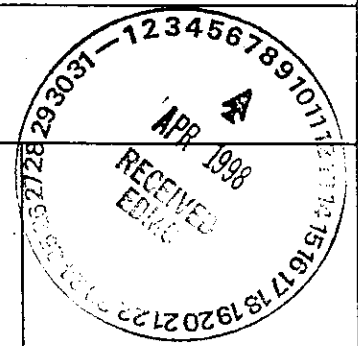


Change Number <p style="text-align: center;">M-20-97-01</p>	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date <p style="text-align: center;">10/7/97</p>
Originator Linda Bauer		Phone 376-6628
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Agreement Milestone series M-20 Revisions to Support 200 Area Soil Remediation Strategy		
Description/Justification of Change <p>M-20-00 contains schedules for the submittal of closure plans for the cleanup of treatment, storage, and disposal (TSD) sites under the <i>Resource Conservation and Recovery Act</i> (RCRA). The three parties jointly developed an improved approach to investigation and subsequent remediation of RCRA TSD waste sites closely associated with past-practice units within the Environmental Restoration (ER) Program (EM-40), based on lessons learned from Hanford's 100 and 300 Areas. The coordination of the TSD units closure with the past-practice investigation and remediation activity is necessary to prevent overlap and duplication of work, thereby economically and efficiently addressing the contamination. These TSD groups/units assigned to an operable unit are prioritized in conjunction with past-practice priorities for purposes of investigations and are to be investigated and managed in conjunction with past-practice units. Remedial investigations will now focus on representative sites from groups with similar history and waste site types (ponds, ditches, cribs, etc.), and the results will be generally applied to the entire waste site group.</p> <p style="text-align: right;">[Description/Justification of Change is continued]</p>		
Impact of Change <p>Modifications to implement this strategy are:</p> <ul style="list-style-type: none"> • M-20-00 major milestone has been changed to February 28, 2004 and reference to EPA is to be deleted. • M-20-33 interim milestone has been changed to delete reference to EPA and to be in coordination with the Uranium Rich Process Waste Group with the corresponding Due Date changed to 10/31/2003. • M-20-39 interim milestone has been changed to delete reference to EPA and to be in coordination with the Chemical Sewer Group with the corresponding Due Date changed to 2/28/2003. <p style="text-align: right;">[Impact of Change is continued]</p>		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan.		
Approvals		
 _____ DOE	3/5/98 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
 _____ EPA	3-20-98 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
 _____ Ecology	3-16-98 _____ Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved



Description/Justification of Change (continued):

These investigations will be sufficiently comprehensive to satisfy the technical requirements of both RCRA and *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA). Technical requirements of both RCRA and CERCLA are not all inclusive, but are focused on the initial stages of cleanup/closure where representative data is generally adequate for remedy selection purposes. However, it is recognized that waste site specific data is required to satisfy RCRA Closure/Postclosure requirements. The information necessary for performing RCRA closures/postclosures will be provided in coordination with past-practice sites investigations and various RFI/CMS documents. The 200 Area RI/RS (RFI/CMS) Implementation Plan (which will be a primary document per Section 9 of the TPA and will establish the common requirements for future characterizations in the 200 Areas) will provide up front approval of all cross-cutting aspects of the characterizations and individual Work Plans for the 23 waste site groups (previously 32 work plans were required) will be prepared. These plans will incorporate both RCRA requirements as well as CERCLA requirements (see associated Agreement Change Control Form for M-13-97-01 for additional detail). These documents in combination will meet all substantive requirements of CERCLA RI/FS and RCRA RFI/CMS Work Plans. The existing M-13 and M-20 milestones are not aligned to complement integration and the adjustment of the M-20-00 milestone to 2/28/2004 allows for a coordinated alignment of these two milestones. Interim milestones M-20-33 through M-20-54 have been modified both in text and submittal dates to reflect this approach. Changes to Appendix B of the Action Plan will be required to reflect these new operable unit designations and will be performed upon approval of this change control form. Please refer to associated Agreement Change Control Form M-13-97-01 for additional changes to M-13 milestones.

Impact of Change (continued):

- M-20-52 interim milestone has been changed to delete reference to EPA and to be in coordination with the General Process Waste Group with the corresponding Due Date changed to 12/31/2003.
- M-20-53 interim milestone has been changed to delete reference to EPA and to be in coordination with the General Process Waste Group with the corresponding Due Date changed to 12/31/2003.
- M-20-54 interim milestone has been changed to delete reference to EPA and to be in coordination with the Infrastructure Waste Group with the corresponding Due Date changed to 2/28/2004.

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-20-00	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS. LEAD AGENCY: PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS ECOLOGY WILL BE SUBMITTED TO ECOLOGY FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D. PRECLOSURE WORK PLANS WILL BE PREPARED AND SUBMITTED FOR APPROVAL FOR TSD UNITS WHICH WILL ACHIEVE CLOSURE IN CONJUNCTION WITH THE DISPOSITION OF THE FACILITY IN WHICH THEY ARE CONTAINED.	2/28/2004
M-20-33	SUBMIT 216-A-10 CRIB AND 216-A-36B CRIB CLOSURE/POSTCLOSURE PLANS TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE URANIUM RICH PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-23).	10/31/2003
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE/POSTCLOSURE PLANS TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE CHEMICAL SEWER GROUP (TO BE COORDINATED WITH M-13-21).	2/28/2003
M-20-52	SUBMIT 216-A-37-1 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	12/31/2003
M-20-53	SUBMIT 207-A RETENTION BASIN CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	12/31/2003
M-20-54	SUBMIT 241-CX TANK SYSTEM CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE INFRASTRUCTURE WASTE GROUP (TO BE COORDINATED WITH M-13-00K).	2/28/2004

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-20-00	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS. LEAD AGENCY: PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS WILL BE SUBMITTED TO ECOLOGY AND/OR EPA FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D.	12/31/2003 2/28/2004
	PRECLOSURE WORK PLANS WILL BE PREPARED AND SUBMITTED FOR APPROVAL FOR TSD UNITS WHICH WILL ACHIEVE CLOSURE IN CONJUNCTION WITH THE DISPOSITION OF THE FACILITY IN WHICH THEY ARE CONTAINED.	
M-20-33	SUBMIT 216-A-10 CRIB AND 216-A-36B CRIB CLOSURE/POSTCLOSURE PLANS TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN FOR OPERABLE UNIT 200 PO 2 (TO BE SATISFIED BY M 13 11) FOR URANIUM RICH PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-23).	6/30/98 10/31/2003
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE/POSTCLOSURE PLANS TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN FOR OPERABLE UNIT 200 PO 1 TO BE SATISFIED BY M 13 15) THE CHEMICAL SEWER GROUP WORK PLAN (TO BE COORDINATED WITH M-13-21).	6/30/99 2/28/2003
M-20-52	SUBMIT 216-A-37-1 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN OF OPERABLE UNIT 200 PO 4 (TO BE SATISFIED BY M 13 12) FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	10/31/98 12/31/2003
M-20-53	SUBMIT 207-A RETENTION BASIN CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN OF OPERABLE UNIT 200 PO 5 (TO BE SATISFIED BY M 13 16) FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	10/31/99 12/31/2003
M-20-54	SUBMIT 241-CX TANK SYSTEM CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA IN COORDINATION WITH THE WORK PLAN OF OPERABLE UNIT 200 SO 1 (TO BE SATISFIED BY M 13 17) FOR THE INFRASTRUCTURE WASTE GROUP (TO BE COORDINATED WITH M-13-00K).	2/28/2000 2/28/2004