will be enforceable by EPA, and some conditions will be enforceable by both agencies. The permit will identify which conditions are enforceable by each agency.

Disputes concerning any HWMA requirements, will be addressed in accordance with Article VIII of the Agreement.

Ecology will have the responsibility for drafting the permit and permit modifications for all TSD groups/units, ensuring that the Part B permit application is complete, and preparing the Notices of Deficiency (NOD) to the DOE.

The Part B permit application is a primary document, as defined in Section 9.1. The review procedures, as specified in Section 9.2.2, will be followed. In the event that issues cannot be resolved through the NOD process, the appropriate dispute resolution process can be invoked.

x Section 3004(u) of RCRA requires that all solid waste management units be investigated as part of the permit process. The statute provides that the timing for investigation of such units may be in accordance with a schedule of compliance specified in the permit. The parties have addressed the statutory requirement through the preliminary identification and assignment of all known past-practice units to specific operable units (see Section 3.0). These operable units have been prioritized and scheduled for investigation in accordance with the work schedule (Appendix D). It is the intent of all parties that this requirement be met through incorporation of applicable portions of this action plan into the RCRA permit. This will include reference to specific schedules for completion of investigations and corrective actions.

Ecology, the EPA, and DOE will follow all current versions of applicable Federal and State statutes, regulations, guidance documents, and written policy determinations that pertain to the permitting process, including postclosure permits, for TSD groups/units. Public participation requirements for permitting TSD groups/units will be met and are addressed in Section 10.0.

7.2 PRELIMINARY PROCESSES

Section 5.4 describes the rationale for managing operable units under either the CPP or the RPP category. The following processes apply to all past-practice units, regardless of whether they are classified as RPP or CPP units.

7.2.1 Site-wide Scoping Activity

An ongoing scoping activity will be conducted on a site-wide basis to maintain a current listing of operable unit boundaries and priorities. The primary vehicle for documentation of this activity will be the Waste Information Data System (WIDS). The WIDS, as described in Section 3.3, the Hanford Site Waste Management Units Report, and Appendix C of this Action Plan will be updated as additional information becomes available.

Although initial operable unit boundaries have been identified (Appendix C), the site-wide scoping activity may reveal additional or new information that could impact either the designation of individual units within operable units or the priority in which operable units will be managed. Any such changes will require the written concurrence of the assigned executive managers for the DOE and the affected lead regulatory agency. If both EPA and Ecology are affected by this action, the written concurrence of both agencies will be required in accordance with the modification procedures described in Section 12.2.

x The site-wide scoping activities will not impact the schedule of any other activities that are shown on the work schedule (Appendix D).

7.2.2 Operable Unit Scoping Activity

The operable unit scoping activity will be used to support the initial planning phase for each RI/FS (or RFI/CMS). Such activity and planning will result in an overall management strategy for each operable unit. In some cases, the operable unit management strategy may include facility dispositioning activities which will be integrated with this process as discussed under Section 8.3, "Decommissioning Process Planning". The DOE shall assemble and evaluate existing data and information about the individual waste management units within each operable unit. The data and information obtained during each operable unit scoping activity will be used to support the logic for the RI/FS (or RFI/CMS) work plan and, therefore, will be submitted as part of each work plan.

x This scoping activity is not intended to be a mechanism for generation of new information except for site survey and screening activities described in Section 7.3.2, but a thorough and complete evaluation of existing data. The schedule for submittal of the work plans, as specified in the work schedule (Appendix D), allows time for inclusion of the scoping activity.

The following is a list of specific scoping activities that will be addressed in each RI/FS (RFI/CMS) work plan:

- Assessment of whether interim response actions (IRA) or interim measures (IM) may be necessary. Such assessments will be documented as part of the work plan and may result in IRA or IM proposals

- Assessment of available data and identification of additional data needs
- Identification of potential ARARs (see Section 7.5)
- Identification of potential remedial responses.

7.2.3 Response to Imminent and Substantial Endangerment Cases

In the event that a situation is determined by the lead regulatory agency to represent an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance or hazardous waste or solid waste at an operable unit, the lead regulatory agency may require the DOE to immediately initiate activities to abate the danger or threat. CERCLA, RCRA and the HWMA all include provisions to quickly respond to such situations. If the operable unit is being managed under the CPP procedures, abatement in accordance with Section 106 of CERCLA and the applicable sections of the National Contingency Plan (NCP) (40 CFR Part 300) is preferred. If the operable unit is being managed under the RPP procedures, abatement under the provisions of the HWMA will be preferred. If the operable unit has not yet been assigned to either the CPP or RPP process, the EPA and Ecology will jointly choose an authority to address the imminent and substantial endangerment and will assign a lead regulatory agency to oversee DOE's efforts in completing the project.

The DOE may voluntarily submit a proposed method for abatement to the lead regulatory agency at any time. In cases involving a proposed method for abatement, the lead regulatory agency must approve the DOE's proposal prior to initiation of field work. The final selection of remedy for an abatement action shall be consistent, to the extent practicable, with the final selection of remedial action (for CPP units) or corrective measures (for RPP units) anticipated for the unit(s).

To expedite the cleanup process, neither the specified abatement method nor the proposal for abatement will be subject to the public comment process, except as required by law. However, the public will be kept informed of the status of the abatement process through other means as described in Section 10.0. After completion of all required abatement activity, the routine RI/FS or RFI/CMS process will be implemented, or continued, in accordance with the work schedule (Appendix D). The procedures specified in Section 7.3 or 7.4, respectively, will be followed.

7.2.4 Interim Response Action and Interim Measure Processes

If data or information acquired at any time indicate that an expedited response is needed or appropriate because of an actual or threatened release from a past-practice unit, the lead regulatory agency may require the DOE to submit a proposal for an expedited response at that unit. In addition, the DOE may submit such a proposal at any time, without request from the lead regulatory agency.

7.3.1 Preliminary Assessment/Site Inspection

The Preliminary Assessment/Site Inspection (PA/SI) is used as an initial screening step to determine whether a site should be nominated for the CERCLA NPL. For the Hanford Site, the information necessary to make that determination was provided to the EPA in 1987 by the DOE. The EPA determined that this information was functionally equivalent to a PA/SI. Based on that information, the Hanford Site was ranked and then nominated for inclusion on NPL on June 24, 1988 (Federal Register Vol. 53, No. 122, p. 23988). The four aggregate areas of the Hanford Site were officially placed on the NPL effective November 3, 1989 (Federal Register Vol. 54, No. 191, p. 41015). Therefore, there is no need to continue a PA/SI activity for the Hanford Site. Efforts will proceed directly to the scoping activities previously discussed and the RI/FS process. Figure 7-3 shows the normal sequence of events that occur during the RI/FS process.

7.3.2 Remedial Investigation/Feasibility Study Work Plan for Each Operable Unit

x The RI/FS work plan is a primary document, as described in Section 9.0. The lead regulatory agency will provide comments on each RI/FS work plan that is submitted by the DOE. The RI/FS work plan will be made available for public comment for a period of 30 days, in accordance with the procedures described in Section 10.0. On a case-by-case basis, the project managers may agree to extend the comment period to 45 days. Following public comment, the lead regulatory agency will require the DOE to make appropriate changes to the RI/FS work plan, based on review of public comments received, and will approve the work plan. At that time, the work schedule (Appendix D) may need to be modified to accurately reflect the RI/FS work plan schedule. Such modification will be made in accordance with the procedures described in Section 12.0. At that time, the lead regulatory agency will publish the RI/FS schedule, in accordance with CERCLA Section 120(e)(1) and as specified in Article XVII of the Agreement. As additional information becomes available during the RI/FS process, the RI/FS work plan may be revised.

The RI/FS work plan will include or reference seven interrelated components as they pertain specifically to RI/FS activities at any given operable unit. These components, prepared in accordance with current EPA guidance documents, include the following:

- Technology
- Quality assurance/quality control
- Project management
- Sampling and analysis
- Data management
- Health and safety
- Community relations.

In some cases, treatability investigations at an operable unit will involve minimal activity. In other cases, treatability investigations at a previously investigated operable unit may be used at other operable units whenever warranted by site-specific conditions. When these situations exist, it is possible to expedite the RI/FS process by combining the RI Phase I activity with the RI Phase II activity. Any decision to combine the RI Phases I and II must be agreed to in writing by the lead regulatory agency, in accordance with the procedures described in Section 12.0, unless it was agreed to during the initial approval of the RI/FS work plan.

X The actual schedule for conducting the RI Phase I will be specified for each operable unit in the work schedule (Appendix D). The RI Phase I report is a secondary document, as described in Section 9.0. In cases where the RI Phases I and II have been combined, a RI Phases I and II report shall be prepared by the DOE and submitted to the lead regulatory agency as a primary document, as described in Section 9.0.

7.3.4 Feasibility Study--Phase I

The FS Phase I will be conducted by the DOE for the purpose of developing an array of alternatives to be considered for each operable unit. The DOE will develop the alternatives for remediation by assembling combinations of technologies, and the media to which the technologies could be applied, into alternatives. The alternatives will address all contamination at each operable unit.

The FS Phase I process will begin during the RI Phase I process when sufficient data are available. Such data will consist of analytical data obtained during the RI, as well as historical information regarding waste management units at the operable unit.

Because of the direct relationship between FS Phase I (development of alternatives) and FS Phase II (screening of alternatives--Section 7.3.5), the two phases will be conducted concurrently. This approach should save several months in the RI/FS process, without sacrificing quality of work. Since Phases I and II of the FS will be finished at the same time, the information from both phases will be submitted to the lead regulatory agency in a single FS Phases I and II report.

7.3.5 Feasibility Study--Phase II

The FS Phase II will be a screening step to reduce the number of treatment alternatives for further analysis while reserving a range of options. Screening will be accomplished by considering the alternatives based on effectiveness, implementability, and cost factors. Cost may be used as a factor when comparing alternatives that achieve acceptable standards of performance.

Innovative technologies will be carried through the screening process if they offer the potential for better treatment performance or implementability, fewer or less adverse impacts than other available technologies, or lower costs than demonstrated technologies with comparable environmental results.

As stated in Section 7.3.4, Phases I and II of the FS will be conducted concurrently. Therefore, the FS Phase II will begin as soon as sufficient

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X data from the RI Phase I is obtained. The actual schedule for conducting the FS Phases I and II will be specified for each operable unit in the work schedule (Appendix D). The FS Phases I and II report, is a primary document as described in Section 9.0.

7.3.6 Remedial Investigation--Phase II

This second phase of the RI will focus on collecting data sufficient to substantiate a decision for remedy selection. A supplemental work plan to the RI/FS work plan will be prepared to cover the RI Phase II activities. This work plan will be placed in the Public Information Repositories. After a literature search is conducted to consider the applicability of various remediation alternatives, treatability investigations may be performed for particular technologies. Additional field data will be collected as needed to further assess alternatives. Treatability investigation work plans will be submitted by DOE to the lead regulatory agency when the investigation is related to a specific operable unit per the RI/FS work plan. All treatability investigation work plans shall be assigned to an operable unit for which a lead regulatory agency has been identified. The lead regulatory agency shall determine on a case-by-case basis whether a treatability investigation work plan is a primary document or a secondary document (see Section 9.1) during development of the applicable RI/FS (or RFI/CMS) work plan.

Upon completion of the treatability investigation, DOE shall submit a treatability investigation report to the lead regulatory agency, documenting the findings of the investigation and applicability to the remedial action project. The treatability investigation report is a secondary document (see Section 9.1).

X The actual schedule for conducting the RI Phase II will be specified for each operable unit in the work schedule (Appendix D). The RI Phase II report is a primary document as described in Section 9.0. Where the RI Phase I and Phase II activities have been combined (see Section 7.3.3), the resulting RI Phases I and II report would also be a primary document.

7.3.7 Feasibility Study--Phase III and Proposed Plan

The treatment alternatives passing through the initial screening phases will be analyzed in further detail against a range of factors and compared to one another during the FS Phase III. This final screening process will begin once the FS Phases I and II report is approved by the lead regulatory agency.

The determination for the preferred alternative will be made based on the following general criteria:

- Does the alternative protect human health and the environment and attain ARARs
- Does the alternative significantly and permanently reduce the toxicity, mobility, and volume of hazardous constituents
- Is the alternative technically feasible and reliable.

In addition, the costs of construction and the long-term costs of operation and maintenance will be considered.

X

The actual schedule for conducting the FS Phase III will be specified for each operable unit in the work schedule (Appendix D) and integrate any planned facility dispositioning per paragraph 8.3. A FS Phase III report will be prepared by the DOE documenting the results of the RI/FS. The FS Phase III report is a primary document as described in Section 9.0.

With consideration of all information generated through the RI/FS process, the DOE shall prepare a proposed plan. This proposed plan is required by CERCLA Section 117(a). The proposed plan must describe an analysis of the feasible alternatives and clearly state why the proposed remedy is the most appropriate for the operable unit, based on written EPA guidance and criteria. Once the lead regulatory agency has concurred on the proposed plan, and the FS Phase III report, the documents will be made available for public review and comment in accordance with the procedures described in Section 10.0. Public review of the proposed plan will provide opportunity for consideration of two additional criteria in preparation of the record of decision. These criteria are State and community preference or concerns about the proposed alternatives.

7.3.8 Record of Decision

After the public comment period on the FS Phase III report and the proposed plan has closed, the record of decision (ROD) process will begin. The ROD will be prepared by the lead regulatory agency and will describe the decision making process for remedy selection, and summarize the alternatives developed, screened, and evaluated in accordance with CERCLA and the NCP. The lead regulatory agency is responsible for reviewing the comments received and will prepare a responsiveness summary that will accompany the ROD. Although all of the RI/FS and preliminary determinations through the process of drafting the ROD will be the responsibility of the lead regulatory agency for a given operable unit, the ROD must be signed by the EPA. The ROD will become part of the administrative record for each operable unit. The lead regulatory agency shall continue its role after issuance of the ROD, including oversight of the remedial design and remedial action phases, as described below.

7.3.9 Remedial Design Phase

Following issuance of the ROD, the remedial design (RD) phase will be initiated in accordance with a schedule agreed to by the project managers. Milestone change requests shall be processed in accordance with Section 12.0. Since any necessary treatability investigations have been performed during the RI Phase II, no additional investigations will be necessary, unless required by the lead regulatory agency. A number of items will be completed during the RD phase, including but not limited to the following:

- Completion of design drawings
- Specification of materials of construction
- Specification of construction procedures
- Specification of all constraints and requirements (e.g., legal)
- Development of construction budget estimate

- Preparation of all necessary and supporting documents.

x An RD report will be prepared that includes the designs and schedules for construction of any remediation facility and development of support facilities (lab services, etc.). The RD report is a primary document as described in Section 9.0. The schedule for conducting the RD phase will be specified for each operable unit in the work schedule (Appendix D).

7.3.10 Remedial Action Phase

The remedial action (RA) phase will be initiated in accordance with a schedule agreed to by the project managers. Milestone change requests shall be processed in accordance with Section 12.0. The RA phase is the implementation of the detailed actions developed under the RD. The RA will include construction of any support facility, as specified in the RD report, as well as operation of the facility to effect the selected RA at that operable unit.

x An RA work plan will be developed for each operable unit detailing the plans for RA. The RA work plan is a primary document as described in Section 9.0. The schedule for conducting the RA phase will be specified for each operable unit in the work schedule (Appendix D).

Upon satisfactory completion of the RA phase for a given operable unit, the lead regulatory agency shall issue a certificate of completion to the DOE for that operable unit. At the discretion of the lead regulatory agency, a certificate of completion may be issued for completion of a portion of the RA phase for an operable unit.

7.3.11 Operation and Maintenance

The operation and maintenance (O&M) phase will be initiated at each operable unit when the RA phase has been completed. This phase will include inspections and monitoring as described in the O&M plan. In all cases where waste or contamination is left in place as part of the RA, the O&M phase is expected to be a long-term activity. Where waste or contamination is left in place, the operable unit will be evaluated by the lead regulatory agency at least every 5 years during the O&M phase to determine whether continued O&M activity is indicated or further RA is required. The lead regulatory agency may conduct more frequent evaluations should data indicate this is necessary to ensure effective implementation of the RA. All O&M data and records obtained to that date, along with any additional information provided by the DOE, will be used in that evaluation.

In cases where all waste or contamination is removed or destroyed, a short period for the O&M phase for specific units within an operable unit may be specified by the lead regulatory agency. The lead regulatory agency may, where appropriate, allow for the O&M phase to be terminated for certain units within an operable unit while requiring O&M to be continued at other units. In these cases, certain units may be considered for delisting in accordance with the NCP, after the O&M phase has been completed.

x The O&M plan is a primary document as described in Section 9.0. The schedule for conducting significant steps described in the O&M plan are specified for each operable unit in the work schedule (Appendix D).

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**7.4 RESOURCE CONSERVATION AND RECOVERY ACT
PAST-PRACTICE UNIT PROCESS**

The RPP processes are the subject of this Section and are governed by the authorized state corrective action program.

**7.4.1 Resource Conservation and Recovery Act
Facility Assessment**

For those units that are defined as RPP units, (see definition in Section 7.1), the lead regulatory agency for an operable unit may require the DOE to conduct a RCRA facility assessment (RFA) of all or some of the RPP units within that operable unit. The need for an RFA is based on whether sufficient knowledge exists to determine if an RFI is required. Based on the results of the RFA, the lead regulatory agency may require additional information from the DOE, or it may determine that no further investigation or corrective action is required for any of the RPP units within the operable unit. The project manager for the lead regulatory agency for that operable unit may direct the DOE to conduct a RFI based on results of the RFA.

The RFA will be developed in accordance with current applicable regulations, guidance documents, and written policy available at the time the RFA is begun. An RFA report will be prepared documenting the results of the RFA. The RFA report is a primary document as described in Section 9.0. If the lead regulatory agency determines that further investigation is necessary, the project manager for the lead regulatory agency will direct the DOE to prepare an RFI report, as described below.

In some cases, sufficient information may already exist that indicates that further investigation will be required. In these cases the RFA process will be bypassed and effort will be focused on the RFI/CMS. Figure 7-5 shows the normal sequence of events that occur during the RFI/CMS process.

**7.4.2 Resource Conservation and Recovery Act
Facility Investigation**

Each RCRA Facility Investigation (RFI) will address all units within a specific operable unit, as identified in the RFI/CMS work plan. Certain operable units also contain TSD units, primarily land disposal units, that are to be investigated and managed in conjunction with past-practice units. The information necessary for performing RCRA closures within an operable unit will be provided in coordination with various RFI/CMS documents as discussed in Section 5.5. The RFI/CMS work plan will be functionally equivalent to an RI/FS work plan (see Section 7.3.2). Timing for submittal of the work plan will be in accordance with the work schedule (Appendix D).

X

An RFI report will be prepared by the DOE, and it will document the results of the RFI. The RFI report is a primary document as described in Section 9.0. The schedule for conducting the RFI will be specified for each operable unit in the work schedule (Appendix D) and integrate any planned facility dispositioning per paragraph 8.3. The parties agree that the information obtained through the RFI must be functionally equivalent to information gathered in the CERCLA process through the RI Phases I and II, as described in Sections 7.3.3 and 7.3.6.

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Based on the results of the RFI, the lead regulatory agency may determine that no further investigation or corrective action is required for each RPP unit in an operable unit. The project manager from the lead regulatory agency for that operable unit may direct the DOE to conduct a CMS based on results of the RFI.

7.4.3 Corrective Measures Study

A Corrective Measures Study (CMS) shall be prepared by the DOE and will include an identification and development of the corrective measure alternative(s), an evaluation of these alternatives, and a justification for the recommended alternative. The CMS will include development of a cost estimate for each alternative considered.

X A CMS report documenting the results of the study will be prepared by the DOE. The CMS report is a primary document as described in Section 9.0. The schedule for conducting the CMS will be specified for each operable unit in the work schedule (Appendix D). The CMS report will become the basis for revision of the RCRA permit through the modification or revocation and reissuance processes described in Section 6.2. The parties agree that the information obtained through the CMS must be functionally equivalent to information gathered in the CERCLA process through the FS Phases I, II, and III as described in Sections 7.3.4, 7.3.5, and 7.3.7.

The lead regulatory agency for the operable unit shall continue its oversight role through the corrective measures implementation (CMI) phase and through any long-term monitoring or maintenance phase that is specified in the CMI work plan.

7.4.4 Corrective Measures Implementation

The DOE will initiate, maintain progress toward completion of, and complete any necessary corrective action for all RPP units within each operable unit in accordance with the CMI work plan. This will be done in accordance with current applicable regulations, guidance documents, and written policy available at any time during the corrective action process. It is agreed by the parties that the content of the CMI work plan will be considered to be functionally equivalent to that of the RA work plan described in Section 7.3.10.

X The CMI work plan and the corrective measures design (CMD) report, which are produced as part of the CMI phase, are primary documents as described in Section 9.0. The schedule for developing the CMI work plan and conducting the CMI will be specified for each operable unit in the work schedule (Appendix D). The CMI phase will be conducted in accordance with the schedule of X compliance specified in the RCRA permit and the work schedule (Appendix D).

Upon satisfactory completion of the CMI phase as described in the CMI work plan for a given operable unit, the lead regulatory agency shall issue a certificate of completion to the DOE for that operable unit. At the discretion of the lead regulatory agency, a certificate of completion may be issued for completion of a portion of the CMI phase for an operable unit.

7.4.5 Offsite Releases and Corrective Action

In the event that hazardous constituents or contamination from a landfill unit, surface impoundment, or waste pile is found to have migrated beyond the boundaries of the Hanford Site, the lead regulatory agency may require that corrective action for such contamination be conducted. Corrective action authority will be implemented through a schedule of compliance. The DOE shall make every reasonable effort to gain access to investigate and remediate offsite contamination. The DOE will document attempts to attain offsite access for investigative work and corrective action in such cases, in accordance with the access provisions as specified in Article XXXVII of the Agreement. Where necessary to accomplish offsite RA, such releases may be addressed by the lead regulatory agency under CERCLA authority.

X The DOE will initiate, maintain progress toward completion of, and complete any offsite corrective action required by the lead regulatory agency, in accordance with the time frames specified in the work schedule (Appendix D) and in accordance with current applicable regulations, guidance documents, and written policy available at any time during the corrective action process.

7.5 CLEANUP REQUIREMENTS

In accordance with Section 121(d) of CERCLA, the DOE will comply with all ARARs when hazardous substances, pollutants, or contaminants are to remain onsite as part of RAs. These requirements include cleanup standards, standards of control, and other substantive environmental protection requirements and criteria for hazardous substances as specified under Federal or State laws and regulations. The parties intend that ARARs, as appropriate, will apply at units being managed under the RPP program at the Hanford Site to ensure continuity between the RCRA and CERCLA authorities.

"Applicable requirements" are those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under Federal or State law. These requirements specifically address a hazardous substance, pollutant, contaminant, hazardous waste, hazardous constituent, RA, location, or other circumstance at the Hanford Site.

"Relevant and appropriate requirements" are those which do not meet the definition of applicable requirements, yet pertain to problems or situations similar to those encountered in the cleanup effort at the Hanford Site. Such requirements must be suited to the unit under consideration and must be both relevant and appropriate to the situation.

The ARARs are classified into three general categories as follows:

- Ambient or chemical-specific requirements. These are established numeric criteria for various constituents. These criteria are usually set from risk-based or health-based values or methodologies
- Performance, design, or other action-specific requirements. These are usually technology or activity-based requirements or limitations on actions taken with respect to a given hazardous substance or hazardous constituent

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11.0 WORK SCHEDULE AND OTHER WORK PLANS

11.1 INTRODUCTION

X This section describes the format and content of the work schedule, and the process for annual updates and other revisions. In addition, this section identifies those primary documents that contain other schedules that directly support the work schedule.

X The work schedule is contained in Appendix D. It includes the major and interim milestones and additional target dates that support the accomplishment of the major milestones described in Section 2.0. Both major and interim milestones are considered enforceable under the Agreement. Dates specified as target dates are incorporated in the work schedule for the purpose of tracking progress toward meeting milestones, and are not enforceable. Work plans and reports will specify additional target dates and milestones. Milestones and target dates will be incorporated into the Agreement via the change process defined in Section 12.0 upon issuance of the approved work plan or report, and incorporated into the work schedule as part of the revision process. The work schedule will indicate actions required at each operable unit identified in Appendix C or TSD group identified in Appendix B. Such actions include, but are not limited to, the following:

- Permitting activities
- Closures
- Groundwater monitoring
- Achieving interim status requirements
- Ceasing disposal of contaminated liquids to the soil column
- Investigations and characterization
- Remedial and corrective actions
- Technology improvements
- New facilities to enhance operations and eliminate long-term storage
- Land disposal restriction requirements

X 11.2 WORK SCHEDULE FORMAT AND PREPARATION

X The work schedule is depicted on a time-scale format, and is seven years in length. The current calendar year is shown on a monthly time scale in sufficient detail to identify all target dates and milestones. The second year is shown on a quarterly scale, with the remaining five years on an annual scale. A listing of the interim milestones and target dates (grouped by major milestone) is provided in Appendix D.

X 11.3 WORK SCHEDULE UPDATES

X The work schedule will be updated periodically to expand the level of detail per Section 11.2. In addition, any approved schedule changes (see Section 12.0 for formal Change Control System) will be incorporated at this time if not previously incorporated. Each update will be performed as agreed by the three parties.

X The work schedule may also be updated for clarity to incorporate previously approved changes made in accordance with Section 12.2. Such updates do not require approval signatures and are not subject to the public comment process.

11.4 WORK PLANS AND SUPPORTING SCHEDULES

Unless otherwise specified, workplans, including those workplans prepared under the Hanford Past Practice Investigation Strategy, shall be prepared, reviewed and approved as primary documents. At the time work plans are submitted for approval they shall describe in detail the work to be done and include the performance standards to be met. They shall also include an implementation schedule with start and completion dates. The work plan schedule shall identify completion dates for major tasks and deliverables as interim milestones. Milestones shall be set in a manner which fits the requirements of the work to be accomplished, with at least one milestone every twelve months, unless otherwise agreed to by the project managers. A change package shall be submitted with the workplan which identifies the interim milestones.

Schedules may be constructed in a manner that allows tasks or deliverables which require or follow regulatory agency review and approval to be due a fixed number of days after approval, rather than on a fixed date. The project managers will rely primarily on the supporting schedules for tracking progress.

Required workplans include:

- RI/FS work plan
- Remedial action work plan
- Closure plan
- RFI/CMS work plan
- CMI plan
- LFI work plan
- ERA work plans/EECA's.

These ERA work plans/EECA's are not to be prepared, reviewed and approved as primary documents, but are subject to approval in accordance with Section 7.2.4 of the Action Plan. Additional detailed schedules, beyond those contained in the above plans, may be needed as agreed to by the assigned project managers to provide more definitive schedules to track progress. These may be part of other plans or may be stand-alone schedules.

11.5 OTHER WORK PLANS

In addition to the work plans previously described, other work plans may be developed for special situations at the request of the lead regulatory agency. These work plans will be considered primary documents as discussed in Section 9.1, and are subject to all work plan requirements, including those identified above in Section 11.4.

11.6 SUPPORTING TECHNICAL PLANS AND PROCEDURES

In addition to the requirements as specified in this Agreement, supporting technical plans and procedures may be developed by DOE. They will be reviewed for approval by EPA and Ecology as primary documents or reviewed as secondary documents as determined by EPA and Ecology. In the event that such supporting technical plans and procedures apply only to a specific operable unit, TSD group/unit or milestone the lead regulatory agency will provide the necessary review and approval. The DOE may submit such plans or procedures at any time, without request of the regulatory agencies. The EPA or Ecology may also request that specific plans or procedures be developed or modified by DOE, consistent with Article XXX of the Agreement. These technical plans and procedures shall pertain to specific compliance and cleanup activities conducted pursuant to this Agreement and shall provide a detailed description of how certain requirements will be implemented at the Hanford Site. DOE shall comply with the most recent approved versions of these technical plans and procedures and those secondary documents which are in effect.

X Appendix F contains a listing of current supporting technical plans and procedures and their respective status. Changes to Appendix F will be accomplished in accordance with Section 12.0. Appendix F will be updated annually in conjunction with the annual update to the Work Schedule.

11.7 TANK WASTE REMEDIATION SYSTEM CRITICAL PATH PROCESS

Tank waste remediation milestones will be established using a critical path process as described in this section. The tank waste remediation program will be established and managed as an integrated system and shall include all activities associated with waste characterization, retrieval/closure, tank stabilization, pretreatment, treatment of high-level and low-level tank waste, acquisition of new tanks, and the multi-purpose storage complex. The parties will develop detailed operating procedures and implement the critical path milestone system on a trial basis, in April 1994, with full implementation by September 30, 1994.

- A. For the purposes of critical path analysis, negotiated dates for completion of single-shell tank waste retrieval, the final closure of single-shell tank farms, and completion of all high-level and low-level tank waste treatment shall be designated as program endpoints and shall be major milestones.
- B. Activities and associated schedules for this program shall be included in the Site Management System (SMS). All activities, milestones, and target dates necessary for tracking the program will be negotiated for inclusion in this Agreement. Activity definition will be based generally on SMS Level 0 schedules, but may in some

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12.0 CHANGES TO THE AGREEMENT

12.1 INTRODUCTION

This section provides the process for changing elements of the Agreement, the Action Plan and its Appendices. All changes processed using this section shall be subject to the applicable requirements of Section 10.0 Community Relations/Public Involvement.

12.2 AUTHORITY TO APPROVE CHANGES

The appropriate authority level for approval of a change is based on the content of the change as follows.

- Class I Change--A Class I change is a change to parts one through five of this agreement or a major milestone as defined in Section 2.0. A Class I change requires the approval of the signatories or their successors as shown in Section 14.0.
- Class II Change--A Class II change is any change to the Action Plan or its appendices except as specified for Class I or Class III changes. A Class II change requires the approval of the DOE and affected lead regulatory agency executive managers. Changes made to lead regulatory agency lead designations only may be approved by the EPA and Ecology executive managers.
- Class III Change--A Class III change is a change to a target date in the work schedule (Appendix D) or a supporting schedule that does not impact an interim milestone. A Class III change requires the approval of the DOE and lead regulatory agency project managers. It is not the intent of the parties to revise target dates because work is slightly behind or ahead of schedule. Such schedule deviations will be reflected through the reporting of work schedule status. The use of the change process for revising target dates is for use by the parties to delete, add, or accelerate or defer a target date (by more than 60 days).

X

X

12.3 FORMAL CHANGE CONTROL PROCESS

12.3.1 Change Control Form

All changes shall be processed using the change control form included as Figure 12-1. The following describes the process in accordance with the circled numbers shown in Figure 12-1.

- 1 Obtain and enter a "change number." The DOE shall maintain a log of all changes by number and title, along with a file copy of the change. An individual will be assigned responsibility for maintaining the change file and will be responsible for assigning change numbers. The change number can be obtained any time during the change process, even after the change is approved.

- 2 Enter the name of the originator or the requestor.
- 3 Enter the date the change was initiated.
- 4 Place an "x" in the box for the appropriate class of change per the criteria identified under Section 12.2.
- 5 Enter a short title for the change, which will be used primarily as a cross-reference on the change log.
- 6 Provide a description of the change, along with justification as to why the change should be made. Use an attached sheet of paper if additional space is required.
- 7 Explain what is impacted by this change.
- 8 List all documents that will have to be revised because of the change.
- 9 Obtain approval signatures based on the class of change assigned. Approval via telephone is acceptable, but must be followed up with a signature as soon as possible thereafter.
- 10 This space is available for special notes, comments, or other signatures as required.

X Backup information should be attached as necessary to support the change. Once approved, the change is considered implemented. Affected documents (e.g., work schedule) need not be updated until their next scheduled update.

12.3.2 Request for Extension

Any DOE request for extension shall be submitted in writing and shall specify:

- A. The timetable and deadline or schedule for which the extension is sought;
- B. The length of the extension sought;
- C. The good cause for the extension; and
- D. Any related timetable and deadline or schedule that would be affected if the extension were granted.

12.3.3 Response to Requests for modifications

Within 14 days of receipt of a signed change control form requesting modification of a milestone time table and deadline or other enforceable requirement, each affected Party shall respond by either approving or disapproving the request in writing. If any affected party fails to respond within the 14 day period for review, it shall be deemed to constitute disapproval of the request. If a Party disapproves a requested modification, it shall explain the basis for the disapproval in writing.

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12.3.4 Transmittal and Responses to Requests for modification

A signed Class I change control form and/or response may be transmitted by mail or overnight express delivery to any Party's normal business location addressed to the responsible signatory with copy to the responsible project manager, return receipt requested, or by hand delivery to the responsible signatory.

A signed Class II change control form and/or response may be transmitted by mail or overnight express delivery to any Party's normal business location addressed to the responsible Executive Manager with copy to the responsible project manager, return receipt requested, or by hand delivery to the responsible executive manager.

A signed Class III change control form and/or response may be transmitted by mail or overnight express delivery to any Party's normal business location addressed to the responsible project manager, return receipt requested, or by hand delivery to the responsible project manager.

Transmittal of signed change control forms and/or responses may also be made by electronic facsimile, but only if on the day of transmittal the transmitting Party notifies the intended recipient(s) by telephone of such transmittal. The recipient's agency must acknowledge receipt by return facsimile. Documents transmitted by electronic facsimile that are illegible, or that are not received in their entirety, shall not be deemed received.

12.4 MINOR FIELD CHANGES

To ensure efficient and timely completion of tasks, minor field changes can be made by the person in charge of the particular activity in the field. Minor field changes are those that have no adverse effect on the technical adequacy of the job or the work schedule. Such changes will be documented in the daily log books that are maintained in the field.

X

tribunal and to raise any objection whatsoever to such permits except that DOE will not challenge Ecology's authority to administer the WAC Chapter 173-216 permit program at the Hanford Site.

13.1.3 Liquid Effluent Discharge Milestones and Negotiations

X The Parties will also negotiate additional interim and final milestones to be included in this Agreement addressing, without limitation, waste reduction, interim and final treatment, and/or termination of the 33 Phase I and Phase II streams. These negotiations will be completed by September 1991. Negotiated milestones will be included in the 1992 Annual Update to the Work Schedule (Appendix D).

The Parties are agreeing now to the addition of certain interim milestones (M-17-11, M-17-12, and M-17-13) in Milestone M-17-00. These milestone requirements relate to interim or final remedial actions which will be taken at Operable Units affected by those discharges. The specific descriptions of these milestone requirements are set forth in Appendix D of this Agreement, Tables D-4 and D-5.

13.1.4 Sampling and Analysis Plans

DOE will develop a stream specific sampling and analysis plan (SAP) for the Phase I and Phase II streams which continue to discharge to the soil column as specified in Appendix D, Table D-4. These SAPs shall be subject to approval of EPA and Ecology and will include an implementation schedule. The SAPs must provide for representative sampling of wastes discharged to the soil column, accounting for significant variations in volumes and contaminant concentrations due to operational practices. The frequency of sampling will vary, depending on the consistency or trends established for each stream over time. The SAPs will consider all of the parameters known or suspected to be associated with each liquid effluent stream with consideration given to the influence of operational practice, raw water characteristics, and process knowledge in developing contaminant analysis requirements. DOE will sample and analyze each stream in accordance with the approved sampling and analysis plan. The timing for development of each SAP will be specified on the appropriate M-17-00 milestone as set forth in Appendix D, Table D-4.

13.1.5 Assessment of Environmental Impact of Continuing Liquid Discharges

DOE will develop a methodology for assessing the impact of all discharges (including both active and proposed) on groundwater at the disposal sites. This methodology will rely on available data, additional liquid effluent sampling, analytical results supplied under Section 13.1.4, and optimal management practices. DOE shall submit this methodology to EPA and Ecology for approval. Within 30 calendar days after notification of approval of the methodology, DOE shall submit a schedule for the completion of the assessments for each of the 33 Phase I and Phase II effluent streams which will continue beyond June 1992.

Major Milestones

The master plan and schedules for Action Plan work are found in Section 2.0, Milestones. These major milestones contain enforceable commitments for the most significant actions in the Action Plan, including:

- Closure of the Hanford single-shell tanks and final disposal of all tank wastes;
- Investigation and cleanup of all contamination at operable units;
- Permitting and closure of treatment, storage, and disposal units;
- Ceasing disposal of all contaminated liquids to soils; and
- Operation of the High-Level Waste Vitrification Plant.

Unit Identification, Categorization, and Prioritization

x The approximately 55 TSD groups on the Hanford Site are identified in Appendix B as those which will continue to operate, and those which are to be closed. Actions associated with these TSD groups have been prioritized on the work schedules based on (1) the risk to public health and environment, (2) benefits received in minimizing wastes in terms of volume and toxicity, and (3) operational considerations.

Approximately 1000 past-practice units are identified in Appendix C. They have been grouped into approximately 74 operable units for the purposes of investigation and cleanup. An operable unit is a grouping of individual waste units based primarily on geographic area and common waste sources. The operable units are prioritized for investigation based on an initial assessment of environmental risk potential. The assessment considers waste volume, hazardous substances and their toxicity or health effects, and the potential for migration of these substances.

Project Managers

EPA, DOE, and Ecology have designated individuals who will serve as Project Manager who will have the primary responsibility for all activities to be carried out in regard to their assigned operable unit, TSD group/unit or milestone under the Action Plan.

Project managers will conduct monthly meetings concerning their respective areas of responsibility. These meetings will address status and problem areas. The goal is to maximize communication among the three parties.

Integration of RCRA and CERCLA

RCRA and CERCLA overlap in many areas. RCRA and CERCLA both require corrective action for releases regardless of time of release. RCRA regulated wastes are also regulated under CERCLA. Many of the RCRA disposal units on the Hanford Site which are scheduled for closure are located in close proximity to past-practice units. These TSD units have been incorporated into the appropriate operable unit with the past-practice units so that integrated investigation and cleanup actions result. These TSD units will be closed

RCRA	CERCLA	GOAL
RCRA Facility Assessment (RFA)	Preliminary Assessment/ Site Investigation (PA/SI)	Identify Releases Needing Further Investigation
RCRA Facility Investigation (RFI)	Remedial Investigation (RI)	Characterize Nature, Extent, and Rate of Release
Corrective Measures Study (CMS)	Feasibility Study (FS)	Evaluate Alternatives and Identify Preferred Remedy
Draft Permit Modification	Proposed Plan	Propose Selected Remedy
Public Comment	Public Comment	Public Participation
RCRA Permit	Record of Decision	Authorize Selected Remedy
Corrective Measures Implementation (CMI)	Remedial Design/ Remedial Action (RD/RA)	Design and Implement Chosen Remedy

A work plan will be developed for each operable unit that will address all activities from the start of field investigation through the proposed selection of a remedy for cleanup. Both the work plan and the documentation of the selected remedy will be made available for public comment.

X Appendix D provides the definitive work schedule which reflects specific dates for activities in support of the major milestones.

Documentation and Administrative Record

All documents will be categorized as either primary or secondary documents. Primary documents represent the interpretation of key data and reflect decisions on how to proceed. Secondary documents represent an

interim step in a decision making process, or are issued for information only and do not reflect key interpretations. Only primary documents are approved by the regulatory agencies and can be subjected to the dispute resolution process detailed in the Agreement. All documents (including secondary documents) will be reviewed by the regulatory agencies. The specific processes for document review, comment, and revision are contained in the Action Plan.

An Administrative Record will be established for each operable unit and TSD group, and will contain all of the documentation considered in arriving at CERCLA decision or RCRA permit. The Administrative Record file, including an index, will be available to the public for review in Richland, Seattle, and Lacey, Washington.

Action Plan Publication

X An updated version of the Action Plan will be published periodically as agreed upon by the three parties. The work schedule (contained in Appendix D) covers seven years, with the near-term shown in detail.

COMMUNITY RELATIONS

Section 10.0 of this Action Plan summarizes the community relations activities in support of the Agreement. A separate Community Relations Plan has been developed that meets the requirements for having such a plan at NPL sites, and also covers all the community relations needs of the Agreement, including RCRA public involvement requirements. The following summarizes the key elements of the Community Relations Plan:

- Public information repositories will be maintained in Seattle, Richland, and Spokane, Washington, as well as Portland, Oregon. Key documents and other information will be kept in these repositories for ready access by the public.
- Quarterly public information meetings will be held. Two meetings will be held each quarter; one in Richland, and the other rotated between other locations.
- Key decision documents will be made available for public comment prior to being finalized. Public meetings concerning these documents will be held as appropriate. Public hearings will be held upon request for draft permits or permit modifications.
- X • Changes to the Agreement, Action Plan, work schedule and other appendices will be subject to public comment based upon the significance of the pending change, as defined in the Community Relations Plan.
- An active system of keeping the public informed will be implemented. A mailing list will be maintained for distribution of fact sheets and newsletters.
- A federal technical assistance grant program will be administered by EPA and a public participation grant program will be administered by Ecology.

<p>Change Number E-96-01</p>	<p>Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small></p>	<p>Date February 20, 1996</p>																								
<p>Originator R. D. Morrison</p>		<p>Phone (509) 376-6574</p>																								
<p>Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager</p>																										
<p>Change Title Update Appendix E for 1996 printing of the Hanford Federal Facility Agreement and Consent Order.</p>																										
<p>Description/Justification of Change Replace the current Appendix E "Key Individuals" of the Hanford Federal Facility Agreement and Consent Order (Agreement) with the attached updated version of Appendix E. Upon the final approval of the Sixth Amendment to the Agreement the entire Agreement will be reprinted incorporating all approved changes to date. Therefore, Appendix E must be updated to reflect current Key Individuals. To reflect the changes in the management structure of the Agreement established by Amendment Six the new Appendix E contains the names, addresses and phone numbers of the newly established Executive Managers (which also comprise the members of the Inter Agency Management and Integration Team [IAMIT]).</p>																										
<p>Impact of Change No impact is involved in this change since the individuals and the toll free information phone service are already performing in these assigned roles.</p>																										
<p>Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix E.</p>																										
<p>Approvals</p> <table border="0"> <tr> <td data-bbox="170 1575 625 1627">_____</td> <td data-bbox="625 1575 795 1627">Date _____</td> <td data-bbox="844 1575 990 1606">___ Approved</td> <td data-bbox="1006 1575 1193 1606">___ Disapproved</td> </tr> <tr> <td data-bbox="170 1648 625 1701">DOE</td> <td></td> <td></td> <td></td> </tr> <tr> <td data-bbox="170 1711 625 1764">_____</td> <td data-bbox="625 1711 795 1764">Date _____</td> <td data-bbox="844 1711 990 1743">___ Approved</td> <td data-bbox="1006 1711 1193 1743">___ Disapproved</td> </tr> <tr> <td data-bbox="170 1774 625 1827">EPA</td> <td></td> <td></td> <td></td> </tr> <tr> <td data-bbox="170 1837 625 1890">_____</td> <td data-bbox="625 1837 795 1890">Date _____</td> <td data-bbox="844 1837 990 1869">___ Approved</td> <td data-bbox="1006 1837 1193 1869">___ Disapproved</td> </tr> <tr> <td data-bbox="170 1900 625 1953">Ecology</td> <td></td> <td></td> <td></td> </tr> </table>			_____	Date _____	___ Approved	___ Disapproved	DOE				_____	Date _____	___ Approved	___ Disapproved	EPA				_____	Date _____	___ Approved	___ Disapproved	Ecology			
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_____	Date _____	___ Approved	___ Disapproved																							
Ecology																										

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APPENDIX E
KEY INDIVIDUALS

Executive Managers	U.S. Environmental Protection Agency Region 10	Washington State Department of Ecology	U.S. Department of Energy, Richland Operations
	Doug Sherwood (509) 376-9529	Mike Wilson (360) 407-7150	Charles Hansen(509) 376-7434 Jackson Kinzer (509) 376-7591 Linda McClain (509) 376-6628 Lloyd Piper (509) 376-7435 Robert Rosselli (509) 372-4005
Community Relations Contacts	Environmental Protection Agency Region 10 712 Swift Blvd., Suite 5 Richland, WA 99352	Washington Department of Ecology Nuclear Waste Program P.O. Box 47600 Olympia, WA 98504-7600	U.S. Department of Energy Field Office Richland P.O. Box 550 Richland, WA 99352
	Dennis Faulk (509) 376-8631	Laurie Davies (360) 407-7113	Jon Yerxa (509) 376-9628

Additionally for the latest information concerning the Hanford cleanup you can call toll free:

1 - 800 - 321 - 2008

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