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Change Number M-15-94-09	<b>Federal Facility Agreement and Consent Order          Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date May 1, 1995												
Originator Nancy Uziemblo		Phone 736-3014												
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager														
Change Title M-15-00 Modification (1994 Refocusing Negotiations)														
Description/Justification of Change <u>Justification of Change:</u> <p>From the direction of Tri-Party commitments to rebaseline USDOE's Environmental Restoration (ER) Program, the need to refocus and reprioritize ER activities, and the need to achieve the "bias-for-action" as stated in the Hanford Past Practice Strategy, the M-15-00 milestone is rewritten to speed progress in achieving stakeholder values including protecting the Columbia River, implementing aggressive remedial actions, and making land available for other uses. The actions for this approach will include moving a milestone from M-13-00 to M-15-00, modifying M-15-00, stating priorities for clean-up of the Hanford site, and coordinating the submittal of Hazardous Waste Facility Treatment, Storage and/or Disposal (TSD) Unit Closure/Postclosure Plans with operable unit work plans (or other equivalent document). This revised course of action will result in a more effective Environmental Restoration Program.</p> <p>See attached Description/Justification of Change continued on Page 2.</p>														
Impact of Change <p>The M-15-00 milestone is defined to show priority of ER activities, achieve earlier remediation, and focus on remediation of sites along the Columbia River. The following activities &amp; impacts are addressed on the attached pages:</p> <ol style="list-style-type: none"> <li>1. Columbia River/Groundwater Activities;</li> <li>2. 100, 200, and 300 Area Activities;</li> <li>3. 200 Area Groundwater Activities;</li> <li>4. No impact to ongoing 200 area source operable unit work.</li> </ol> <p>Remediation schedules will be set through the Remedial Design/Remedial Action (RD/RA) process as enforceable milestones with appropriate target dates in order to effectively drive work and allow measurement of progress. Closure of the 6 Tank Farm Operable Units (200-UP-3, 200-TP-5, 200-TP-6, 200-RO-4, 200-PO-3, 200-BP-7) will be addressed under M-45-00.</p>														
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan and Appendices B, C & D.														
Approvals <table border="0"> <tr> <td><i>John D. Wagner</i></td> <td><u>5/1/95</u></td> <td><input checked="" type="checkbox"/> Approved</td> <td><input type="checkbox"/> Disapproved</td> </tr> <tr> <td><i>Cheryl Clark</i></td> <td><u>5/8/95</u></td> <td><input checked="" type="checkbox"/> Approved</td> <td><input type="checkbox"/> Disapproved</td> </tr> <tr> <td><i>Mary Reiland</i></td> <td><u>5/9/95</u></td> <td><input checked="" type="checkbox"/> Approved</td> <td><input type="checkbox"/> Disapproved</td> </tr> </table>		<i>John D. Wagner</i>	<u>5/1/95</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	<i>Cheryl Clark</i>	<u>5/8/95</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	<i>Mary Reiland</i>	<u>5/9/95</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	
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Description/Justification of Change (continued)

**1. COLUMBIA RIVER/GROUNDWATER ACTIVITIES**Description/Justification of Change:

Columbia River initiatives are identified as high priority activities by Hanford stakeholders, public, and Native American Indian Tribes. The Columbia River Comprehensive Impact Assessment is moved from a M-13-00 to a M-15-00 milestone to direct completion of this assessment. Groundwater remediation strategies are clarified.

MILESTONE	DESCRIPTION	DATE
M-15-80	Submit the Columbia River Comprehensive Impact Assessment to EPA and Ecology (Human Health and Environment Risk Assessment) [formerly M-13-80B].	submittal date to be determined no later than 12/15/95
M-15-81A	Provide a report to the EPA and Ecology, including recommendations for actions for approval by Ecology and EPA, to coordinate regulatory compliance decisions across RCRA & CERCLA Groundwater monitoring programs for the 200 Area Plateau. The report shall: (1) Evaluate: (a) the effects of pump and treat systems on existing groundwater monitoring; (b) the effects of ceasing discharge to the soil column (Milestone M-17-00) on existing groundwater monitoring; (c) the effects of the rerouting of liquid discharges to the soil column on existing groundwater monitoring systems; and, (2) Incorporate the impacts of groundwater remediation and liquids management as described in the Hanford Groundwater Remediation Strategy and the Hanford Groundwater Protection Management Plan.	12/31/95
M-15-81B	Submit to the EPA and Ecology, a document to support future Feasibility Studies describing: the known nature and extent of Iodine-129 contamination in the 200 Area Plateau (soil and groundwater); potential Applicable or Relevant and Appropriate Requirements (ARARS); and available treatment methods; including costs and efficiencies.	4/30/96

## Description/Justification of Change (continued)

Impact of Change:

The submittal of the Columbia River Comprehensive Impact Assessment to EPA and Ecology (Human Health and Environment Risk Assessment) [formerly M-13-80B] is a milestone which was left as TBD in the Fourth Amendment of the Tri-Party Agreement. The submittal of this assessment and cited groundwater strategies are expected to reinforce commitments to stakeholders regarding the high priority of monitoring and ceasing contaminant discharges to area groundwater.

## 2. 100, 200, AND 300 AREA ACTIVITIES

Description/Justification of Change:

Dates are set for the completion of 100, 200, and 300 Area Operable Unit past practice site investigations in order to ensure continued progress in characterization and remediation in these areas. The three agencies have a goal of issuing Records of Decision by 12/31/96 for all twenty 100 and two 300 Area Operable Units currently under investigation. There is an additional goal of issuing RODs for the remaining five 100 Area Operable Units and one 300 Area Operable Unit by the year 2000.

MILESTONE	DESCRIPTION	DUE DATE
M-15-00	Complete RI/FS (or RFI/CMS) process for all Operable Units	12/31/2008
M-15-00A	Complete all remaining 100 Area Operable Unit pre-ROD site investigations under approved work plan schedules (100-KR-2, 100-KR-3, 100-FR-2, 100-IU-2, and 100-IU-6).	12/31/99
M-15-00B	Complete all 300 Area Operable Unit pre-ROD site investigations under approved Work Plan schedules.	12/31/99
M-15-00C	Complete all 200 Area non-Tank Farm Operable Unit pre-ROD site investigations under approved Work Plan schedules.	12/31/2008

Impact of Change:

The determination of 100, 200 and 300 Area investigation completion dates allows for a definitive course of action. Significant changes are made in the ER program to prioritize the 100 and 300 Area cleanup. All interim milestones will be implemented as stated in approved Work Plans. Closure of the 6 Tank Farm Operable Units (200-UP-3, 200-TP-5, 200-TP-6, 200-RO-4, 200-PO-3, 200-BP-7) will be addressed under M-45-00.

Description/Justification of Change (continued)

**3. 200 AREA GROUNDWATER ACTIVITIES**Description/Justification of Change:

200 Area Groundwater investigations, remediation, and pump and treat activities will continue in order to address tribal and stakeholder key values of dealing realistically and forcefully with groundwater contamination. Pump and treat activities will continue at 200-BP-5, 200-UP-1, and 200-ZP-1 under M-13-06A, M-13-02A, and M-13-04A, respectively. Milestones are established to follow through on these activities for Interim Remedial Measure (IRM) plume remediation and non-IRM plume investigation through approved schedules in the Work Plan.

MILESTONE	DESCRIPTION	DUE DATE
M-15-21	Evaluate results of M-13-06A and submit Proposed IRM Plan for 200-BP-5.	10/31/95
M-15-17	Submit Proposed IRM Plan for Uranium, Technetium-99 and Nitrate for 200-UP-1.	4/30/95

Impact of Change:

The establishment of these two 200 Area proposed groundwater milestones sets firm dates to examine the performance of these groundwater remediation efforts.

**4. 200 AREA SOURCE OPERABLE UNIT ACTIVITIES**Description/Justification of Change:

There is no impact to ongoing 200 Area source operable unit work. Implementation of continued work will follow schedules in approved work plans and/or other approved documents. The ongoing 200 Area source operable units are 200-UP-2, 200-BP-11, 200-BP-1, and 200-ZP-2.