



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 Swift Boulevard, Suite 5
Richland, Washington 99352

0064070

March 17, 2005

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EDMC

Keith Klein, Manager
Richland Operations Office
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Subject: EPA Approval of Milestone Change Package M-16-04-09 for the River
Corridor Baseline Risk Assessment

Dear Mr. Klein:

Enclosed for your signature is the subject milestone change package. On August 25, 2004 the U.S. Environmental Protection Agency provided comments on draft A of the Risk Assessment Work Plan for the 100 and 300 Area Component of the River Corridor Baseline Risk Assessment document (DOE/RL-2004-37). One of those comments was that, in accord with the TPA, work plans are to be submitted with a milestone change package, and that no such milestone change package was submitted with the work plan. During the subsequent months, DOE worked with EPA and the Washington State Department of Ecology to define appropriate and acceptable milestones. Collectively we agreed to the milestones that were drafted by DOE into the subject milestone change package. The second enclosure to this letter provides email messages from DOE staff to EPA and Ecology showing the progression of this change package through the DOE approval process. During February DOE approved this change package. After its approval, DOE decided to not provide it EPA and Ecology for our approval because of lack of funding.

EPA is providing a signed change package to DOE. In accord with section 12.3.3, the EPA requests DOE signature approval within 14 days of receipt of this letter. If you have any questions, please contact me at 509-376-9529 or Larry Gadbois of my staff at 509-376-9884.

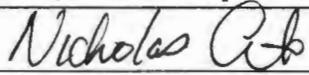
Sincerely,

Nick Ceto, Program Manager
Hanford Project Office

Enclosures:

- 1) Milestone Change Package M-16-04-09 signed by EPA.
- 2) Copies of email messages providing status of the change package within DOE.

Cc: John Price, Ecology
Mike Wilson, Ecology
Administrative Record: 100 and 300 Area

Change Number	Federal Facility Agreement and Consent Order Change Control Form		Date:	
M-16-04-09			March 17, 2005	
Originator: J. P. Sands, RL River Corridor Project D. E. Jackson, RL Office of Environmental Services		Phone: 509-373-0463 509-376-8086		
Class of Change:				
<input type="checkbox"/> I - Signatories		<input checked="" type="checkbox"/> II - Executive Manager		<input type="checkbox"/> III - Project Manager
Change Title:				
Establish Tri-Party Agreement Interim Milestones for Sampling to Support 100/300 Area Component of River Corridor Baseline Risk Assessment.				
Description/Justification of Change:				
In November 2004, the U.S. Department of Energy, Richland Operations Office, (RL) submitted the Risk Assessment Work Plan for the 100 Area and 300 Area Component of the River Corridor Baseline Risk Assessment for approval to the State of Washington, Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA). The risk assessment will serve as a basis for final remedy decisions for the operable units in the 100 and 300 Areas. There are currently no milestones established for this activity. Submittal of a draft risk assessment report assumes that only one year of sampling is needed and builds upon ongoing experience with the 100 B/C Pilot Project. Sampling begins after approval of the Sampling and Analysis Plan scheduled for approval by 9/20/05.				
Modifications/deletions of existing milestones are denoted using redline/strikeout ; additions are denoted with <u>shading</u>				
Milestone Number	Milestone Description			Completion Date
M-016-70	Begin Sampling to Support the 100 Area and 300 Area Component of the River Corridor Baseline Risk Assessment.			10/30/2005
M-016-72	Submit Draft 100 Area and 300 Area Component Baseline Risk Assessment Report			6/30/2007
Impact of Change:				
Administrative action is required to incorporate this change into Appendix D of the Tri-Party Agreement. Change is added scope that is not covered by milestones and does not impact current TPA milestones.				
Affected Documents:				
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).				
Approvals:				
_____	_____	_____	_____	_____
C. E. Clark, RL IAMIT Representative	Date	Approved	Disapproved	
	3/17/05	<i>nc</i> Approved	Disapproved	
N. Ceto, EPA IAMIT Representative	Date	Approved	Disapproved	
_____	_____	_____	_____	_____
M. A. Wilson, Ecology IAMIT Representative	Date	Approved	Disapproved	



"Sands, John P"
<John_P_Sands@rl.gov>
12/17/2004 10:01 AM

To Larry Gadbois/R10/USEPA/US@EPA, "Price, John (ECY)"
<jpri461@ecy.wa.gov>
cc "Morse, John G" <John_G_Morse@rl.gov>, "Sands, John P"
<John_P_Sands@rl.gov>
bcc

Subject TPA change package

Here are the current drafts of the 2 TPA change packages that will be routed through concurrence after your review. Let me know if you have any comments.

<<M-16-04-10 risk assess CR1.doc>> <<M-16-04-093.doc>>

John



M-16-04-10 risk assess CR1.doc M-16-04-093.doc



"Sands, John P"
<John_P_Sands@rl.gov>
02/09/2005 07:44 AM

To Larry Gadbois/R10/USEPA/US@EPA
cc "Price, John (ECY)" <jpri461@ecy.wa.gov>
bcc
Subject RE: Milestones

The package is in concurrence. I have a meeting with the AMS tomorrow to discuss.

John

-----Original Message-----

From: Gadbois.Larry@epamail.epa.gov
[mailto:Gadbois.Larry@epamail.epa.gov]
Sent: Tuesday, February 08, 2005 12:53 PM
To: Sands, John P
Cc: Price, John (ECY)
Subject: Milestones

John:

What ever happened to the milestone change package for the two milestones to (1) begin sampling, and (2) produce a 100/300 Area report?

--Larry--



"Sands, John P"
<John_P_Sands@rl.gov>
02/24/2005 08:03 AM

To "Teel, Darci D" <DDTeel@mail.bhi-erc.com>, "Weiss,
Stephen G" <SgWeiss@mail.bhi-erc.com>, "Price, John
(ECY)" <jpri461@ecy.wa.gov>, Larry
Gadbois/R10/USEPA/US@EPA

cc

bcc

Subject milestone package signed out

I just got notice that the package for the 100/300 Area risk assessment milestones has been signed out.

John



"Sands, John P"
<John_P_Sands@rl.gov>
03/11/2005 11:24 AM

To Larry Gadbois/R10/USEPA/US@EPA, "Price, John (ECY)"
<jpri461@ecy.wa.gov>

cc "Bazzell, Kevin D" <Kevin_D_Bazzell@rl.gov>, "Sands, John
P" <John_P_Sands@rl.gov>

bcc

Subject 100/300 milestone

DOE will be canceling the letter requesting signature of this milestone package. I need to write a letter on this but wanted to give you a heads up.

One of the criteria for not going to HQ for approval of a new milestone is funding availability. You may or may not know that a portion of the risk assessment will not be the responsibility of the new River Corridor contractor per the request for proposal. Collecting data for evaluating impacts from groundwater (which would include the riparian and near shore) is not included in the request for proposal. In discussions with the Central Plateau, they have changed their position on available funding in FY06 for their portion of the milestone.

Both AMCP and AMRC now agree that AMRC should be responsible for the entire scope of the 100/300 risk assessment. This issue cannot be resolved however until during or after transition to the new contractor. In the mean time BHI will continue to go 100% with their work scope.

John