



Department of Energy

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

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FEB 27 1992

92-WOB-063

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. David B. Jansen, P. E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
P. O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE CHANGE REQUEST

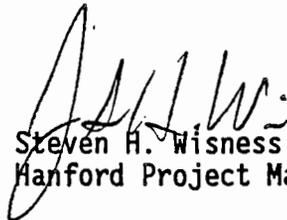
The Hanford Patrol Academy Demolition Site (HPADS) has been used in the past to detonate potentially shock sensitive/explosive chemicals. Because of efforts to cleanout these types of chemicals from generating units, the need for a operating unit to detonate potentially shock sensitive/explosive chemicals is no longer necessary. Therefore, the U. S. Department of Energy, Richland Field Office (RL) has decided to close the HPADS. In doing so, the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-25, which calls for the completion of a Part B permit application, is no longer appropriate. However, a closure plan is required because of the decision to close the HPADS. A Tri-Party Agreement Change Control Form reflecting this change from a permit to a closure plan is enclosed.

Although an operating unit for the routine detonation of chemicals is no longer determined to be necessary, an emergency demolition location may be appropriate for unexpected events. It would be appropriate to develop an agreement that identifies the proper protocol for the use or development of such an emergency demolition location. This agreement should define notification and reporting requirements and should also clarify when an 'emergency detonation' might be necessary. This agreement could follow the same approach as currently arranged between the U.S. Environmental Protection Agency and the Bureau of Alcohol, Tobacco, and Firearms regarding the disposition of potentially shock sensitive/explosive chemicals. A meeting will be arranged with members of your staff to address this issue in the near future.

The original change request is being forwarded to Ecology. It is requested that the original change request be forwarded to EPA as soon as Ecology has dispositioned it. EPA should then return the original change request to RL.

If you have any questions regarding this change request, please call me on (509) 376-6798.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

Enclosure:  
Tri-Party Agreement Change  
Control Form

cc w/encl:

~~R. E. Lerch, WHC~~  
H. E. McGuire, WHC  
T. B. Veneziano, WHC  
M. M. McCarthy, WHC  
R. D. Pierce, WHC

Change Number M-20-92-2	<b>FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM</b> <small>Do not use blue ink. Type, or print using black ink.</small>	Date Feb. 14, 1992
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Originator B. M. Barnes	Phone (509) 376-3640
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Class of Change <input type="checkbox"/> I - Signatories (Section 13.0) <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title Hanford Patrol Academy Demolition Site Closure
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Description/Justification of Change  Reword the Tri-Party Agreement Milestone M-20-25 (completion of a Part B permit application) to read, "Submit Hanford Patrol Academy Demolition Site Closure Plan to Ecology and the EPA," November 30, 1992.  The DOE Richland Field Office has decided to close the Hanford Patrol Academy Demolition Site (HPADS). In doing so, the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-25, which calls for the completion of a Part B permit application, is no longer appropriate. However, a closure plan is required because of the decision to close the HPADS.
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Impact of Change  No significant impact.  Although permitting a unit like the HPADS is not required, 'emergency' sites at Hanford will be necessary for unexpected events. It will be necessary to negotiate an agreement that identifies the proper methods for the use of emergency demolition locations on the Hanford Facility. This agreement should define notification and reporting requirements and should also clarify when an 'emergency detonation' might be necessary.
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Affected Documents  Hanford Federal Facility Agreement and Consent Order Action Plan-Appendix D, Table D-3 (page D-17) and Figure D-1 (page 18 of 25).
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<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%; padding: 5px;">Approvals</td> <td style="width:35%; padding: 5px;">Approved</td> <td style="width:35%; padding: 5px;">Disapproved</td> </tr> <tr> <td style="padding: 5px;">DOE </td> <td style="padding: 5px;">_____</td> <td style="padding: 5px;">_____</td> </tr> <tr> <td style="padding: 5px;"></td> <td style="padding: 5px;"></td> <td style="padding: 5px; text-align: center;">2/26/92</td> </tr> <tr> <td style="padding: 5px;"></td> <td style="padding: 5px;"></td> <td style="padding: 5px; text-align: center;">Date</td> </tr> <tr> <td style="padding: 5px;">EPA</td> <td style="padding: 5px;">_____</td> <td style="padding: 5px;">_____</td> </tr> <tr> <td style="padding: 5px;"></td> <td style="padding: 5px;"></td> <td style="padding: 5px; text-align: center;">Date</td> </tr> <tr> <td style="padding: 5px;">Ecology</td> <td style="padding: 5px;">_____</td> <td style="padding: 5px;">_____</td> </tr> <tr> <td style="padding: 5px;"></td> <td style="padding: 5px;"></td> <td style="padding: 5px; text-align: center;">Date</td> </tr> </table>	Approvals	Approved	Disapproved	DOE	_____	_____			2/26/92			Date	EPA	_____	_____			Date	Ecology	_____	_____			Date	Note: Hanford Patrol Academy Demolition Site Closure start dates to be determined in Closure Plan.
Approvals	Approved	Disapproved																							
DOE	_____	_____																							
		2/26/92																							
		Date																							
EPA	_____	_____																							
		Date																							
Ecology	_____	_____																							
		Date																							

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author:	Addressee	Correspondence No.
B. M. Barnes, 6-3640	P. T. Day, EPA D. B. Jansen, Ecology	Incoming: 9201965 Ref.#9250394D
Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE CHANGE REQUEST		

## INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
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		G. D. Carpenter	B2-16	
		L. P. Diediker	T1-30	
		C. K. DiSibio	B3-03	
		R. H. Engelmann	H4-57	
		B. G. Erlandson	B2-19	
		G. D. Forehand	B2-35	
		L. A. Garner	T5-54	
		C. J. Geier	B2-19	
		M. Haas	T5-50	
		R. J. Landon	B2-19	
		R. E. Lerch, Assignee	B2-35	
		P. J. Mackey	B3-15	
		E. J. Manthos	T5-57	
		H. E. McGuire, Level 1	B3-63	
		D. A. Moore	H4-57	
		S. M. Price	H4-57	
		F. A. Ruck III	H4-57	
		T. B. Veneziano	B2-35	
		E. C. Vogt	T5-50	
		EDMC	H4-22	X
		BMB:RCB File/LB	H4-57	X

