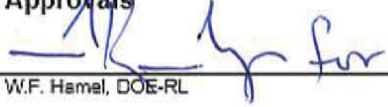




<b>Change Number</b> P-06-19-01	<b>Federal Facility Agreement and Consent Order</b> <b>Change Control Form</b>		<b>Date</b> 06/20/2019
<b>Originator</b> Mostafa Kamal			<b>Phone</b> 376-0289
<b>Class of Change</b> <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
<b>Change Title</b> Modify Tri-Party Agreement (TPA), Action Plan, Section 6.1, Treatment, Storage, and Disposal Unit Process, Introduction			
<b>Description/Justification of Change</b> This change control form modifies the TPA Action Plan, Section 6.1, Treatment, Storage, and Disposal Unit Process, Introduction, to change RCRA Facility Investigation/Corrective Measures (RFI/CM) documents to past-practice documents pursuant to TPA Action Plan, Section 5.5 Treatment, Storage, and Disposal Units and Past-Practice Units Interface, and adds the requirement of RCRA and the State of Washington Hazardous Waste Management Act, Chapter 70.105 RCW, and pertains to all units that were used to store, treat, or dispose of mixed waste after August 19, 1987.  This change control form was coordinated with the following change control forms in the Coordinated Closure negotiations: <ul style="list-style-type: none"> <li>• P-03-19-01, Modify TPA, Action Plan, Section 3.3, Past-Practice Units, to Reflect RCRA Closures as Part of CERCLA Actions,</li> <li>• P-05-19-01, Modify TPA, Action Plan, Section 5.5, Treatment, Storage, and Disposal Units and Past-Practice Units Interface, to Reflect RCRA Closures as Part of CERCLA Actions,</li> <li>• P-07-19-01, Modify TPA, Action Plan, Section 7.4.2, Resource Conservation and Recovery Act Facility Investigation and Remedial Investigation, and</li> <li>• M-37-19-01, Modification of M-037 Series Milestones in TPA Appendix D.</li> </ul>			
<b>Impact of Change</b> No work schedules or milestones are impacted by this change.			
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), as amended.			
<b>Approvals</b>			Page 1 of 3
 W.F. Hamel, DOE-RL	for 03/19/2020 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
 R.G. Hastings, DOE-ORP	3/18/20 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
 A.K. Smith, Ecology	3/20/2020 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
<b>DAVID EINAN</b> Digitally signed by DAVID EINAN Date: 2020.04.14 15:21:56 -07'00'	Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
D.R. Einan, EPA	Date	Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	

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## Authorized Changes

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

## 6.0 Treatment, Storage, and Disposal Units

### 6.1 Introduction

This section discusses the requirements of RCRA and the State of Washington Hazardous Waste Management Act, Chapter 70.105 RCW, and pertains to all units that were used to store, treat, or dispose of (1) RCRA hazardous waste and hazardous constituents after November 19, 1980; (2) State-only hazardous waste after March 12, 1982; or (3) mixed waste after August 19, 1987; and units at which such wastes will be stored, treated, or disposed in the future, except as provided by 173-303-200 WAC.

A list of these units, or grouping of units, is provided in Appendix B. Section 3.0 identifies the criteria by which these units will be scheduled for permitting and closure actions.

Some of the TSD groups/units (primarily land disposal units) have been included in operable units, as discussed in Section 3.3.<sup>2</sup> The information necessary for performing RCRA closures within an operable unit will be provided in coordination with various past-practice RFI/CMS or RI/FS documents. These documents will include a coordinated past-practice site investigation/RCRA closure/RCRA corrective action approach in order to implement applicable regulations ~~as discussed in pursuant to~~ Section 5.5.

Some of the TSD groups/units (primarily those located within large processing facilities) will be integrated with the disposition of the facility, and therefore closed in accordance with the process defined in Section 8.0. These units are those that have physical closure actions that need to be done in conjunction with the physical disposition actions in the facility (e. g. removal of structural components). Even though TSD units are closed in accordance with Section 8.0, applicable requirements defined in this section still apply (e.g. 6.5 Quality Assurance).

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<sup>2</sup> These TSD units have been assigned to appropriate operable units for the sole purpose of coordinating the development and implementation of closure plans for such TSD units with the investigation and remediation of closely associated past-practice units, in accordance with the process described in Action Plan Section 5.5. These assignments are purely administrative in nature and do not in and of themselves subject any TSD unit to the CERCLA decision-making process.

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Currently identified actions necessary to bring TSD units into compliance with Federal and State laws are identified in the work schedule (see Appendix D) including necessary interim milestones. These interim milestones are consistent with the major milestones for achieving interim status compliance requirements specified in Section 2.4. A schedule for completing interim status compliance actions is provided as part of Appendix D.

The RCRA land disposal restrictions (LDR) require that established treatment requirements be met prior to land disposal of hazardous wastes. While treatment capacity generally exists for the nonradioactive hazardous wastes which are subject to LDR, treatment is currently not available for some of the mixed wastes subject to LDR which require storage at the Hanford Site.

Ecology has received authorization from EPA to implement ~~certain~~ LDR provisions of RCRA pursuant to Section 3006 of RCRA. Accordingly, these authorized state provisions are effective in lieu of the Federal requirements. ~~Both EPA and Ecology anticipate that Ecology will receive authorization for the additional LDR provisions in the future. EPA and Ecology intend to use the LDR provisions under M-26 and other HSWA provisions which have comparable state analogs that have not yet been authorized as an example of regulatory streamlining at the Hanford Site, by designating Ecology as the lead regulatory agency for those provisions under applicable state law.~~ This includes review and approval of LDR annual reports, plans, and schedules for compliance with M-26-00. ~~While EPA must retain legal authority over portions of the LDR which are not yet authorized to the state, EPA will not assign staff to oversee the routine completion of activities related to M-26-00.~~ In the event that EPA involvement in a specific matter is requested by Ecology or is otherwise necessary, Ecology staff will brief EPA and EPA will become involved to the extent necessary to help resolve that specific matter. EPA and Ecology intend that such involvement on the part of EPA will be the exception, rather than the rule.

In accordance with Milestone M-26-00, DOE has submitted the "Hanford Land Disposal Restrictions Plan for Mixed Wastes," (LDR Plan) to Ecology, as the lead regulatory agency. This plan describes a process for managing mixed wastes subject to LDR at the Hanford Site and identifies actions which will be taken by DOE to achieve full compliance with LDR requirements.

These actions will be taken in accordance with approved schedules specified in the LDR Plan and in the Work Schedule (Appendix D). The DOE will submit annual reports which shall update the LDR Plan and the prior annual report, including plans and schedules. The annual report will also describe activities taken to achieve compliance and describe the activities to be taken in the next year toward achieving full compliance. The LDR Plan and annual reports are primary documents, subject to review and approval by Ecology. Ecology also has approval authority for schedules in the LDR Plan and annual reports. Changes to approved final schedules must be made in accordance with the Change Control System described in Section 12.0.