

Change Number  
M-20-94-08

**START**

Federal Facility Agreement and Consent Order  
Change Control Form

Do not use blue ink. Type or print using black ink.

Date  
12/30/94

Originator H. T. TILDEN

Phone 376-0499

Class of Change

I - Signatories  II - Project Manager  III - Unit Manager

Change Title DELETE INTERIM MILESTONE M-20-42 AND REPLACE WITH INTERIM MILESTONE M-20-42A.

Description/Justification of Change

Delete the following Tri-Party Agreement Milestones:

M-20-42 Submit Thermal Treatment Part B to Ecology and EPA (T-X-3) December 1994

Replace interim milestone M-20-42 with the following:

M-20-42A Submit Thermal Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-3) September 1995

This closure plan will cover portion(s) of the Thermal Treatment Test Facilities within the current scope of that unit's Part A Permit Application, Form 3.

Change the planned action in Appendix B of the Hanford Federal Facility Agreement and Consent Order Action Plan from Treatment Operating Permit to Closure for the Thermal Treatment Test Facilities.

Continued on page 2 of 2.

Impact of Change

This change will eliminate the submittal of the Part B Permit Application for these facilities and requires the submittal of a closure plan for the portion(s) of the facilities which have managed dangerous waste.

Affected Documents

- Hanford Federal Facility Agreement and Consent Order, Appendix B and D.
- Part B Permit Application for the Thermal Treatment Test Facilities.
- SEPA Documentation for the Thermal Treatment Test Facilities.
- Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities.

Approvals

*FOR STEVE WISNESS*

Kevin L. Murphy 12/30/94  Approved  Disapproved  
DOE Date

Kevin O'Leary 12/30/94  Approved  Disapproved  
EPA Date

Robert Hawley 12/30/94  Approved  Disapproved  
Ecology Date



Change Request  
M-20-94-08  
December 30, 1994  
Page 2 of 2

Description/Justification continued.

**Justification of Change**

With the submittal of the Thermal Treatment Test Facilities Part A Permit Application, Form 3 in 1988, thermal treatment activities were projected to occur at the 324 Building Engineering Development Laboratory (EDL), the EDL high bay, the hot-cell of the 324 Building, as well as at the 600 Area ISV test site-(located just west of the 300 Area) the 116-B-6-1 crib and other selected laboratories in the 324, 325, and 331 buildings. In a subsequent RD&D Permitting Strategy Study conducted by RL, PNL, and Westinghouse Hanford Company (WHC), no thermal treatment technologies or activities were identified that need RCRA permitting at this time, and no future need to obtain a "generic" permit for demonstrating these thermal treatment technologies was identified.

Samples utilized at these facilities for purposes of treatability studies are only subject to the requirements of WAC 173-303-050, WAC 173-303-145, and WAC 173-303-960 if the conditions of WAC 173-303-071(s)(i) through (xiii) are complied with. Samples utilized for characterization purposes are not subject to the requirements of WAC 173-303 as long as the conditions of WAC 173-303-071(3)(1)(i) through WAC 173-303-071(3)(1)(iii) are complied with.

Waste management activities in these facilities have included accumulation of hazardous waste in accordance with the generator requirements of WAC 173-303-200. Some treatment and storage activities have taken place in portions of the facilities listed in the current Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities. However, the treatment activities were not thermal in nature and permitted storage is not an activity listed on the Part A Permit Application, Form 3 for Thermal Treatment Test Facilities. These activities are not within the scope of the Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities. However, some permitted waste management activities occurred in Thermal Treatment Test Facilities covered within the scope of current Thermal Treatment Test Facilities Part A Permit Application, Form 3. A closure plan will be prepared for these portions of the facilities by September 1995.

**DON'T SAY IT --- Write It!**

DATE: January 10, 1995

TO: J. H. Anderson B3-62  
 L. D. Arnold B2-35  
 R. C. Bowman H6-24  
 C. E. Clark A5-15  
 B. J. Day P7-79  
 D. M. Eder B3-62  
 W. C. Floberg G1-76  
 M. N. Jaraysi B5-18  
 D. L. Lenseigne S7-23  
 P. J. Mackey B3-15  
 D. L. Murphy A5-15  
 H. A. Myers B3-75  
 K. J. Oates B5-01  
 S. M. Price H6-23  
 R. P. Prosser H6-07  
 M. W. Rosenberry S7-57  
 D. R. Sherwood B5-01  
 H. T. Tilden P7-79  
 M. C. Vargas K8-50  
 J. L. Waite B2-35  
 A. J. Watts B3-75  
 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-20-94-08

Attached for your information is an unofficial copy of approved Hanford Federal Facility Agreement and Consent Order change request "Delete Interim Milestone M-20-42 and Replace with Interim Milestone M-20-42A.

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

ceg

Attachment