

Change Number M-37-19-01	Federal Facility Agreement and Consent Order Change Control Form		Date 7/01/2019
Originator Mostafa Kamal			Phone 509-376-0289
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Modification of M-037 Series Milestones in TPA Appendix D			
Description/Justification of Change <p>The U.S. Department of Energy, Richland Operations Office (DOE-RL) and the Washington State Department of Ecology (Ecology) began informally negotiating changes to the M-037 series milestones in June 2018 as part of the "Coordinated Closure" Initiative. The DOE-RL and Ecology agreed there was good cause to coordinate the development and implementation of closure plans for such Treatment, Storage and Disposal (TSD) units with the investigation and remediation of closely associated past-practice units.</p> <p>This change control form was coordinated with the following change control forms in the Coordinated Closure negotiations:</p> <ul style="list-style-type: none"> • P-03-19-01, Modify TPA, Action Plan, Section 3.3, Past-Practice Units, to Reflect RCRA Closures as Part of CERCLA Actions, • P-05-19-01, Modify Tri-Party Agreement (TPA), Action Plan, Section 5.5, Treatment, Storage, and Disposal Units and Past-Practice Units Interface, to Reflect RCRA Closures as Part of CERCLA Actions, • P-06-19-01, Modify TPA, Action Plan, Section 6.1, Treatment, Storage, and Disposal Unit Process, Introduction, and • P-07-19-01, Modify TPA, Action Plan, Section 7.4.2, Resource Conservation and Recovery Act Facility Investigation and Remedial Investigation. 			
Impact of Change This change control form deletes Interim milestones M-037-10, M-037-11, and M-037-13 and creates 10 new interim milestones. NOTE: the TSDs in milestone M-037-10 were added into new milestone M-037-21, the TSDs in milestone M-037-11 were added into new milestone M-037-23, and the TSD in milestone M-037-13 was added into new milestone M-037-24.			
Affected Documents The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site Internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents, Project Management Plans).			
Approvals			
 W.F. Hamel, DOE-RL	03/19/2020 Date	Approved <input checked="" type="checkbox"/>	Disapproved <input type="checkbox"/>
 A.K. Smith, Ecology	3/20/2020 Date	Approved <input checked="" type="checkbox"/>	Disapproved <input type="checkbox"/>
N/A		Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
EPA		Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p>M-037-10 Lead Regulatory Agency: Ecology</p>	<p>Complete Unit Specific Closure Requirements according to the closure plan(s) for six (6) TSD Units: 207 A South Retention Basin, 216 A 29 Ditch, 216 A 36B Crib, 216 A 37-1 Crib, 216 B 63 Trench, and Hexone Storage and Treatment Facility (276 S 141/142).</p>	<p>09/30/2020</p>
<p>M-037-11 Lead Regulatory Agency: Ecology</p>	<p>Complete unit specific closure requirements for two (2) TSD Units: 216 B 3 Main Pond system and 216 S 10 Pond and Ditch.</p>	<p>09/30/2024</p>
<p>M-037-13 Lead Regulatory Agency: Ecology</p>	<p>Complete Unit Specific Closure Requirements according to the closure plan 241 CX Tank System (241 CX 70/71/72).</p>	<p>09/30/2022</p>
<p><u>M-037-20</u> Lead Regulatory Agency: Ecology</p>	<p><u>If requesting the use of alternative requirements for closure of the 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and/or 216-B-63 Trench under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology at the same time as the Proposed Corrective Action Decision/Proposed Plan for the 200-EA-1 OU is submitted to Ecology pursuant to M-015-92B.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information:</u></p> <ol style="list-style-type: none"> 1. <u>Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)-(ii);</u> 2. <u>Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and</u> 3. <u>Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i).</u> 	<p><u>Submit concurrently with M-015-92B</u></p>

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Number	Milestone	Due Date
<p><u>M-037-21</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-EA-1 OU.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).</u></p>	<p><u>Within 270 days of the last CAD/ROD signature for the 200-EA-1 OU</u></p>
<p><u>M-037-22</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>If requesting the use of alternative requirements for closure of the 216-B-3 Main Pond system and/or 216-S-10 Pond and Ditch under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology at the same time as the Proposed Plan for the 200-OA-1 OU is submitted to EPA pursuant to M-015-38B.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information:</u></p> <ol style="list-style-type: none"> <u>1. Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii);</u> <u>2. Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and</u> <u>3. Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i).</u> 	<p><u>Submit concurrently with M-015-38B</u></p>

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Number	Milestone	Due Date
<p><u>M-037-23</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 216-B-3 Main Pond system and 216-S-10 Pond and Ditch. The CC Proposal shall be submitted to Ecology within 270 days of the last ROD signature for the 200-OA-1 OU.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).</u></p>	<p><u>Within 270 days of the last ROD signature for the 200-OA-1 OU</u></p>
<p><u>M-037-24</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 241-CX Tank System (CX-70, CX-71, and CX-72) and Inactive SST Components outside the WMAs. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-IS-1 OU.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).</u></p>	<p><u>Within 270 days of the last CAD/ROD signature for the 200-IS-1 OU</u></p>

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Number	Milestone	Due Date
<p><u>M-037-25</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>If requesting the use of alternative requirements for closure of the Inactive SST Components Outside the WMAs under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology at the same time as the Proposed Corrective Action Decision/Proposed Plan for the 200-IS-1 OU is submitted to Ecology pursuant to M-015-92C.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information:</u></p> <ol style="list-style-type: none"> 1. <u>Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii);</u> 2. <u>Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and</u> 3. <u>Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i).</u> 	<p><u>Submit concurrently with M-015-92C</u></p>

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Number	Milestone	Due Date
<p><u>M-037-26</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>If requesting the use of alternative requirements for closure of any of the Green Island TSD units located in the Low-Level Burial Grounds under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology at the same time as the Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU is submitted to Ecology pursuant to M-015-93B.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information:</u></p> <ol style="list-style-type: none"> 1. <u>Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii);</u> 2. <u>Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and</u> 3. <u>Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i).</u> 	<p><u>Submit concurrently with M-015-93B</u></p>
<p><u>M-037-27</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: Low-Level Burial Grounds Green Islands. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-SW-2 OU.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of the Green Island TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).</u></p>	<p><u>Within 270 days of the last CAD/ROD signature for the 200-SW-2 OU</u></p>

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Number	Milestone	Due Date
<p><u>M-037-28</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for all TSD Units in the 221-B Canyon Facility. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-CB-1 OU.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).</u></p>	<p><u>Within 270 days of the last CAD/ROD signature for the 200-CB-1 OU</u></p>
<p><u>M-037-29</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: PUREX Tunnels 1 and 2 and all TSD Units in the PUREX Canyon Facility. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-CP-1 OU.</u></p> <p><u>The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).</u></p>	<p><u>Within 270 days of the last CAD/ROD signature for the 200-CP-1 OU</u></p>