



BIART

Department of Energy

Richland Operations Office
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Richland, Washington 99352

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Incoming 9404819

JUL 06 1994

BPP0-94-034

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Roger F. Stanley
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Stanley:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-20-94-04, "MODIFY B PLANT PART B PERMIT APPLICATION INTERIM MILESTONE M-20-21A"

The subject Class II Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form is enclosed for your review and approval. This Change Control Form was prepared to change the interim milestone date for submittal of a Part B permit application for B Plant in fulfillment of Tri-Party Agreement and Consent Order Interim Milestone M-20-21A.

Interim Milestone M-20-21A presently requires that a Part B Dangerous Waste Permit Application for B Plant be submitted by September 1995. Until a decision is made regarding future operating plans, or a formal decision is received to terminate operations and shut down B Plant, the preparation and submittal of a Part B Permit Application as presently outlined in Milestone M-20-21A is not considered practical.

The Change Control Form proposes that the existing milestone be changed to place the requirement for a Part B Permit Application for B Plant on indefinite hold. When the future mission for B Plant has been determined, the permitting requirements will be assessed and a Part B Permit Application or a shutdown strategy will be developed and submitted to support implementation of that mission.



Messrs. Sherwood and Stanley

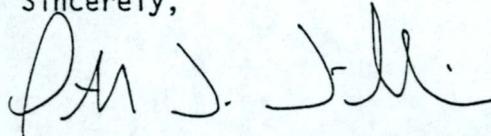
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The original copy of the Change Request is being delivered via this letter to the State of Washington Department of Ecology (Ecology) for disposition. Upon disposition, Ecology is requested to forward the original to the U.S. Environmental Protection Agency.

Should you or your staff have any questions regarding the enclosed Change Control Form please contact L. D. Romine, (509) 376-4747.

Sincerely,



Patrick W. Willison
Acting Hanford Project Manager

NMD:LDR

Enclosure:

cc: D. M. Bogen, WHC
R. C. Bowman, WHC
D. L. Halgren, WHC

9413290-2146

Change Number M-20-94-04	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date June 14, 1994
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Originator A. P. Walton	Phone (509) 376-8458
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Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title Modify B Plant Part B Permit Application Interim Milestone M-20-21A.
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Description/Justification of Change - Interim Milestone M-20-21A requires that a Part B permit application be submitted for B Plant by September 1995. This interim milestone reflected the use of B Plant as a TSD unit for future operation in support of the cleanup mission at Hanford. There is much uncertainty surrounding plans for the future use of B Plant. A formal decision to terminate operations and shut down B Plant may be forth coming.

The current operation of B Plant is primarily for the support of the adjacent Waste Encapsulation Storage Facility (WESF) and to manage the radiological inventory currently (e.g. HEPA filters and radiologically contaminated lead) stored at B Plant. This Class II Change places the existing interim milestone "Submit B Plant Part B permit application to Ecology and EPA" on hold until future uses for B Plant can be determined. In addition to the current uncertain future for B Plant, B Plant can not economically meet the technical requirements for recommended containment which precludes the original intent for preparation of a part B Permit Application. Therefore, it appears this is the prudent course of action. If a decision to terminate operations at B Plant is received, then a facility transition schedule would be negotiated in accordance with section 3.1 of the Federal Facility Agreement and Consent Order to include any associated closure actions.

Number M-20-21A	Milestone Submit B Plant Part B Permit Application to Ecology and EPA.	Due Date TBD
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Impact of change- This change does not impact other Hanford Federal Facility Agreement and Consent Order Milestones.

Affected Documents- Hanford Federal Facility Agreement and Consent Order, Appendix D, Table D - Major and Interim Milestones and Action Plan Work Schedule.

Approvals		
DOE <u>P. W. Willison</u>	<u>7/7/94</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA <u>D. R. Sherwood</u>	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology <u>R. F. Stanley</u>	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

7/17-0622/16

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
P. W. Willison, RL (A. P. Walton, WHC)	D. R. Sherwood, EPA R. F. Stanley, Ecology	Incoming 9404819 Xref 9453918D
Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-20-94-04, "MODIFY B PLANT PART B PERMIT APPLICATION INTERIM MILESTONE M-20-21A"		

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
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		L. D. Arnold	B2-35	
		B. A. Austin	B2-30	X
		J. E. Beiler	S6-70	X
		W. W. Bowen	S6-65	X
		R. C. Bowman	H6-24	
		D. J. Carrell	H6-22	X
		M. W. Cline	H6-24	
		W. T. Dixon, Assignee	H6-21	
		D. L. Halgren	S6-70	X
		R. J. Julian	S6-65	X
		P. J. Mackey	B3-15	X
		H. E. McGuire, Sr. Staff	B3-63	
		R. D. Morrison	B2-35	X
		K. A. Peterson	H6-30	X
		S. M. Price	H6-23	X
		J. L. Waite	B2-35	
		A. P. Walton	H6-24	X
		EPIC	H6-08	X
		RCRA File/GHL	H6-23	X
		APW File/LB	H6-24	X

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