

Change Number M-26-95-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 6/19/95
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Originator S. D. Godfrey	Phone (509) 372-0501
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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 Delete Milestones M-26-03 and M-26-04 to Allow Continued Use of LERF
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Description/Justification of Change

This change control form deletes interim milestones M-26-03 and M-26-04 to allow the continued use of LERF for passive treatment (flow and pH equalization) of the 242-A Evaporator Process Condensate. EPA determined that management of the 242-A Evaporator Process Condensate held in the LERF, prior to treatment in the 200 Area Effluent Treatment Facility (ETF), is consistent with the regulatory definition of "treatment" under 40 CFR 260.10 in the context of the 40 CFR 268.4 treatment exemption. The Department of Energy, Richland Operations Office (RL) submitted information to EPA to satisfy the requirements for obtaining a treatment exemption for LERF. The parties agree that the requirements for managing LERF as a treatment facility have been satisfied, that the regulatory requirements for management and closure of LERF will be contained within the Part A and Part B RCRA permit applications, and that interim milestones M-26-03 and M-26-04 have been satisfied to the extent that they can now be deleted.

(Continued on next page)

Impact of Change

Interim Milestones M-26-03 and M-26-04 are deleted by this change to allow the continued discharge of the 242-A Evaporator process condensate to the LERF units for flow and pH equalization (treatment) prior to the final treatment in the ETF. Significant cost savings will be realized over the life of the 242-A Evaporator, LERF, and ETF waste treatment system, as a result of this change. No adverse impacts result from this change.

Affected Documents

Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January, 1994, Appendix D (Table D, page D-56, and Action Plan Work Schedule, page 21 of 40).

Approvals		
<i>[Signature]</i> DOE	6/28/95	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>[Signature]</i> EPA	6/29/95	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>[Signature]</i> Ecology	6-28-95	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved



The revised milestones are as follows:

M-26-03 Cease Discharge of 242-A Evaporator Process Condensate Effluent to LERF Units. To Be Decided By 8/31/95
(Deleted)

DOE may discharge process condensate effluent from the 242-A Evaporator to Liquid Effluent Retention Facility (LERF) units from December 1990 through December 1994 if (1) the placement of such effluent into LERF is necessary for completion of milestones required by the Agreement; (2) interim status authorization includes these units or a RCRA permit covering these units has been issued; (3) the units satisfy the requirements of 40 CFR Part 264, Subpart K, or 40 CFR Part 265, Subpart K; (4) the units maintain a floating cover which minimizes evaporation; (5) the units comply with all applicable hazardous waste requirements; and (6) prior certification of compliance with 40 CFR 268.4(a)(3) is submitted in accordance with 40 CFR 268.4(a)(4). Discharges of effluent containing hazardous waste subject to the land disposal restrictions other than process condensate from the evaporator to LERF is prohibited.

M-26-04 Remove All Hazardous Waste Residues From the 242-A Evaporator LERF Units. To Be Decided By 8/31/95
(Deleted)

Remove all hazardous waste residues (including any liquid waste) that do not meet LDR treatment standards and applicable prohibition levels imposed by regulation or statute and residues from wastes prohibited from land disposal where no treatment standards have been established and no prohibition levels apply, or which are not delisted pursuant to 40 CFR 260.22 and WAC 173-303-072.