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Change Number C-95-01A	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 06/12/95
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Originator Julie Erickson	Phone 376-3603
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Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title
Redesignation of 100-HR-1 and 100-DR-1 Operable Units (OUs) from RCRA Units to CERCLA Past Practice Units.

Description/Justification of Change
This redesignation of 100-HR-1 and 100-DR-1 OUs from Resource Conservation and Recovery Act Past Practices (RPP) Units to a Comprehensive Environmental Response, Compensation, and Liability Act Past Practice (CPP) Units will facilitate disposal of waste in the Environmental Restoration Disposal Facility (ERDF) in conjunction with the accelerated cleanup adjacent to the Columbia River.

In addition, the documentation to date supports this decision. The milestone M-15-05C, M-15-05D, M-15-07C and M-15-07D identified in the Tri-Party Agreement, Fourth Amendment, January 1994, calls for the CPP documentation on these previously identified RPP units. This change will establish consistency with the regulatory documentation specified in Appendix D of the Tri-Party Agreement. The Tri-Party Agreement Action Plan discusses designation of the operable units. Redesignation of units requires a Federal Facility Agreement and Consent Order Change Control Form.

Impact of Change
Reclassifying the 100-HR-1 OU and the 100-DR-1 OUs as CPP allows for disposition of waste into the ERDF. The 100-HR-1 Operable Unit and the 100-DR-1 OU are currently designated in Appendix C of the Action Plan as RCRA units. Any RCRA hazardous waste generated during the course of a RCRA corrective action at an RPP OU must be disposed of in a RCRA permitted unit. The ERDF will be designed, constructed, and operated to comply with the substantive requirements of the resource Conservation and recovery Act (RCRA). However, the ERDF has only been authorized for the receipt of CERCLA on-site wastes and obtaining a RCRA TSD permit for ERDF is neither required or planned. The lead regulatory responsibility will remain with the Washington State Department of Ecology for these operable units.

Affected Documents
Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix C

Approvals			
DOE	_____	Date _____	___ Approved ___ Disapproved
EPA	_____	Date _____	___ Approved ___ Disapproved
Ecology	_____	Date _____	___ Approved ___ Disapproved

