

START

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Change Number M-23-90-4	FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM <small>Do not use blue ink. Type, or print using black ink.</small>	Date 06/18/90
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Originator R. D. Pierce	Phone 373-4846
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Class of Change	<input type="checkbox"/> I - Signatories (Section 13.0)	<input checked="" type="checkbox"/> II - Project Manager	<input type="checkbox"/> III - Unit Manager
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Change Title T-Plant "TBG" submission date change

Description/Justification of Change

Hanford Federal Facility Agreement and Consent Order Interim Milestone M-23-01 requires that T Plant, 204-AR Waste Unloading Station, 222-S Laboratory, and PUREX resubmit treatment-by-generator (TBG) requests by June 30, 1990. The T Plant TBG request, to be resubmitted in accordance with Interim Milestone M-23-01, includes additional waste designation based on process knowledge; however, due to the variety of potential contaminants from past and present operations, it is felt that analytical data is needed to verify the process knowledge designation presented. Because analysis results are not expected in time to be incorporated into the T Plant TBG request supporting Interim Milestone M-23-01, an extension of the interim milestone for T Plant is established to require resubmittal of the T Plant TBG request containing a detailed waste stream designation based on analytical data.

Analytical data was planned to support T Plant's June 30th TBG submittal; however, it is not possible due to unforeseen difficulties. Sampling was to begin in mid April but was delayed due to failure of an independent canyon crane inspection. (See page 2.)

Impact of Change
None; facility is being managed in accordance with state dangerous waste requirements.

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6
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2
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6
9
2
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2



Affected Documents
Hanford Federal Facility Agreement and Consent Order, Calendar Year 1990 Annual Update, Volume 2, Table D-3 and Figure D-1.

Approvals	___ Approved	___ Disapproved
DCE	_____	Date _____
EPA	_____	Date _____
Ecology	_____	Date _____

Change Number: M-23-90-4

Description/Justification of Change (Continued)

DESCRIPTION:

The crane, which is required for waste sampling, was repaired in mid May. At the same time, a temporary restriction was placed on the use of Richland's U.S. Testing Laboratory for alleged contract violations. U.S. Testing was to provide analytical support for the T Plant waste designation. Following a practice run and a lift on the temporary ban of U.S. Testing, sampling was initiated during the last week of May. The same day sampling began, the U.S. Testing contract to provide analytical support was formally cancelled.

Although alternate laboratories (325 and 222-S Laboratories) have been identified to perform the needed analyses, results will not be received in time to support the June 30th submittal. In addition, the laboratories do not have the capabilities to perform all of the analyses in accordance with EPA protocol. Alternate methods to complete the needed analyses will follow EPA protocol as closely as possible.

This change will require submittal of a TBG request for T Plant incorporating analytical data by September 30, 1990. This change extends those requirements of interim milestone M-23-01 which pertain to T-Plant only; all other facility requirements under M-23-01 remain unchanged.

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