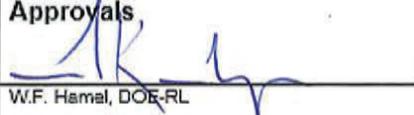


Change Number P-03-19-01	Federal Facility Agreement and Consent Order Change Control Form	Date 06/20/2019	
Originator Mostafa Kamal		Phone 376-0289	
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Modify Tri-Party Agreement (TPA), Action Plan, Section 3.3, Past-Practice Units, to Reflect RCRA Closures as Part of CERCLA Actions			
Description/Justification of Change <p>This change control form modifies the TPA Action Plan, Section 3.3, Past-Practice Units, to be consistent with TPA Action Plan, Section 5.5, Treatment, Storage, and Disposal Units and Past-Practice Units Interface. This change proposes to modify the RCRA Facility Investigation/Corrective Measures (RFI/CM) documents to past-practice documents pursuant to TPA Action Plan, Section 5.5, Treatment, Storage, and Disposal Units and Past Practice Units Interface.</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-05-19-01, Modify 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, • P-07-19-01, Modify TPA, Action Plan, Section 7.4.2, Resource Conservation and Recovery Act Facility Investigation and Remedial Investigation, and • M-37-19-01, Modification of M-037 Series Milestones in TPA Appendix D. 			
Impact of Change No work schedules or milestones are impacted by this change.			
Affected Documents The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), as amended.			
Approvals		Page 1 of 3	
 W.F. Hamal, DOE-RL	03/19/2020 Date		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>
 R.G. Hastings, DOE-ORP	3/18/20 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"/>
DAVID EINAN Digitally signed by DAVID EINAN Date: 2020.04.14 15:12:12 -07'00' D.R. Einar, EPA	Date		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>

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Authorized Changes

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

3.3 Past-Practice Units

A past-practice unit is a waste management unit where wastes or substances (intentionally or unintentionally) have been disposed and that is not subject to regulation as a TSD unit as specified in Section 3.2.

Due to the relatively large number of past-practice units at the Hanford Site, a process has been established for organizing these units into groups called operable units. The concept of operable units is to group the numerous units (primarily by geographic area) into manageable components for investigation and response action and to prioritize the cleanup work to be done at the Site.

The WIDS (see Section 3.5) contains information on waste management units that was used to support the development of operable units. This information, combined with operable unit identification and prioritization criteria described in this section, resulted in the designation of operable units across the Hanford Site (see Appendix C). Each of the operable units will be subject to an investigation in the form of either a CERCLA or a RCRA-CERCLA past-practice process as described in Sections 7.3 and 7.4, respectively. Appendix C includes a list of all the past-practice units on the Hanford Site by operable unit. In addition, current listings of all the past-practice units on the Hanford Site are maintained electronically in the WIDS.

Some TSD units, primarily land disposal units, will be investigated and managed in conjunction with past-practice units and have been assigned to appropriate operable units (see Appendix B for current assignment of TSD groups/units to operable units).¹ The information necessary for performing RCRA closures within an operable unit will be provided in coordination with various ~~past-practice RFI/CMS~~ documents pursuant to Section 5.5. These documents will include a coordinated past practice site investigation/RCRA closure/RCRA corrective action approach in order to efficiently implement applicable regulations. Those TSD units not assigned to an operable unit are typically treatment or storage units that are likely to be “clean closed” as described in Section 6.3.1.

¹ These TSD units have been assigned to appropriate operable units for the sole purpose of coordinating the development and implementation of closure plans for such TSD units with the investigation and remediation of closely associated past-practice units, in accordance with the process described in Action Plan Section 5.5. These assignments are purely administrative in nature and do not in and of themselves subject any TSD unit to the CERCLA decision-making process.

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Individual past-practice units (and selected TSD units) have been assigned to a specific operable unit based on the following criteria:

- General patterns of waste disposal from specific process sources
- Spatial relationship to other waste units
- Contribution to the same groundwater contaminant plume
- Physical characteristics of area (e.g., geologic/hydrogeologic)
- Access considerations (e.g., buildings, buried pipes)
- Anticipation of similar remedial action strategy (economy of scale)
- Reasonable number of total units to effectively manage.

In addition to the operable units discussed above, groundwater operable units can be established where multiple sources from different operable units have contributed to the same plume. Operable units that are associated with a groundwater operable unit are referred to as source operable units. The schedule for investigation of each groundwater operable unit will coincide with the schedule for investigation of the source operable unit that is the major contributor to the plume. Other associated source operable units that are lower priority will be investigated at a later time, in accordance with the established criteria for prioritization of operable units.