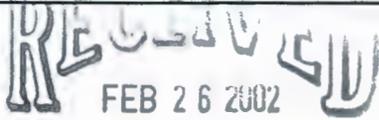


Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)



EDMC

Proposed Tri-Party Agreement Modifications and Reference Documents for

**Hanford's 200 Area Central Plateau
Waste Site Cleanup**

**Environmental Restoration Project
(M-013-02-01, M-015-02-01,
M-016-02-01, M-020-02-01)**

Public Comment Period
February 25 to April 12, 2002



Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)

Proposed Modifications and Reference Documents for

**Hanford's 200 Area Central Plateau Waste Site Cleanup
(M-013-02-01, M-015-02-01, M-016-02-01, M-020-02-01)**

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**TENTATIVE AGREEMENT ON NEGOTIATIONS
FOR THE CENTRAL PLATEAU PROJECT**

In accordance with the requirements of the Central Plateau Project Agreement in Principle, the State of Washington, Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), and the U.S. Department of Energy (USDOE) (parties) have concluded negotiations on commitments for cleanup schedules for the Central Plateau 200 Area non-tank farm operable units at the Hanford Site. The scope of the negotiations addressed commitments for the submittal of 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans by December 31, 2005, (Tri-Party Agreement Milestone M-013); completion of all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008, (Tri-Party Agreement Major Milestone M-015-00C); completion of the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submittal of Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.

Tentative agreement was reached and proposed change packages developed in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). The parties found the proposed Tri-Party Agreement Change Requests mutually acceptable. The proposed Tri-Party Agreement change packages are included as an attachment to this Tentative Agreement. Subject to public comment, a decision on the Tri-Party Agreement Change Requests is anticipated by June 5, 2002.

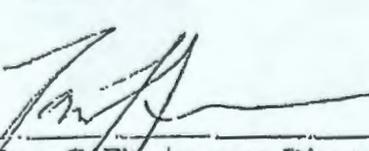
The parties have identified improvements by continuing to apply a risk-based approach to prioritizing the work needed to achieve timely remediation of the 200 Area non-tank farm soil waste sites. This resulting Tentative Agreement sets schedules for the work needed to complete waste site soil investigations, develop feasibility studies and proposed plans for clean-up actions and revise existing RI/FS workplans as appropriate. The parties have committed to focus cleanup on high-risk waste sites first where known or potential contributors to groundwater contamination exist.

Continued on page 2.

Approved this 21 day of February 2002.



Keith A. Klein, Manager
U.S. Department of Energy
Richland Operations Office



Tom C. Fitzsimmons, Director
State of Washington
Department of Ecology



L. John Iani
Regional Administrator
U.S. Environmental
Protection Agency, Region 10

The parties will submit the proposed change packages for a 45-day public comment period to run from February 25, 2002, through April 12, 2002. Following conclusion of the public comment period, a response to comments document will be prepared and issued, change requests modified as appropriate and a Conclusion Agreement approved by the Signatories. Following that approval, the Tri-Party Agreement Change Requests will be incorporated into the Tri-Party Agreement.

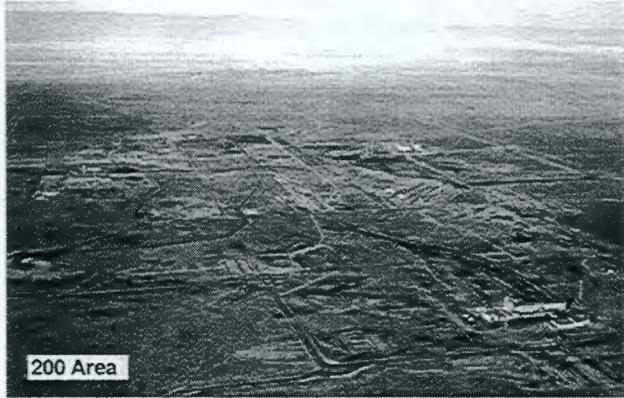
It should be noted that groundwater operable units are excluded from these negotiations and milestone obligations concerning groundwater are excluded and unaffected by these negotiations. Following completion of these negotiations, the parties are committed to timely discussion on how USDOE will meet existing groundwater commitments. EPA and Ecology share regulatory authority for activities addressed under this Tentative Agreement. Neither this agreement, nor the modifications made pursuant to this agreement, shall preclude consideration of alternative mechanisms for completing appropriate RCRA TSD Closure in accordance with WAC-173-303-610(1)(d).

The USDOE Office of River Protection (ORP) Manager's signature is not required on this Tentative Agreement since no commitments were made that impact ORP.



Proposed Schedule Changes for Hanford's 200 Area Central Plateau Waste Site Cleanup

U.S. Department of Energy • U.S. Environmental Protection Agency • Washington State Department of Ecology



The Tri Party Agencies need your input on the proposed schedule for work being done in the 200 Area Central Plateau of the Hanford Site.

The public comment period on the draft change packages will be held from February 25 through April 12, 2002.

The agencies responsible for Hanford cleanup want your input on proposed changes to the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) that will set schedules for cleaning up soil waste sites, not associated with tanks, on Hanford's Central Plateau, also known as the 200 Area (see map).

The U.S. Department of Energy, Richland Operations Office (USDOE), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology) conducted a thorough review of the current cleanup approach and identified improvements to accelerate cleanup of these waste sites.

The agencies have reached a tentative agreement that sets the schedules for completing waste site investigations and for evaluating cleanup options.

A risk-based approach to prioritizing work will be applied to the waste site cleanup. Following completion of these negotiations, the Tri-Party Agencies are committed to conducting timely discussions on how the USDOE will meet existing commitments to clean up groundwater.

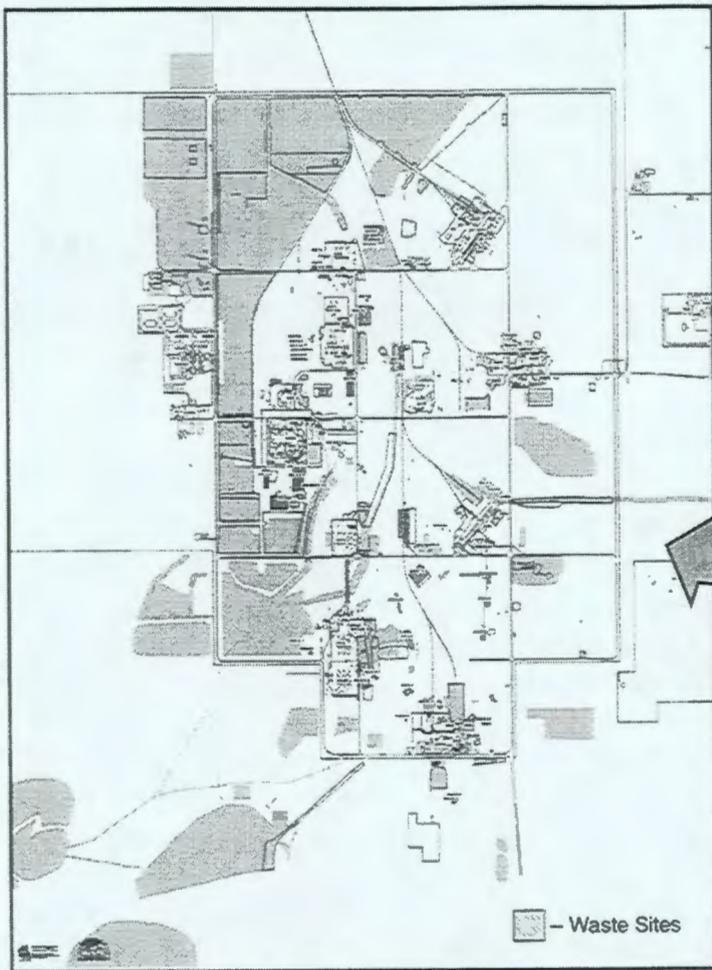
What we are proposing...

There are over 700 soil waste sites that fall within 9 major waste categories (e.g., process waste, landfills). The waste sites are grouped into 22

operable units based on combinations of the major waste categories and contaminant sources. For the remedial investigation/feasibility study process, the waste sites can be further consolidated to 12 distinct groupings (due to similarities between contaminant sources). This reduction of the number of waste site groupings allows for substantial savings by reducing the number of reports necessary to address all of the waste sites, while still providing the information needed to achieve effective cleanup.

As a result of the negotiations, four change packages have been issued that propose the following:

- Streamlining the approach for investigating (or characterizing) the contamination contained within waste sites located on the Central Plateau and grouping similar waste sites together in order to be more efficient in the investigation and decision-making process. The existing milestone date for completing the work plans describing these investigations would be accelerated by one year to December 2004.
- Retaining the existing milestone to complete all non-tank farm site investigations by December 2008, while modifying interim milestones to streamline and focus the investigation process, the feasibility study, and proposed plan/permit modification. A new interim milestone has been proposed to evaluate cleanup of high-priority waste sites suitable for applying a surface barrier and monitoring its performance.



200 West Area

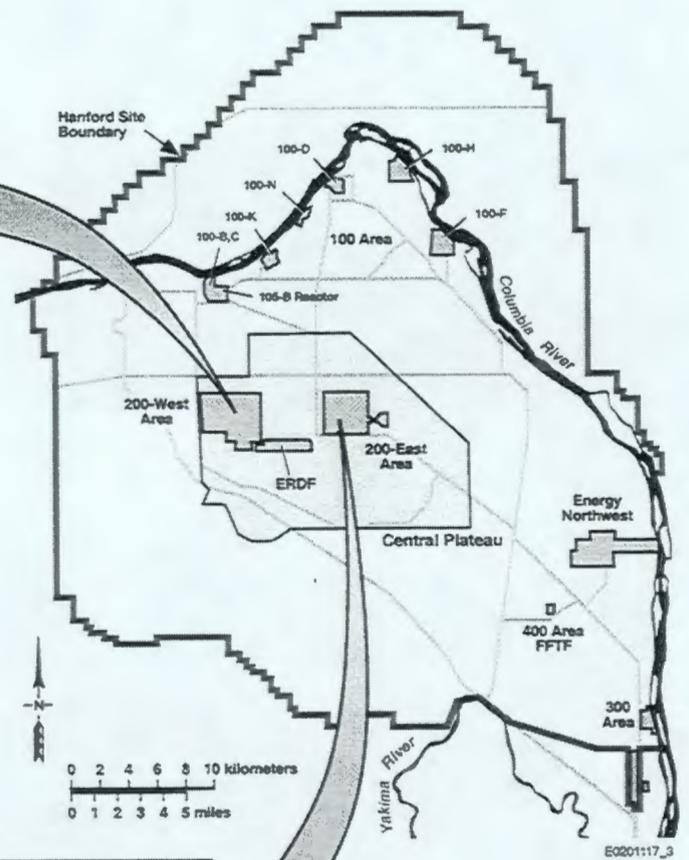
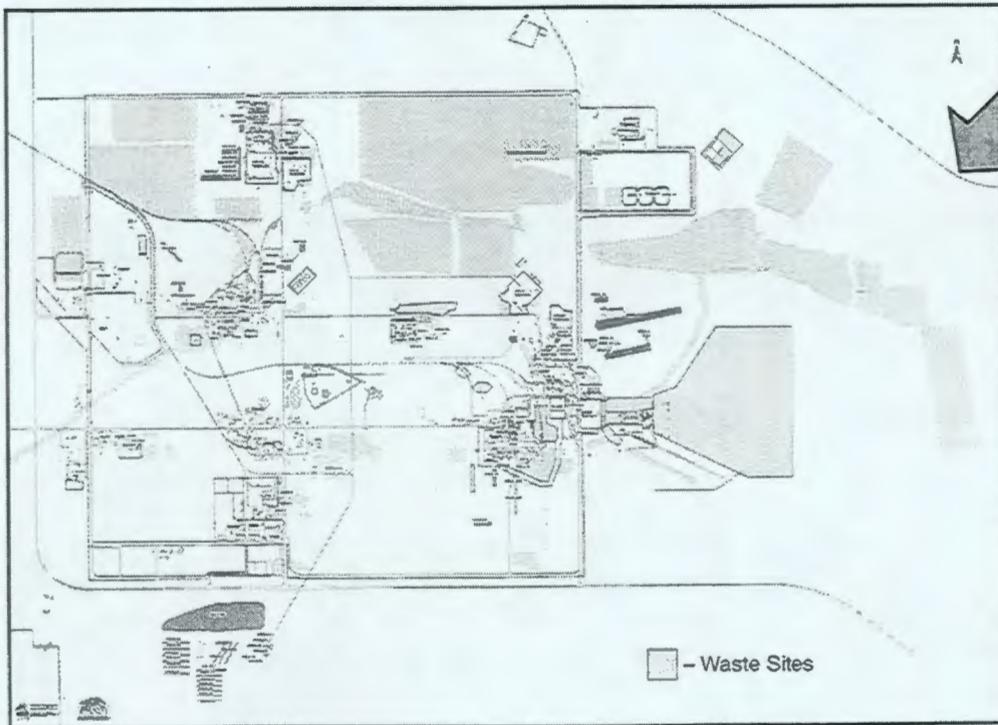


Figure 1. Hanford Site Map.



200 East Area

- Completing all closure and postclosure plans for treatment, storage, and disposal units by December 31, 2008. The closure and postclosure plans will be coordinated with completion of the feasibility studies and proposed plans/permit modifications for the 200 Area waste sites. This extends the current milestone date by 4 years; however, by having the submittal of the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) (known as "Superfund") proposed plan and *Resource Conservation and Recovery Act* (RCRA) plan coincide, it allows consistency in the decision-making process.
- Extending the final cleanup schedule for all Central Plateau waste sites to coordinate with the single-shell tank closure in 2024.

Why are these changes being proposed?

The milestone changes provide a logical approach for prioritizing the investigations (characterization) of waste sites using "lessons learned" from cleanup in the 100 and 300 Areas at Hanford. The reduction in the number of reports will save money by eliminating redundant activities. These proposed changes will make the 200 Area waste site cleanup more effective and focused on reducing health risks and expediting the environmental restoration of the Central Plateau.

How you can become involved...

A public comment period on the draft change packages will be held from February 25 through April 12, 2002. The Tri-Parties need your comments on these proposed changes to the Tri-Party Agreement. Your comments will provide feedback that could influence the final decision on these proposed changes. The agencies will consider all public comments before the proposed changes are made final.

To submit comments or request a copy of the change package, please contact:

Bryan Foley

U.S. Department of Energy
 Richland Operations Office
 P.O. Box 550 (A6-38)
 Richland, WA 99352
 (509) 376-7087
 e-mail: bryan_l_foley@rl.gov

The change packages are also available on our web site at www.hanford.gov/tpa/changelist.htm

Hanford Public Information Repository Locations

Portland

Portland State University
 Branford Price and Millar Library
 934 SW Harrison
 Attn: Michael Bowman (503) 725-3690

Richland

U.S. Department of Energy Public Reading Room
 Washington State University, Tri-Cities
 Consolidated Information Center, Room 101-L
 2770 University Drive
 Attn: Terri Traub (509) 372-7443

Seattle

University of Washington
 Suzzallo Library
 Government Publications Division
 Attn: Eleanor Chase (206) 543-4664

Spokane

Gonzaga University Foley Center
 East 502 Boone
 Attn: Sarah Nelson (509) 323-6548

Information Repository web site address:
<http://www2.hanford.gov/arpir/>

Or call the Hanford Cleanup Line at 1-800-321-2008

Change Number M-13-02-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 2/11/2002																		
Originator P. M. Knollmeyer, Assistant Manager Central Plateau		Phone 376-7435																		
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																				
Change Title Modification of the Central Plateau 200 Area Non-Tank Farm Remedial Action Work Plans (M-013 Series Milestones)																				
Description/Justification of Change <p>The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.</p> <p>USDOE, the U.S. Environmental Protection Agency, and the State of Washington, Department of Ecology (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and the parties will provide the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties agreed to a strategy for timely waste site remediation of the non-Tank Farm, RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau.</p> <p>The parties signed an Agreement in Principle (AIP) that calls for the parties to complete negotiations and sign a Tentative Agreement by January 31, 2002, and commits the parties to complete public comment/review and agency approval by June 5, 2002.</p> <p>Continued on Pages 2 through 3.</p>																				
Impact of Change Accelerates the timetable to complete delivery of Work Plans. Reflects fewer work plans to cover same workscope.																				
Affected Documents The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).																				
Approvals <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-bottom: 1px solid black;"></td> <td style="width: 15%; border-bottom: 1px solid black;"></td> <td style="width: 55%; text-align: center;">_____ Approved _____ Disapproved</td> </tr> <tr> <td>K. A. Klein, RL Manager</td> <td style="text-align: center;">Date</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">_____ Approved _____ Disapproved</td> </tr> <tr> <td>L. J. Iani, EPA Region 10 Administrator</td> <td style="text-align: center;">Date</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">_____ Approved _____ Disapproved</td> </tr> <tr> <td>T. C. Fitzsimmons, Ecology Director</td> <td style="text-align: center;">Date</td> <td></td> </tr> </table>					_____ Approved _____ Disapproved	K. A. Klein, RL Manager	Date				_____ Approved _____ Disapproved	L. J. Iani, EPA Region 10 Administrator	Date				_____ Approved _____ Disapproved	T. C. Fitzsimmons, Ecology Director	Date	
		_____ Approved _____ Disapproved																		
K. A. Klein, RL Manager	Date																			
		_____ Approved _____ Disapproved																		
L. J. Iani, EPA Region 10 Administrator	Date																			
		_____ Approved _____ Disapproved																		
T. C. Fitzsimmons, Ecology Director	Date																			

Description/Change (Continued)

The M-013 series milestones includes schedules for the submittal of work plans for accomplishing necessary work to complete all 200 Area non-Tank Farm past-practice waste site investigations. The *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*, established an approach for investigating the waste sites. Under this plan, approximately 700 waste sites were grouped into 23 process-based operable units (OUs), which in turn were grouped into 9 major waste categories (e.g., process waste, landfills). Each of the 23 OUs were scheduled in the TPA to have work plans developed under the M-013 series milestone. One OU was included in the *100 Area Remaining Sites Record of Decision*. For the remaining 22 operable units, the three agencies have jointly developed an improved approach for the completion of the RI/FS process and subsequent remediation of the waste sites based on lessons learned from Hanford's 100 and 300 Areas.

The revised investigation approach is to evaluate one or more OUs in a single RI/FS. This reduces the number of work plans, remedial investigation reports, and feasibility studies from 22 to 12. The revised approach is able to collect data necessary to adequately characterize the waste sites and evaluate effective remedial alternatives. Under this approach, all of the RCRA TSDs identified in the M-020 series milestones will be sampled to comply with RCRA Closure/Post Closure requirements. These improvements will be incorporated into a revision of the *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*. Of the 12 RI/FS, 5 have approved work plans and 4 are in the final stages of the approval process. All completed work plans will be revised to reflect OU consolidation. The three remaining work plans will be completed under Tri-Party Agreement Major Milestones M-013-00M, M-013-00N, M-013-00O. Because the last work plan will be submitted under Tri-Party Agreement Milestone M-013-00O, the M-013-00P milestone is not required and will be deleted.

RI/FS Grouping of OUs	Major Waste Category	Work Plan Status	Approved Work Plans Requiring Modification
200-CW-1 Gable Mountain/B-Pond & Ditch Cooling Water Group*	Steam Condensate, Cooling Water and Chemical Sewer Waste (SC/CW/CSW)	Approved	X
200-TW-1 Scavenged Waste Group	Tanks/Scavenged Waste	Approved	X
200-TW-2 Tank Waste Group 200-PW-5 Fission Product-Rich Process Waste Group	Tanks/Scavenged Waste Process Condensate and Process Waste (PC&PW)	Approved	X
200-CW-5 U Pond/Z-Ditches Cooling Water Group	SC/CW/CSW	Approved	X
200-CW-2 S-Ponds/Ditches Cooling Water Group	SC/CW/CSW		
200-CW-4 T-Ponds/Ditches Cooling Water Group	SC/CW/CSW		
200-SC-1 Steam Condensate Group	SC/CW/CSW		
200-CS-1 Chemical Sewer Group	SC/CW/CSW	Approved	
200-PW-2 Uranium-rich Process Waste Group	PC&PW	App. In Process	
200-PW-4 General Process Waste Group	PC&PW		

RI/FS Grouping of OUs	Major Waste Category	Work Plan Status	Approved Work Plans Requiring Modification
200-PW-1 Plutonium/Organic-Rich Process Waste Group	PC&PW	App. In Process	
200-PW-3 Organic-rich Process Waste Group	PC&PW		
200-PW-6 Plutonium Process Waste Group	PC&PW		
200-LW-1 300 Areas Chemical Laboratory Waste Group	Chemical Laboratory Waste (CLW)	App. In Process	
200-LW-2 200 Areas Chemical Laboratory Waste Group	CLW		
200-MW-1 Miscellaneous Waste Group	Miscellaneous Waste	App. In Process	
200-IS-1 Tanks/Lines/Pits/Boxes Waste Group	Tanks/Lines/Pits/Boxes Waste	To be submitted	
200-ST-1 Septic Tank and Drain Fields Waste Group	Septic Tanks & Drain Fields Waste		
200-UR-1 Unplanned Release Waste Group	Unplanned Release	To be submitted	
200-SW-2 Radioactive Landfills and Dumps Group	Landfills & Dumps Waste	To be submitted	
200-SW-1 Non-Radioactive Landfills and Dumps Group	Landfills & Dumps Waste		
<i>*Includes 14 other 200 North Waste Sites</i>			

Modifications established by approval of this Tri-Party Agreement Change Request are denoted as ~~redline/strikeout~~ for deletions/modification and shading for new text.

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-013-00M	Submit 2 1 200 NPL RI/FS (RFI/CMS) Work Plans for the 200-IS-1, Tanks/Lines/Pits/Diversion Boxes OU. Includes waste sites in the 200-ST-1, Septic Tank and Drain Fields OU	12/31/2002

Tri-Party Agreement Change Request

M-013-02-01

Page 4

M-013-00N	Submit 3 1 200 NPL RI/FS (RFI/CMS) Work Plans for the 200-UR-1, Unplanned Releases	12/31/2003
M-013-00O	Submit 3 1 200 NPL RI/FS (RFI/CMS) Work Plans for the 200-SW-2, Radioactive Landfills and Dumps OU. Includes waste sites in the 200-SW-1, Non-Radioactive Landfills and Dumps OU	12/31/2004
M-013-00P	Submit 4 200 NPL RI/FS (RFI/CMS) Work Plans	12/31/2005

Change Number	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date																		
M-015-02-01		2/5/2002																		
Originator P. M. Krollmeyer, RL Assistant Manager Central Plateau		Phone 376-7435																		
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																				
Change Title Modify Tri-Party Agreement Milestone Series M-015 in Accordance with the Central Plateau Agreement In Principle																				
Description/Justification of Change <p>The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.</p> <p>USDOE, the U.S. Environmental Protection Agency (EPA), and the State of Washington, Department of Ecology (Ecology) (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and parties will provide the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties have agreed to a strategy for timely waste site remediation of the non-Tank Farm RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau. The parties have set the schedule for submittal of the RCRA TSD Closure/Post Closure Plans (M-020 series milestones). The schedule is coordinated with the FS submittal date and activities (M-015 series milestones). The M-015 and M-020 series milestones, while coordinated, remain independently enforceable.</p> <p>The parties signed an Agreement in Principle (AIP) that calls for the agencies to complete negotiations and sign a Tentative Agreement by January 31, 2002, and commits the parties to complete public comment/review and agency approval no later than June 5, 2002.</p> <p>Continued on Pages 2 through 4</p>																				
Impact of Change Clarifications, consolidation, and deletions of existing TPA milestones/target dates and adds two milestones supporting the 200-PW-2 OU RI/FS and one milestone to submit a Proposed Plan for a remedial action(s) at a high-risk waste site. Maintains same timetable to complete remedial investigation and feasibility studies.																				
Affected Documents The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).																				
Approvals <table border="0" style="width: 100%;"> <tr> <td style="width: 35%; border-bottom: 1px solid black;"></td> <td style="width: 10%; border-bottom: 1px solid black;"></td> <td style="width: 10%; text-align: center;">_____ Approved _____ Disapproved</td> </tr> <tr> <td>W. W. Ballard, DOE IAMIT Representative</td> <td>Date</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">_____ Approved _____ Disapproved</td> </tr> <tr> <td>D. F. Faulk, Acting EPA IAMIT Representative</td> <td>Date</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">_____ Approved _____ Disapproved</td> </tr> <tr> <td>M. A. Wilson, Ecology IAMIT Representative</td> <td>Date</td> <td></td> </tr> </table>					_____ Approved _____ Disapproved	W. W. Ballard, DOE IAMIT Representative	Date				_____ Approved _____ Disapproved	D. F. Faulk, Acting EPA IAMIT Representative	Date				_____ Approved _____ Disapproved	M. A. Wilson, Ecology IAMIT Representative	Date	
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D. F. Faulk, Acting EPA IAMIT Representative	Date																			
		_____ Approved _____ Disapproved																		
M. A. Wilson, Ecology IAMIT Representative	Date																			

Tri-Party Agreement M-015 milestone series identifies the schedules from approved workplans for accomplishing the necessary RI/FS work to complete 200 Area non-Tank Farm past-practice pre-Record of Decision (ROD) waste site investigations by December 31, 2008 (M-15-00C). The *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*, established an approach for investigating the waste sites. Under this plan, approximately 700 waste sites were grouped into 23 process-based operable units (OUs), which in turn were grouped into 9 major waste categories (e.g., process waste, landfills). Each of the 23 OUs were scheduled in the Tri-Party Agreement to have work plans developed under the M-013 milestone series. One OU was included in the *100 Area Remaining Sites Record of Decision*. For the remaining operable units, the three agencies have jointly developed an improved approach to the remedial investigations and subsequent remediation of the waste sites based on lessons learned from Hanford’s 100 and 300 Areas.

The revised investigation approach is to evaluate one or more OUs in a single RI/FS. This reduces the number of work plans, remedial investigation reports, and feasibility studies from 22 to 12. The revised approach is able to collect data necessary to adequately characterize the site and evaluate effective remedial alternatives. Under this approach, all of the RCRA TSDs identified in the M-020 series milestones will be sampled to comply with RCRA Closure/Post Closure requirements. These improvements will be incorporated into a revision of the *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*. Of the 12 RI/FS, 5 have approved work plans and 4 are in the final stages of the approval process. All completed work plans will be revised to reflect OU consolidation.

RI/FS Grouping of OUs	Major Waste Category
200-CW-1 Gable Mountain/B-Pond & Ditch Cooling Water Group*	Steam Condensate, Cooling Water and Chemical Sewer Waste (SC/CW/CSW)
200-TW-1 Scavenged Waste Group	Tanks/Scavenged Waste
200-TW-2 Tank Waste Group	Tanks/Scavenged Waste
200-PW-5 Fission Product-Rich Process Waste Group	Process Condensate and Process Waste (PC&PW)
200-CW-5 U Pond/Z-Ditches Cooling Water Group	SC/CW/CSW
200-CW-2 S-Ponds/Ditches Cooling Water Group	SC/CW/CSW
200-CW-4 T-Ponds/Ditches Cooling Water Group	SC/CW/CSW
200-SC-1 Steam Condensate Group	SC/CW/CSW
200-CS-1 Chemical Sewer Group	SC/CW/CSW
200-PW-2 Uranium-rich Process Waste Group	PC&PW
200-PW-4 General Process Waste Group	PC&PW

The three work submitted to December for the Chemical Group Operable PW-1 Plutonium-Process Waste Group RIF/FS, and the Miscellaneous Operable Unit RI/FS undergoing Each work plan proposed change Tri-Party Agreement Milestones work for these units part of the review process and Central Plateau

P

RI/FS Grouping of OUs	Major Waste Category
200-PW-1 Plutonium/Organic-Rich Process Waste Group	PC&PW
200-PW-3 Organic-rich Process Waste Group	PC&PW
200-PW-6 Plutonium Process Waste Group	PC&PW
200-LW-1 300 Areas Chemical Laboratory Waste Group	Chemical Laboratory Waste (CLW)
200-LW-2 200 Areas Chemical Laboratory Waste Group	CLW
200-MW-1 Miscellaneous Waste Group	Miscellaneous Waste
200-IS-1 Tanks/Lines/Pits/Boxes Waste Group	Tanks/Lines/Pits/Boxes Waste
200-ST-1 Septic Tank and Drain Fields Waste Group	Septic Tanks & Drain Fields Waste
200-UR-1 Unplanned Release Waste Group	Unplanned Release
200-SW-2 Radioactive Landfills and Dumps Group	Landfills & Dumps Waste
200-SW-1 Non-Radioactive Landfills and Dumps Group	Landfills & Dumps Waste
<i>*Includes 14 other 200 North Waste Sites</i>	

plans were Ecology and EPA in 200-LW-1 300 Area Laboratory Waste Unit RI/FS, the 200-Rich/Organic-Rich Condensate/Process Operable Unit 200-MW-1 Waste Group Work Plan, and are regulatory review. contained a request identifying Interim Milestones. governing RI/FS will be finalized as a regulatory work plan not as part of the negotiations.

Modifications/deletions to existing milestones are denoted with ~~redline/strike out~~, new milestones are shaded.

Milestone	Description/Title	Due Date
M-015-00	Complete the RI/FS (or RFI/CMS) Process for all Operable Units	12/31/2008
M-015-00C	Complete all 200 Area Non-Tank Farm Operable Unit Pre-ROD Site Investigations under Approved Work Plan Schedules	12/31/2008
M-015-02E-T3	EPA will issue a final ROD for 200 BP 1 OU.	06/01/1994
M-015-02E-T4	DOE will submit a Definitive Design for the modified RCRA Barrier to EPA/Ecology 2 months after the ROD is issued by no sooner than August 1, 1994	200 BP 1 ROD + 2 Months
M-015-02E-T5	DOE will submit a remedial action plan to EPA/Ecology 4 months after the ROD is issued but no sooner than October 1, 1994.	200 BP 1 ROD + 4 Months

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Milestone	Description/Title	Due Date
M-015-02E-T6	DOE will complete the bid and award cycle for the final barrier 8 months after the ROD is issued but no sooner than February 15, 1995	200-BP-1 ROD ± 8 Months
M-015-02E-T7	DOE will complete remediation activities at 200-BP-1 OU 15 months after the ROD is issued but no sooner than October 14, 1994	200-BP-1 ROD ± 15 Months
M-015-38A	Submit 200-CW-1 Gable Mountain Pond/B Pond and Ditch Cooling Water Group Feasibility Study, including 216-N-1, 216-N-2, 216-N-3, 216-N-4, 216-N-5, 216-N-6, 216-N-7, UPR-200-E-34, 600-118, 200-N-3, 600-254, 2607-N, 2607-R, UPR-200-N-1, and UPR-200-N-2 Past Practice Waste Sites and 216-B-3 Pond System RCRA TSD Unit Closure Plan, and Submit 200-CW-1 Gable Mountain Pond/B Pond and Ditch Cooling Water Group Proposed Plan/Proposed RCRA Permit Modification	03/31/2003
M-015-39B	Submit 200-CS-1 Chemical Sewer Group RI Report	05/31/2004
M-015-39C	Submit 200-CS-1 Chemical Sewer Group FS and 216-A-29 Ditch, 216-B-65 Trench, and 216-S-10 Pond and Ditch RCRA TSD Unit Closure Plan and submit 200-CS-1 Chemical Sewer Group Proposed Plan/Proposed RCRA Permit Modification	11/30/2005
M-015-40A	Complete 200-CW-5 U Pond/Z Ditches Cooling Water Group Field Work	09/30/2002
M-015-40B	Submit 200-CW-5 U Pond/Z Ditches Cooling Water Group RI Report including the Past Practice Waste Sites in the 200-CW-2 S-Ponds/Ditches Cooling Water Group, the 200-CW-4 T-Ponds/Ditches Cooling Water Group, and the 200-SC-1 Steam Condensate Group	05/31/2003
M-015-40C	Submit 200-CW-5 Pond/Z Ditches Cooling Water Group FS and Submit 200-CW-3 U Pond/Z Ditches Cooling Water Group Proposed Plan including the Past Practice Waste Sites in the 200-CW-2 S-Ponds/Ditches Cooling Water Group, the 200-CW-4 T-Ponds/Ditches Cooling Water Group, and the 200-SC-1 Steam Condensate Group	10/31/2004
M-015-41B	Submit 200-TW-1 OU and 200-TW-2 OU RI Report to EPA and Ecology and includes the Past Practice Waste Sites in the 200-PW-5 Fission Product-Rich Process Waste Group.	10/30/2002
M-015-41C	Submit 200-TW-1 OU and 200-TW-2 OU FS and Proposed Plan to EPA and Ecology and includes the Past Practice Waste Sites in the 200-PW-5 Fission Product-Rich Process Waste Group. The waste site associated with the Hanford prototype barrier will be addressed by the TW-1/TW-2 Proposed Plan	03/31/2004
M-015-42B	Submit 200-TW-2 OU Draft A Remedial Investigation Report to Ecology	09/30/2002
M-015-42C	Submit 200-TW-2 OU Draft A Feasibility Study and Draft A Proposed Plan/Proposed Permit Modification to Ecology	03/31/2004
M-015-43B	Submit 200-PW-2 OU RI Report including the Past Practice Waste Sites in the 200-PW-4 General Process Waste Group	06/30/2004
M-015-43C	Submit 200-PW-2 OU Feasibility Study and Proposed Plan/Proposed RCRA Permit Modification including the Past Practice Waste Sites in the 200-PW-4 General Process Waste Group	12/31/2005
M-015-47	Submit a Proposed Plan to EPA and/or Ecology to conduct remedial action(s) for source control at high-risk waste site(s) which includes an engineering evaluation of an engineered surface barrier.	6/30/2003

Change Number M-016-02-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 2/11/2002
Originator P. M. Knollmeyer, Assistant Manager Central Plateau		Phone 376-7435
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modification of the M-016 Series Milestones		
Description/Justification of Change <p>The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.</p> <p>USDOE, the U.S. Environmental Protection Agency, and the State of Washington, Department of Ecology (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and the parties will provide the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties have agreed to a strategy for timely waste site remediation of the non-Tank Farm RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau.</p> <p>The agencies signed an Agreement in Principle (AIP) that requires the parties to sign a Tentative Agreement by January 31, 2002, and commits completion of public comment/review and agency approval no later than June 5, 2002.</p> <p>Continued on Pages 2.</p>		
Impact of Change Modifies the M-016-00 milestone description and extends the M-016-00 completion date to coincide with single-shell tank farm closure (M-045-00).		
Affected Documents The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).		
Approvals _____ K. A. Klein, RL Manager _____ Date _____ Approved _____ Disapproved _____ L. J. Iani, EPA Region 10 Administrator _____ Date _____ Approved _____ Disapproved _____ T. C. Fitzsimmons, Ecology Director _____ Date _____ Approved _____ Disapproved		

Description/Change (Continued)

Past-practice waste site remedial actions in the 200 Area must be closely coordinated with remedial/closure activities conducted in the Tank Farms and on major facilities. The 200 Area non-tank farm operable unit waste site investigations will be completed by December 31, 2008 under the M-015 series milestones and all source RODs are expected to be in place no later than 2010. Additionally, the parties recommend that the M-016-00 major milestone be extended to 2024 to coordinate non-Tank Farm remedial actions with single-shell tank farm closure. Tri-Party Agreement Milestone M-016-00A (Complete all 100 Area Remedial Actions by 12/31/2012 [proposed]) and M-016-00B (Complete all 300 Area Remedial Actions by 09/30/2018 [proposed]) are addressed as part of the River Corridor Tri-Party Agreement Negotiations and can be found in Tri-Party Agreement Change Request M-016-01-05 and M-016-01-06 currently in the public review process. Because all decontamination and decommissioning activities in the 100 Area are covered by proposed milestone M-016-00A, they are being stricken from M-016-00 milestone.

Modifications established by approval of this Tri-Party Agreement Change Request are denoted as ~~redline/strikeout~~ for deletions/modification and ~~shading~~ for new text.

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-016-00	Complete Remedial Actions for all Non-Tank Farm Operable Units. Complete Decontamination and Decommissioning of all 100 Area Buildings and Structures (Except 105 B, 105 C, 105 D, 105 DR, 105 E, 105 H, 105 KE, 105 KW, and 105 N Buildings)	9/30/2018 <u>9/30/2024</u>

Change Number M-020-02-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 2/11/2002
Originator P. M. Knollmeyer, RL Assistant Manager Central Plateau		Phone 376-7435
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modify Tri-Party Agreement Milestone Series M-020 in Accordance with the Central Plateau Agreement In Principle		
Description/Justification of Change The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004. USDOE, the U.S. Environmental Protection Agency (EPA), and the State of Washington, Department of Ecology (Ecology) (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and the parties will provide the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties have agreed to a strategy for timely waste site remediation of the non-Tank Farm RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau. The agencies have set the schedule for submittal of the RCRA TSD Closure/Post Closure Plans (M-020 series milestones). The schedule is coordinated with the FS submittal date and activities (M-015 series milestones). The M-015 and M-020 series milestones, while coordinated, remain independently enforceable. The agencies signed an Agreement in Principle (AIP) that calls for the parties to complete negotiations and sign a Tentative Agreement by January 31, 2002, and commits the parties to complete public comment/review and agency approval no later than June 5, 2002. Continued on pages 2 through 3.		
Impact of Change Extends completion date to coincide with the FS completion dates under M-015 and further defined the M-020 commitments through two additional milestones. Clarifications, consolidation and revisions of existing M-020 interim milestones.		
Affected Documents The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).		
Approvals _____ _____ _____ Approved _____ Disapproved K. A. Klein, RL Manager Date _____ _____ _____ Approved _____ Disapproved L. J. Iani, EPA Region 10 Administrator Date _____ _____ _____ Approved _____ Disapproved T. C. Fitzsimmons, Ecology Director Date		

The 200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0, (Implementation Plan) established an approach for investigating 200 Area non-Tank Farm past-practice waste sites. Under this plan, approximately 700 waste sites were grouped into 23 process-based operable units (OUs), which in turn were grouped into 9 major waste categories (e.g., process waste, landfills). The 16 RCRA TSD Units requiring closure/post closure plans under the M-020 series milestone were included in OUs under this grouping process. All 23 OUs were scheduled in the Tri-Party Agreement to have work plans developed under the M-013 series milestone. All 16 RCRA TSDs were identified in the Implementation Plan as sites requiring investigation. At the current time, closure/post closure plans have been submitted for 7 of the 16 TSD Units.

The 16 RCRA TSD units are:

RCRA TSD	Existing M-020 Milestone Number	Submittal Status	Associated OU
600 NRDWL	M-20-07	Submitted 1/31/90	200-SW-2
216-B-3 Pond System	M-20-09	Submitted 3/31/90	200-CW-1
276-S-141 Storage Tank	M-20-27	Submitted 11/25/92	200-IS-1
276-S-142 Storage Tank	M-20-27	Submitted 11/25/92	200-IS-1
216-A-10 Crib	M-20-33	Not submitted	200-PW-2
216-A-36B Crib	M-20-33	Not submitted	200-PW-2
216-A-29 Ditch	M-20-36	Submitted 6/30/95	200-CS-1
216-U-12 Crib	M-20-37	Submitted 6/27/95	200-PW-2
216-A-37-1	M-20-52	Not submitted	200-PW-4
207-A South Ret. Basin	M-20-53	Not submitted	200-PW-4
216-B-63 Trench	M-20-36	Submitted 4/3/95	200-CS-1
216-S-10 Pond	M-20-39	Not submitted	200-CS-1
216-S-10 Ditch	M-20-39	Not submitted	200-CS-1
241-CX-70 Storage Tank	M-20-54	Not submitted	200-IS-1
241-CX-71 Neut. Tank	M-20-54	Not submitted	200-IS-1
241-CX-72 Storage Tank	M-20-54	Not submitted	200-IS-1

Subsequent to the approval of the Implementation Plan, one OU was included in the 100 Area Remaining Sites Record of Decision. For the remaining operable units, the three agencies have adopted an improved approach to the remedial investigations and subsequent remediation of the waste sites based on lessons learned from Hanford's 100 and 300 Areas.

The revised investigation approach is to evaluate one or more OUs in a single RI/FS. This reduces the number of work plans, remedial investigation reports, and feasibility studies from 22 to 12. The revised approach is able to collect data necessary to adequately characterize the site and evaluate effective remedial alternatives. Under this approach, all of the RCRA TSDs identified in the M-020 series milestones will be sampled to comply with RCRA Closure/Post Closure requirements. These improvements will be incorporated into a revision of the 200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0. Of the 12 RI/FS, 5 have approved work plans and 4 are in the final stages of the approval process. All completed work plans will be revised to reflect OU consolidation.

The Implementation Plan established a framework for integrating the RCRA TSD closure process with the OU RI/FS process. The remaining Closure/Post Closure plans will be submitted in conjunction with the associated operable unit Feasibility Study. The parties have proposed a change to the Tri-Party Agreement M-020-00 completion date to December 31, 2008 so that it will be

coordinated with the completion of the OU RI/FS process Tri-Party Agreement Milestone M-015-00C. The M-020 interim milestones are modified to coordinate with the M-015 interim milestones or with the remaining M-013 series milestones for OU work plans that have not yet been developed. The M-020 series milestones are independently enforceable. Milestone M-020-00B establishes the submittal date for closure/post closure plans for the following RCRA TSDs: 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72. Milestone M-020-00A was created to retain the February 28, 2004, deadline for submittal of Part B Permit Applications or Closure/Post Closure Plans for all RCRA TSD Units, except the units listed in M-020-00B.

Modifications/deletions to existing milestones are denoted with ~~redline/strike out~~, new milestones and changes are shaded.

M-20-00	Submit Part B Permit Applications or Closure/Post Closure Plans for All RCRA TSD Units	2/28/2004 12/31/2008
M-020-00A	Submit Part B Permit Applications or Closure/Post Closure Plans for all RCRA TSD Units except 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72.	02/28/2004
M-020-00B	Submit Closure/Post-Closure Plans for 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72.	12/31/2008
M-20-33	Submit 216-A-10 Crib, 216-A-36B Crib, 216-A-37-1 Crib, and 207-A South Retention Basin Closure/Post Closure Plans to Ecology in coordination with the Work Plan for Uranium Rich Process Waste Group (to be coordinated with M-13-23) Feasibility Study for the 200-PW-2 Uranium-Rich Process Waste Group Operable Unit (to be coordinated under M-15-43C)	10/31/2003 12/31/2005
M-20-39	Submit 216-S-10 Pond and Ditch Closure/Postclosure Plan to Ecology In coordination with the Work Plans for the Chemical Sewer Group (To be Coordinated with M-13-21) Feasibility Study for the 200-CS-1 Chemical Sewer Group Operable Unit (to be coordinated under M-15-39C)	2/28/2003 11/30/2005
M-20-52	Submit 216-A-37-1 Crib Closure/Postclosure Plan to Ecology in Coordination with the Work Plan for the General Process Waste Group (to be coordinated with M-13-24)	12/31/2003
M-20-53	Submit 207-A Retention Basin Closure/Postclosure Plan to Ecology in Coordination with the Work Plan for the General Process Waste Group (to be coordinated with M-13-24)	12/31/2003
M-20-54	Submit 241-CX-70 Storage Tank, 241-CX-71 Neutralization Tank, 241-CX-72 Storage Tank Tank System Closure/Post Closure Plan to Ecology in coordination with the Work Plans for the Infrastructure Waste Group (To be coordinated with M-13-00K) the 200-IS-1 Tanks/Lines/Pits/Boxes Operable Unit Work Plan Feasibility Study scheduled under M-13-00M	2/28/2004 12/31/2008

