



U.S. Department of Energy
Office of River Protection

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Richland, Washington 99352

06-TPD-026

MAY 04 2006

Ms. Jane Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99352

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EDMC

Dear Ms. Hedges:

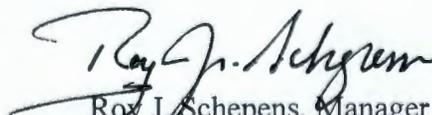
PROPOSED CHANGES TO HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER (HFFACO) TANK FARM CORRECTIVE ACTION MILESTONES
M-45-55, M-45-55-T04, M-45-56, M-45-58, M-45-59, AND M-45-60

Enclosed for your consideration is a draft HFFACO change request proposing changes to the subject milestones. The proposed changes have been discussed with your staff and are provided to you in preparation to starting negotiations on the these milestones.

The proposed changes reflect a major shift in the Vadose Zone Project from producing Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) documentation in Fiscal Years 2006 and 2007 to completing soil characterization necessary for analysis and selection of vadose zone contamination corrective actions. The proposed changes will allow the U.S. Department of Energy, Office of River Protection to test and deploy new subsurface characterization technologies that will result in a more effective characterization program which will, in turn, support soil remedial action in the tank farms, performance assessment modeling for the closure of tank farms, and the decision making process for groundwater remediation. This strategic shift will also better focus the RCRA CA work on the closure of Waste Management Areas.

If you have any questions, you may contact me, or your staff may contact Roger Quintero, Tank Farms Programs and Projects Division, (509) 373-0421.

Sincerely,


Roy J. Schepens, Manager
Office of River Protection

TPD:RAQ

Enclosure

cc: See page 2

Ms. Jane Hedges
06-TPD-026

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MAY 04 2006

cc w/encl:

F. J. Anderson, CH2M HILL

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K. Niles, Oregon Energy

R. Jim, YN

CH2M Correspondence Control

Administrative Record: M-45-55, M-45-55-T04, M-45-56, M-45-58, M-45-59, M-45-60

Environmental Portal, LMSI

**Enclosure
06-TPD-026**

**Draft HFFACO Change Request for Tank Farm Corrective Action
Milestones M-45-55, M-45-55-T04, M-45-56, M-45-58, M-45-59, AND M-45-60**

(3 pages total including coversheet)

Change Number M-45-55/60-06-XX	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date
Originator US DOE-ORP		Phone
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Efficiency modification to combine scope of final Field Investigation Report (M-45-55-T04) and RCRA Field Investigation report (M-45-55), including additional field investigation scope and deferral of the milestone schedule.		
Description/Justification of Change This agreement modification combines M-45-55-T04 the Field Investigation Report (FIR) with M-45-55, the RCRA Field Investigation (RFI) rollup. The schedule for completion of the RFI is deferred to allow for additional soil characterization and analysis of data. Successor milestones (M-45-58 and M-45-60) are also deferred to use the information derived from the use the information derived from the combined FIR-RFI in the subsequent corrective measures planning. New characterization technologies developed during Phase 1 of this milestone series offer improved data quality and cost reduction. The use of Surface Geophysical Exploration and Direct Push technologies have been presented to regulatory staff for use in data collection prior to proceeding with corrective measures planning. The deployment of new technologies and analysis of the data extends the duration of the time needed to collect data for the FIR. Consolidation of the FIR and RFI reduces the amount of time required for document preparation and reporting information needed in milestone M-45-55-T04 and M-45-55.		
M-045-55:	SUBMIT TO ECOLOGY FOR REVIEW AND APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT A PHASE 1 RFI REPORT INTEGRATING RESULTS OF DATA GATHERING ACTIVITIES AND EVALUATIONS FOR ALL SST WMAS, INCLUDING GROUNDWATER MONITORING AND IMPACTS ASSESSMENT USING HANFORD SITE GROUNDWATER MODELS, WITH CONCLUSIONS AND RECOMMENDATIONS. RESULTS FROM WMAS A-AX, AND C and U WILL BE INCLUDED AS APPENDICES TO THE RFI ROLLUP REPORT ADDRESSING THE SST WMAS UNDER RCRA CORRECTIVE ACTION, SO THAT A SINGLE DOCUMENT CONTAINS ALL AVAILABLE INFORMATION FOR THE 200 AREA SST WMAS AND WILL SUPPORT SST RETRIEVAL AND CLOSURE.	Due: 01/31/2007 01/31/2008
M-045-55-T04-	SUBMIT TO ECOLOGY FOR REVIEW AND COMMENT A DRAFT FIELD INVESTIGATION REPORT COMBINING THE RESULTS OF FIELD INVESTIGATIONS AND ANALYSIS FOR WMAS A-AX, C & U- PURSUANT TO THE SITE SPECIFIC SST WMA PHASE 1 RFI/CMS WORK PLAN- ADDENDA FOR WMA A-AX, C AND U.	Due: — 04/30/2006
M-045-58	SUBMIT TO ECOLOGY FOR REVIEW AND APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT A CORRECTIVE MEASURES STUDY FOR INTERIM CORRECTIVE MEASURES FOR ALL SST WMA's (PENDING RESULTS AND CONCLUSIONS IN THE PHASE 1 RFI REPORT-MILESTONE M-45-55 OR SUBSEQUENT RFI REPORTS).	Due: 6/30/2007 9/30/08
M-045-60	SUBMIT TO ECOLOGY FOR REVIEW AND APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT DOE'S RFI/CMS WORK PLAN FOR ALL SST WMAS. THIS RFI/CMS WORK PLAN SHALL DOCUMENT THE ADDITIOAL INTERIM MEASURES AND FURTHER INVESTIGATIONS NEEDED FOR DECISIONS ON RETRIEVAL, CLOSURE, AND CORRECTIVE MEASURES	DUE: 9/30/2007 03/31/2009

FOR ALL SST WMAS.

Impact of Change

The scope of M-45-55-TO4 is combined with M-45-55 (RFI Roll up) and the schedule for completion of the RFI roll up and successor planning for corrective measures is deferred.

Affected Documents

Approvals

_____	_____	_____	_____
DOE	Date	Approved	Disapproved
_____	_____	_____	_____
EPA	Date	Approved	Disapproved
_____	_____	_____	_____
Ecology	Date	Approved	Disapproved