

START

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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
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Originator B. A. Ward	Phone 376-7142
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Class of Change
 I - Signatories II - Project Manager 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

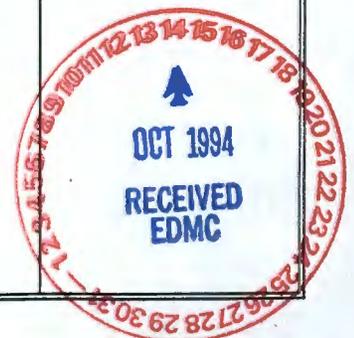
Description/Justification of Change:
Description
 A 216-U-12 Crib Closure/Postclosure Plan will be submitted in coordination with 200-UP-2 Operable Unit Documents. An outline will be included in the Limited Field Investigation (LFI) Report that shows the manner in which RCRA Closure/Postclosure requirements 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	
Robert S. Holt DOE Date 9/15/94	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Douglas R. Sherwood EPA Date 9/15/94	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Roger Stanley Ecology Date 9-15-94	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved



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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).

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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.

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DON'T SAY IT --- Write It!

DATE: September 16, 1994

TO: J. H. Anderson B3-62
L. D. Arnold B2-35
D. M. Eder B3-62
W. C. Floberg G1-76
R. S. Hajner H4-79
S. D. Liedle H4-79
P. J. Mackey B3-15
H. A. Myers B3-75
R. P. Prosser H6-07
K. R. Rowe H6-29
D. L. Sickle H4-79
A. J. Watts B3-75
J. F. Young A5-19
EPIC H6-08

FROM: R. D. Morrison B2-35
Telephone: 376-6574

cc: RDM File
OSK File
TPA File

SUBJECT: APPROVED HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE REQUEST M-15-94-03

Attached for your information is an unofficial copy of approved Hanford Federal Facility Agreement and Consent Order change request "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.

If you have any questions, please call me on 376-6574

ceg

Attachment

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4924 4626 476