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**Department of Energy**

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

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SEP 15 1994

94-PRD-024

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. Roger F. Stanley, Director  
Tri-Party Agreement Implementation  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Stanley:

**HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)  
CHANGE REQUEST FOR 200-UP-02**

Please find enclosed the M-15-94-03 change request which coordinates the 200-UP-02 Source Operable Unit (OU) and Resource Conservation and Recovery Act (RCRA) Past-Practice work with the 216-U-12 Crib Closure work. The change request reflects changes as dispositioned below based on comments received from the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency. 38871

Issue 1 was the inclusion of a matrix in the Limited Field Investigation Report showing where the RCRA Closure Plan chapters would be found. Ecology requested that the change request name the OU documents that will cover the closure plan requirements.

Issue 2 requested that the complete closure plan be included with the final submittal of the final draft Interm Remedial Measures proposed plan.

The change request has been reviewed and discussed by the appropriate RCRA Past-Practice and RCRA Closure Unit Managers and agreed upon. It is requested that the change request be signed by the Hanford Project Managers before the next Project Managers' meeting. Approval is requested by September 15, 1994, to ensure the increased scope is planned for in the current FY95 budget planning process for the 200-UP-02 Source OU. If the change request is signed at a later date, the milestone date may need to be changed accordingly.

Messrs. Sherwood and Stanley  
94-PRD-024

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SEP 15 1994

If you have any questions regarding this change request, please contact Ms. Beth Ward on (509) 376-7142.

Sincerely,

*Robert S. Holt*

Steven H. Wisness  
Hanford Project Manager

PRD:JFY

Enclosure

cc w/encl:  
M. Galgoul, BHI  
J. Hajner, BHI  
M. Jaraysi, Ecology  
J. Laws, BHI  
R. Morrison, WHC  
R. Person, EM-442 (2)  
D. Sickle, BHI  
N. Uzeimbo, Ecology  
J. Zoghbi, BHI

Change Number M-15-94-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date Aug. 25, 1994												
Originator B. A. Ward		Phone 376-7142												
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager														
Change Title Establishment of Interim Milestones for 200-UP-2 Operable Unit (OU) Documents, and Integration of 216-U-12 Crib Closure/Postclosure Plan with 200-UP-2 OU Project														
Description/Justification of Change: <u>Description</u> A 216-U-12 Crib Closure/Postclosure Plan will be submitted in coordination with 200-UP-2 Operable Unit Documents. An outline will be included in the Limited Field Investigation (LFI) Report that shows the manner in which RCRA Closure/Postclosure requirements will be met in the overall sequence of documents. The Closure Plan will continue to be finalized in coordination with the Operable Unit Focused Feasibility Study Report and the Interim Remedial Measure Proposed Plan. The goal is to have a proposed selected remedy that has been coordinated with the RCRA and CERCLA processes. In addition the interim milestone for submittal of validated data is included.  Continued on next page														
Impact of Change The change will result in a cost effective utilization of resources, the proper focusing of resources, and will result in no significant impact to protection of human health or the environment.														
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Table D and the Work Schedule.														
Approvals <table border="0"> <tr> <td data-bbox="178 1732 660 1816"> <i>Robert J. Holt</i>                      DOE                 </td> <td data-bbox="685 1732 867 1816">                     9/15/94                      Date                 </td> <td data-bbox="883 1753 1032 1795"> <input checked="" type="checkbox"/> Approved                 </td> <td data-bbox="1065 1753 1247 1795"> <input type="checkbox"/> Disapproved                 </td> </tr> <tr> <td data-bbox="178 1795 660 1900"> <i>Douglas R. ...</i>                      EPA                 </td> <td data-bbox="685 1795 867 1900">                     9/15/94                      Date                 </td> <td data-bbox="883 1816 1032 1858"> <input checked="" type="checkbox"/> Approved                 </td> <td data-bbox="1065 1816 1247 1858"> <input type="checkbox"/> Disapproved                 </td> </tr> <tr> <td data-bbox="178 1879 660 1984"> <i>Kevin Stanley</i>                      Ecology                 </td> <td data-bbox="685 1879 867 1984">                     9-15-94                      Date                 </td> <td data-bbox="883 1900 1032 1942"> <input checked="" type="checkbox"/> Approved                 </td> <td data-bbox="1065 1900 1247 1942"> <input type="checkbox"/> Disapproved                 </td> </tr> </table>			<i>Robert J. Holt</i> DOE	9/15/94 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	<i>Douglas R. ...</i> EPA	9/15/94 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	<i>Kevin Stanley</i> Ecology	9-15-94 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
<i>Robert J. Holt</i> DOE	9/15/94 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved											
<i>Douglas R. ...</i> EPA	9/15/94 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved											
<i>Kevin Stanley</i> Ecology	9-15-94 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved											

Description (continued)

Revise the Hanford Federal Facility Agreement and Consent Order Action Plan by adding new interim milestones as follows:

M-15-15A	Submit validated chemical and radiochemical data for 200-UP-2 borings 299-W19-94, 95, 96, 97, and 98, 299-W22-78, 299-W23-231, 216-U-10 Pond Test Pit #2, and 216-U-8 Crib Effluent Pipeline Integrity Investigation to the EPA and Ecology.	June 30, 1994
M-15-15B	Submit the Draft 200-UP-2 Limited Field Investigation Report to the EPA and Ecology for review.	June 30, 1995
M-15-15C	Submit the Draft 200-UP-2 Focused Feasibility Study (FFS) Report to Ecology and EPA for Review.	April 30, 1996
M-15-15D	Submit the Draft 200-UP-2 Interim Remedial Measures (IRM) Proposed Plan to Ecology and EPA for Review.	April 30, 1996
M-15-15E	Issue final draft 200-UP-2 Limited Field Investigation (LFI) Report, final draft FFS Report, and final draft IRM Proposed Plan (this sequence of documents will include the requirements of the 216-U-12 RCRA Closure/Postclosure Plan) to Ecology and EPA. The LFI Report, FFS Report, and IRM Proposed Plan will each undergo regulator review and comment incorporation to produce an approved document. Each document that addresses RCRA closure will be structured such that the RCRA closure aspects can be readily identified for a separate review/approval process.	Dec. 31, 1996

Revise Action Plan, Appendix D, Table D as follows:

M-20-37	Submit 216-U-12 Crib Closure/Postclosure Plan to Ecology and EPA in coordination with the LFI Report of Operable Unit 200-UP-2.	June 30, 1995
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The submittal of a Limited Field Investigation (LFI) Report on June 30, 1995 will include an outline that shows the manner in which the 216-U-12 RCRA Closure/Postclosure requirements will be met in the overall sequence of documents. Selected chapters of the 216-U-12 RCRA Closure/Postclosure Plan will also be included in this June 1995 submittal. Additional Closure Plan chapters and/or requirements will be part of the FFS Report and IRM Proposed Plan (Due April 1996).

Justification

It is proposed that the RCRA/CERCLA coordination process for the 200-UP-2 Operable Unit proceed to an equivalent point within each system. The process will begin with the LFI Report and continue through the final draft IRM Proposed Plan. An outline will be provided in the LFI Report which illustrates how the 216-U-12 RCRA Closure/Postclosure Plan requirements are addressed in the overall sequence of documents. Selected chapters of the 216-U-12 RCRA Closure/Postclosure Plan will also be included in the LFI Report. The final draft 200-UP-2 LFI report, the final draft FFS Report, and the final draft IRM Proposed Plan will meet the 216-U-12 RCRA Closure/Postclosure Plan requirements and will represent plans for action.

The Closure/Postclosure Plan will undergo a RCRA mandated review. The LFI Report, FFS Report and the IRM Proposed Plan will undergo comment resolution. The documents received on December 31, 1996, under M-15-15E, will have completed regulatory review cycle and be generated as Revision 0 documents. These documents will be scheduled for public comment based on work priorities negotiated between RL and the regulators. The mechanism for public comment will be through their submittal as a draft Site Wide Permit modification and a public comment period.

These final documents and the public comments will be used to determine the timing, selection, and initiation of the remediation in the 200-UP-2 Operable Unit.

In addition, the interim milestone is added for submittal of validated chemical and radiochemical data for 200-UP-2 borings 299-W19-94, 95, 96, 97, and 98, 299-W22-78, 299-W23-231, 216-U-10 Pond Test Pit #2, and the 216-U-8 Crib Effluent Pipeline Integrity Investigation to the regulators in report form by June 30, 1994. The 216-U-10 Pond Test Pit #1 has been changed from a test pit to boring 299-W23-231 based on the results of preliminary data from test pit #2.