



**Description/Justification of Change (continued)**

This change control form creates four new milestones that provide an approach wherein DOE will provide Ecology with direct access to an agreed upon initial list of documents, records, and data (the “Easy List”) in an accessible electronic repository and with a schedule for implementation. This change control form and the Technical Approach delineated herein will fulfill DOE’s Milestone M-035-09M requirement to “propose implementation schedules (TPA milestones)” by the current due date of September 15, 2023, and completes Milestones M-035-09L and M-035-09K. These new milestones are intended to be implemented as a phased approach that will commence with a “Pilot Project” (Milestones M-035-10 and M-035-11) and proceed to Milestones M-035-12 and M-035-13 which expand the scope of the Technical Approach in the Pilot Project.

The M-035 process in which the Parties conduct ongoing biennial assessments to address data access issues will continue as before, with Milestone M-035-09N due March 31, 2024.

Milestone M-035-13 reflects the intention of the Parties to continue to expand the scope of the Technical Approach through the biennial assessments to eventually include all TSD units listed in TPA Action Plan Appendix B and to build upon the Easy List in the process detailed in the Sample Milestone in the Settlement Agreement to work toward the “Expanded List”. A copy of the Expanded List can be referenced in the Settlement Agreement as Attachment C.

The Parties have agreed to leave Milestone M-035-13 without a set milestone due date. Milestone M-035-13 will be deemed complete upon the Parties’ approval of a change control form (or any multiple) that sets milestone(s) date(s) for inclusion of the Expanded List in the Repository for a subset of TSD units, (i.e., not the entire list of TSD units in TPA Action Plan Appendix B) as agreed by the Parties in a future M-035 biennial assessment. This completion criteria can be accomplished in multiple steps in any sequence as agreed by the Parties.

This will demonstrate the Parties’ ongoing iterative process to expand the Technical Approach through the M-035 biennial assessment process.

**Authorized Changes**

Modifications to TPA 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><b><u>M-035-10</u></b>  <u>Lead Regulatory Agency: Dual</u></p>	<p><u>PILOT PROJECT: DOE shall make documents, records, and data directly accessible to Ecology in an electronic repository in an organized and searchable structure for the following TPA Action Plan, Appendix B, Treatment Storage and Disposal (TSD) Groups/Units:</u></p> <ol style="list-style-type: none"> <li><u>1. Building 2403-WD at the Central Waste Complex</u></li> <li><u>2. The 219-S Tank System</u></li> <li><u>3. Tank-Side Cesium Removal/Low-Activity Waste Pretreatment System (TSCR/LAWPS)</u></li> </ol> <p><u>The documents, records, and data to be added to the repository under this milestone for these TSDs are as follows:</u></p> <ol style="list-style-type: none"> <li><u>a. Manifests for hazardous waste shipments</u></li> <li><u>b. Disposal records for hazardous/mixed waste</u></li> <li><u>c. RCRA container inspections (daily, weekly, monthly)</u></li> <li><u>d. RCRA TSD inspections (daily, weekly, monthly)</u></li> <li><u>e. RCRA emergency equipment inspections</u></li> <li><u>f. RCRA Surveillance and Maintenance Plans (TPA Action Plan, Section 8.0 facilities) and associated inspections</u></li> <li><u>g. Building Emergency Plans</u></li> <li><u>h. Spill logs</u></li> <li><u>i. RCRA related training plans</u></li> <li><u>j. Facility response plans</u></li> <li><u>k. RCRA annual ignitable, reactive surveillance</u></li> </ol> <p><u>The above list represents documents, records and data from the Easy List as applicable to the TSDs covered in Milestone M-035-10.</u></p> <p><u>This milestone applies to the documents, records, and data created after December 31, 2024.</u></p>	<p><u>12/31/2024</u></p>

Number	Milestone	Due Date
<p><b><u>M-035-11</u></b>  <u>Lead Regulatory</u>  <u>Agency: Dual</u></p>	<p><u>PILOT PROJECT: DOE shall make documents, records, and data directly accessible to Ecology in an electronic repository in an organized and searchable structure for the following TPA Action Plan, Appendix B, Treatment Storage and Disposal (TSD) Groups/Units:</u></p> <ol style="list-style-type: none"> <li><u>1. Buildings 2402-WF, 2402-WG, 2402-WH, 2402-WJ, 2403-WL, 2403-WA, at the Central Waste Complex</u></li> <li><u>2. The remainder of the 222-S Dangerous and Mixed Waste Storage Area Operating Unit Group (DMWSA)</u></li> </ol> <p><u>The documents, records, and data to be added to the repository for these TSDs under this milestone are as follows:</u></p> <ol style="list-style-type: none"> <li><u>a. Manifests for hazardous waste shipments</u></li> <li><u>b. Disposal records for hazardous/mixed waste</u></li> <li><u>c. RCRA container inspections (daily, weekly, monthly)</u></li> <li><u>d. RCRA TSD inspections (daily, weekly, monthly)</u></li> <li><u>e. RCRA emergency equipment inspections</u></li> <li><u>f. RCRA Surveillance and Maintenance Plans (TPA Action Plan, Section 8.0 facilities) and associated inspections</u></li> <li><u>g. Building Emergency Plans</u></li> <li><u>h. Spill logs</u></li> <li><u>i. RCRA related training plans</u></li> <li><u>j. Facility response plans</u></li> <li><u>k. RCRA annual ignitable, reactive surveillance</u></li> </ol> <p><u>The above list represents documents, records and data from the Easy List as applicable to the TSDs covered in Milestone M-035-11.</u></p> <p><u>This milestone applies to the documents, records, and data created after December 31, 2025.</u></p>	<p><u>12/31/2025</u></p>

Number	Milestone	Due Date
<p><b><u>M-035-12</u></b>  <u>Lead Regulatory Agency: Dual</u></p>	<p><u>DOE shall submit to Ecology and EPA a change control form with the date by which DOE can provide the documents, records, and data that can be made directly accessible to Ecology in an electronic repository in an organized and searchable structure for the Liquid Effluent Retention Facility/Effluent Treatment Facility (LERF/ETF) Treatment Storage and Disposal (TSD).</u></p> <p><u>The documents, records, and data to be added to the repository for the LERF/ETF TSD under this milestone will be as follows:</u></p> <ul style="list-style-type: none"> <li><u>a. Manifests for hazardous waste shipments</u></li> <li><u>b. Disposal records for hazardous/mixed waste</u></li> <li><u>c. RCRA container inspections (daily, weekly, monthly)</u></li> <li><u>d. RCRA TSD inspections (daily, weekly, monthly)</u></li> <li><u>e. RCRA emergency equipment inspections</u></li> <li><u>f. RCRA Surveillance and Maintenance Plans (TPA Action Plan, Section 8.0 facilities) and associated inspections</u></li> <li><u>g. Building Emergency Plans</u></li> <li><u>h. Spill logs</u></li> <li><u>i. RCRA related training plans</u></li> <li><u>j. Facility response plans</u></li> <li><u>k. RCRA annual ignitable, reactive surveillance</u></li> </ul> <p><u>The above list represents documents, records and data from the Easy List as applicable to the TSDs covered in Milestone M-035-12.</u></p>	<p><u>03/31/2024</u></p>

Number	Milestone	Due Date
<p><b><u>M-035-13</u></b>  <u>Lead Regulatory Agency: Dual</u></p>	<p><u>DOE shall submit to Ecology and EPA a series of change control forms with enforceable interim milestones that follow the same Technical Approach format described in the preceding milestones. These milestones will eventually expand the Technical Approach scope to include in the Repository all of the remaining TSD units listed in TPA Action Plan Appendix B and additional documents, records, and data listed in the Expanded List, as applicable to the respective TSD units.</u></p> <p><u>The Repository will be updated on an ongoing basis as agreed by the parties in the M-035 biennial assessments and documented in implementation schedules in the form of enforceable interim milestones.</u></p> <p><u>Further details will be listed in the TPA Databases Document DOE/RL-93-69, as agreed by DOE and Ecology. DOE will not add or remove any language to the TPA Databases Document DOE/RL 93-69 unless agreed to in advance by Ecology.</u></p> <p><u>This milestone will be deemed complete upon the Parties' approval of a change control form (or any multiple) that sets milestone(s) date(s) for inclusion of the Expanded List in the Repository for a subset of TSD units, (i.e., not the entire list of TSD units in TPA Action Plan Appendix B) as agreed by the Parties in a future M-035 biennial assessment. This completion criteria can be accomplished in multiple steps in any sequence as agreed by the Parties.</u></p>	<p><u>TBD</u></p>