

<b>Change Number</b> M-83-00-01	<b>Federal Facility Agreement and Consent Order Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> 8/31/2000																																				
<b>Originator</b> Ecology		<b>Phone</b>																																				
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																																						
<b>Change Title</b> Establish two new PFP interim milestones for the disposition of Rocky Flats Ash (M-83-07 through -08)																																						
<b>Description/Justification of Change</b> This change request deals only with Rocky Flats (RF) Ash that is currently stored at the Plutonium Finishing Plant (PFP) and has been designated as a regulated mixed waste. Continued on page 2.																																						
<b>Impact of Change</b> Approval of this change request establishes new interim milestones governing the disposition of the Rocky Flats Ash mixed waste located at PFP, and beginning of PFP TPA Section 8 Transition phase negotiations. On approval, Hanford Site planning and budget development documents (e.g., Multi Year Work Plans, Site Wide Systems Engineering Control Documents and Project Management Plans) will be modified as required. Continued on page 2		<b>RECEIVED</b> OCT 19 2000  <b>EDMC</b>																																				
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended, DOE's Annual Land Disposal Restrictions Report, and Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Sitewide Systems Engineering Control Documents, Project Management Plans, and the Hanford site Intergrated Priority List).																																						
<b>Approvals</b> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 35%; border-bottom: 1px solid black; text-align: center;">W. Wade Ballard</td> <td style="width: 15%; border-bottom: 1px solid black; text-align: center;">8/31/00</td> <td style="width: 10%; text-align: center;">✓</td> <td style="width: 10%; text-align: center;">Approved</td> <td style="width: 10%; text-align: center;">_____</td> <td style="width: 10%; text-align: center;">Disapproved</td> </tr> <tr> <td style="font-size: small;">DOE</td> <td style="font-size: small;">Date</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black; text-align: center;">N/A</td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">_____</td> <td style="text-align: center;">Approved</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td style="font-size: small;">EPA</td> <td style="font-size: small;">Date</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black; text-align: center;">Michael C. L-L</td> <td style="border-bottom: 1px solid black; text-align: center;">9/18/00</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">Approved</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td style="font-size: small;">Ecology</td> <td style="font-size: small;">Date</td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			W. Wade Ballard	8/31/00	✓	Approved	_____	Disapproved	DOE	Date					N/A		_____	Approved	_____	Disapproved	EPA	Date					Michael C. L-L	9/18/00	✓	Approved	_____	Disapproved	Ecology	Date				
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### Description/Justification of Change (Continued)

On July 6, 2000, USDOE submitted to Ecology a Part A application for the PFP Treatment and Storage Unit, expanding the existing Part A for the PFP Treatment Unit to include storage.

On August 15, 2000, Ecology denied USDOE's Part A application. The proposed revision expanded the scope of the current Part A to include storage of mixed waste from the cementation process and other packaging activities. Ecology made the determination that this was not the proper path to regulatory compliance.<sup>1</sup> The USDOE does not agree with Ecology's determination and is preparing a response.

However, USDOE and Ecology do agree that the Change Package is an appropriate compliance tool to use to move the Rocky Flats Ash to compliant storage at the Central Waste Complex (CWC). Rocky Flats Ash mixed waste will be managed in accordance with WAC 173-303-400, unless otherwise noted in section 1.

### Impact of Change (Continued)

The parties agree to begin negotiations for the disposition of Hanford Ash mixed waste currently located at PFP by October 31, 2000. A change package for the disposition of that waste stream will be required by April 1, 2001. In addition, the parties will begin negotiations for the transition of the entire PFP facility beginning June 1, 2001.

### Description of Locations Covered by this Change Request.

#### 1. Scope

This Change Request covers all regulated dangerous waste activities required to repackage the Rocky Flats Ash mixed waste currently stored at PFP, and the subsequent storage and transfer of that ash to the Central Waste Complex (CWC). These activities will be conducted in PFP Bldg. 234-5Z. Repackaging and storage activities will be conducted in Rooms 170, and 192D. Glovebox HC-46F will be used for repackaging Rocky Flats Ash.

The management of Rocky Flats Ash mixed waste will be carried out in compliance with the applicable and substantive requirements of Washington Administrative Code (WAC) 173-303-400, except as noted below;

- Hazardous waste labeling as described in Section 5.

A compliant written operating record for the Rocky Flats Ash mixed waste will be maintained in accordance with WAC 173-303-380 during waste repackaging and storage activities at PFP and during waste transfer from PFP to CWC.

1. Ecology letter from Dr. Alex Stone to Mr. Steven H Wisness and Mr. Ronald D Hanson, RE "Hanford Dangerous Waste Part A Permit Application, Form 3, Revision 2, for the Plutonium Finishing Plant (PFP) Treatment and Storage Unit, dated July 6, 2000" dtd August 15, 2000.

## 2. Identification of Waste

The Rocky Flats Ash was produced at Rocky Flats, a product of incineration of combustible materials generated in the production and processing of plutonium. Rocky Flats Ash at Hanford was subsequently designated as mixed waste, to be disposed of in WIPP.

Rocky Flats Ash mixed waste is contained in 411 4 ¼ x 7 inch, standard industry 1.5 liter, double-sealed food-pack ("juice") cans currently being stored in the vaults at PFP. Rocky Flats Ash mixed waste comprises <.4 metric ton of the total Pu-bearing residues stored at PFP.

Ten of the Rocky Flats Ash mixed waste "juice" cans will be set aside in the PFP vaults to await verification sampling by a WIPP certified laboratory. The waste in the remaining 401 "juice" cans will be repackaged into approximately 280 pipe overpack containers (POC), beginning September 5, 2000, and transferred to CWC while awaiting transport to WIPP. (POC is a container engineered to provide appropriate spacing of and protection for transuranic wastes stored and transported to WIPP. The POCs are vented to allow escape of hydrogen gas and the lids are permanently closed at PFP to preclude intrusion).

## 3. Characterization and Sampling

Rocky Flats Ash mixed waste retained at the Rocky Flats Environmental Technology Site (RFETS) has been thoroughly characterized, and the characterization data has been provided to PFP. The characterization performed at RFETS included Resource Conservation and Recovery Act (RCRA) analyses to determine hazardous characteristics, metals, volatile and semi-volatile constituents. The Rocky Flats analytical data and process knowledge was used to designate the Rocky Flats Ash at PFP. Ecology has been provided a copy of the data package that supported designation of the Rocky Flats Ash. The Rocky Flats Ash at Hanford designates as a RCRA mixed waste and carries the waste codes D004-D011, F001, F002, and F005. Sampling and analysis will be performed to meet WIPP acceptance criteria.

## 4. Sample Selection

WIPP requires verification sampling from a WIPP-certified laboratory prior to accepting waste. The ten "juice" cans of Rocky Flats Ash mixed waste, identified through use of a random number generator have been set aside for WIPP verification sampling and analysis. A letter describing the requirement for selection of these cans, to be set aside for WIPP verification analyses, is in project files, and has been provided to Ecology.

## 5. Container Management

The Rocky Flats Ash mixed waste containers will be obtained from PFP vaults and moved to the HC-46F Glovebox in Room 170 of the 234-5Z Building. Each Rocky Flats Ash "juice" can will be put into HC-46F. In the HC-46F Glovebox each "juice" can will be opened, contents examined and blended with clean silica sand and graphite. The blended waste will be packaged into slip-lid (billet) cans. The blended Rocky Flats Ash mixed waste filled billet cans will be sealed out of the glovebox, safeguards labeled, and assayed via a Segmented Gamma Scanner. "Juice" can identification will be retained as the Rocky Flats Ash is being transported to the glovebox. The assayed billet cans will be placed into 55-gallon drums (POCS), which will be appropriately labeled to meet dangerous waste regulatory requirements. An operations log will track each step of the process. The plutonium content of the POCs will be limited to about 150 grams within the

packaged materials. Approximately 280 55-gallon drums are expected to be generated. When transportation from Hanford is scheduled, the Waste Receiving and Processing facility will package the POC drums in TRUPACT-II containers for final transport to WIPP.

#### 6. Disposition of Waste (Interim and Final Locations)

Drums containing the blended Rocky Flats Ash mixed waste will remain within 234-5Z, Room 170, until they are moved to Room 192D for storage while awaiting transfer to CWC. Ten drums may be stored in Room 170. One hundred drums may be stored in Room 192D. Waste transferred to CWC will meet CWC's acceptance criteria and comply with applicable dangerous waste management requirements while awaiting transfer to WIPP.

Prior to waste transfer to WIPP, container headspace sampling and analysis will be performed, per WIPP requirements.

#### 7. Schedule

The schedule and deliverables for performing this work are described in the M-83-07 and M-83-08 milestones below.

This change control form establishes the following two new interim milestones for the disposition of the Rocky Flats Ash mixed waste, and beginning of PFP TPA Section 8 Transition phase negotiations is hereby added to the TPA.

<u>Interim</u>	<u>Description</u>	<u>Due Date</u>
M-83-07	Complete repackaging and shipment of all Rocky Flats Ash mixed waste currently stored in PFP to the Central Waste Complex for storage. Repackaging and shipment of Rocky Flats Ash mixed waste does not include those items identified as NDA standards or set aside for WIPP verification sampling.	April 30, 2001
M-83-08	Complete all requirements necessary to ship all Rocky Flats Ash mixed waste covered by this change package to WIPP.	TBD This date will be determined during negotiations for the transition of the PFP facility to begin before June 1, 2001.