



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

04-OES-0008

MAR 16 2004

Ms. Linda Hoffman, Interim Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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APR 14 2004

EDMC

Mr. L. John Iani, Regional Administrator
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Addressees:

**SUBMITTAL OF SIGNED HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE FORM M-20-04-01 FOR
MODIFICATION OF MILESTONES M-20-00, M-20-00A AND M-20-00B AND PROVIDE
NOTIFICATION OF COMPLETION OF MILESTONE M-20-00A**

Tri-Party Agreement Major Milestone M-20-00A, requiring the submittal of a draft Resource Conservation and Recovery Act (RCRA) Permit Application or Closure Plan for all Hanford Site Treatment, Storage and Disposal facilities, was due on February 28, 2004. The U.S. Department of Energy, Richland Operations Office (RL) has reviewed the scope of this milestone and related agreements and has found that Major Milestone M-20-00A was completed when the final supporting interim milestone was met on July 25, 2003. Any RCRA Permit Applications or Closure Plans which have not yet been submitted are now the subject of other milestones or agreements, as discussed in the attached change form. This change form adjusts Major Milestones M-20-00, M-20-00A, M-20-00B and Interim Milestone M-16-52 to be consistent with agreements already in place between RL, the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA).

RL, Ecology and EPA have determined that these changes do not meet the significance criteria of the Agreement Community Relations Plan and therefore, a public comment period is not required prior to approval.

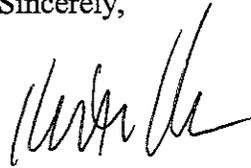
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The original of this change form is being provided to Ecology for approval. Upon Ecology's approval, it is requested that the original form be forwarded to the EPA offices for final approval and subsequent return to this office. If you have any questions, you may contact me, or your staff may contact Joel Hebdon, Director, Office of Environmental Services, on (509) 376-6657.

Sincerely,



Keith A. Klein
Manager

OES:DEJ

Attachment

cc w/attach:

D. Bartus, EPA
N. Ceto, EPA
L. D. Crass, FHI
L. J. Cusack, Ecology
L. E. Gadbois, EPA
M. L. Goldstein, EPA
S. Harris, CTUIR
J.S. Hertzell, FHI
R. Jim, YN
J. J. Luke, CHG
T. Martin, HAB
E. Murphy-Fitch, FHI
K. Niles, ODOE
J. Price, Ecology
E. Skinnarland, Ecology
P. Sobotta, NPT
R.F. Stanley, Ecology (Lacey)
M. A. Wilson, Ecology (Olympia)
Administrative Record

| | | | | | | | | | | | | | | | | | | |
|--|--|--|---|---------|--|--------------------------------------|-----|------|-----------------------------------|--------------------------------------|-----|------|-----------------------------------|--------------------------------------|---------|------|-----------------------------------|--------------------------------------|
| Change Number M-20-04-01 | Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small> | Date February 25, 2004 | | | | | | | | | | | | | | | | |
| Originator J. B. Hebdon | | Phone (509) 372-2400 | | | | | | | | | | | | | | | | |
| Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager | | | | | | | | | | | | | | | | | | |
| Change Title Integrated Closure of the 1706-KE Waste Treatment System and 303-M Oxide Facility and completion of Major Milestone M-20-00A. | | | | | | | | | | | | | | | | | | |
| Description/Justification of Change <p>This change form removes the 1706-KE Waste Treatment System (WTS) and the 303-M Oxide Facility treatment, storage and/or disposal units (TSD) from the scope of Major Milestones M-20-00, M-20-00A and M-20-00B, adds the 1706-KE WTS to the scope of Interim Milestone M-16-52, and modifies Hanford Federal Facility Agreement and Consent Order (Agreement) Appendices B (Listing of TSD Units) and Appendix C (listing of Operable Units and Waste Sites) to reflect current agreements.</p> <p>Specifically, the Agreement is modified by this change form to reflect the agreed closure of the 1706-KE WTS in conjunction with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanup under the 100 Area Remaining Sites Record of Decision. This strategy will allow for an effective use of resources by placing the cleanup activities associated with this facility in a single action. This more efficient approach poses no additional risk in that the present condition of the 1706-KE WTS presents no threat to human health or the environment. In addition, this change request does not alter the scope and schedule of actions required to achieve closure of the 1706-KE WTS. Integrating the closure of the 1706-KE WTS with CERCLA under the terms of the Agreement will be accomplished by adding the four 1706-KE WTS waste sites to Appendix C of the Agreement within the 100-KR-2 Operable Unit and noting this scope under existing Interim Milestone M-16-52. Appendix B is also modified to add the 100-KR-2 as the appropriate operable unit for the 1706-KE WTS.</p> <p>Similarly, fulfillment of closure plan requirements for the 303-M Oxide Facility was transferred to the remediation of the 618-1 Burial Ground waste site within the 300-FF-2 Operable Unit by approved Tri-Party Agreement change request M-20-92-05. Major Milestone M-20-00A is now considered completed with the approval of these actions.</p> <p style="text-align: center;">Description/justification of change is continued on page 2 of 3.</p> | | | | | | | | | | | | | | | | | | |
| Impact of Change No impact is anticipated as a result of this change. | | | | | | | | | | | | | | | | | | |
| Affected Documents Hanford Federal Facility Agreement and Consent Order, as amended | | | | | | | | | | | | | | | | | | |
| Approvals <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 35%; border-bottom: 1px solid black;">  </td> <td style="width: 15%; border-bottom: 1px solid black;"> 3/15/04 </td> <td style="width: 15%; border-bottom: 1px solid black;"> <input checked="" type="checkbox"/> Approved </td> <td style="width: 35%; border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> DOE </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> EPA </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> Ecology </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved </td> </tr> </table> | | |  | 3/15/04 | <input checked="" type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | DOE | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | EPA | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | Ecology | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved |
|  | 3/15/04 | <input checked="" type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | | | | | | | | | | | | | | | |
| DOE | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | | | | | | | | | | | | | | | |
| EPA | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | | | | | | | | | | | | | | | |
| Ecology | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | | | | | | | | | | | | | | | |

The following changes are made to the existing M-20-00 series of Major Milestones.

Note: Struckout text indicates text to be deleted, shaded text indicates text to be added.

| | | |
|--|---|-------------------|
| <p>M-020-00 LEAD AGENCY: ECOLOGY</p> | <p>SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS EXCEPT 303-M OXIDE FACILITY AND 1706-KE WASTE TREATMENT SYSTEM. PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS WILL BE SUBMITTED TO ECOLOGY FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D.</p> <p>PRECLOSURE WORK PLANS WILL BE PREPARED AND SUBMITTED FOR APPROVAL FOR TSD UNITS WHICH WILL ACHIEVE CLOSURE IN CONJUNCTION WITH THE DISPOSITION OF THE FACILITY IN WHICH THEY ARE CONTAINED.</p> <p>COMPLIANCE WITH THE WORK SCHEDULES SET FORTH IN THIS M-20 SERIES IS DEFINED AS THE PERFORMANCE OF SUFFICIENT WORK TO ASSURE WITH REASONABLE CERTAINTY THAT DOE WILL ACCOMPLISH SERIES M-20 MAJOR AND INTERIM MILESTONE REQUIREMENTS.</p> <p>DOE INTERNAL WORK SCHEDULES (E.G., DOE APPROVED SCHEDULE BASELINES) AND ASSOCIATED WORK DIRECTIVES AND AUTHORIZATIONS SHALL BE CONSISTENT WITH THE REQUIREMENTS OF THIS AGREEMENT. MODIFICATION OF DOE CONTRACTOR BASELINE(S) AND ISSUANCE OF ASSOCIATED DOE WORK DIRECTIVES AND/OR AUTHORIZATIONS THAT ARE NOT CONSISTENT WITH AGREEMENT REQUIREMENTS SHALL NOT BE FINALIZED PRIOR TO APPROVAL OF AN AGREEMENT CHANGE REQUEST SUBMITTED PURSUANT TO AGREEMENT ACTION PLAN SECTION 12.0.</p> | <p>12/31/2008</p> |
| <p>M-020-00A</p> | <p>SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POST CLOSURE PLANS FOR ALL RCRA TSD UNITS EXCEPT 216-A-10, 216-A-36B, 216-A-37-1, 207-A SOUTH RETENTION BASIN, 216-S-10 POND, 216-S-10 DITCH, 241-CX-70, 241-CX-71, AND 241-CX-72, 303-M OXIDE FACILITY AND 1706-KE WASTE TREATMENT SYSTEM.</p> | <p>02/28/2004</p> |
| <p>M-020-00B</p> | <p>SUBMIT CLOSURE/POST-CLOSURE PLANS FOR 216-A-10, 216-A-36B, 216-A-37-1, 207-A SOUTH RETENTION BASIN, 216-S-10 POND, 216-S-10 DITCH, 241-CX-70, 241-CX-71, AND 241-CX-72. THE 303-M OXIDE FACILITY CLOSURE/POST CLOSURE, PER APPROVED CHANGE FORM M-20-92-05, IS COVERED SEPARATELY UNDER M-94-01 AND THE 1706-KE WASTE TREATMENT SYSTEM CLOSURE/POST CLOSURE IS COVERED SEPARATELY UNDER M-16-52.</p> | <p>12/31/2008</p> |

Modify Interim Milestone M-16-52 as follows:

Note: Struckout text indicates text to be deleted, shaded text indicates text to be added.

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|-----------------|---|-------------------|
| <p>M-016-52</p> | <p>INITIATE RESPONSE ACTIONS FOR THE REMAINING WASTES SITES FOR THE 100 K AREA INCLUDING CLOSURE OF THE 1706-KE WASTE TREATMENT SYSTEM IN ACCORDANCE WITH SECTION 5.5 OF THE AGREEMENT ACTION PLAN.</p> | <p>07/31/2009</p> |
|-----------------|---|-------------------|

Modify Appendix B to reflect the addition of the 1706-KE WTS to the 100-KR-2 Operable Unit.

Note: ~~Struckout~~ text indicates text to be deleted, shaded text indicates text to be added.

Appendix B
Listing of Treatment, Storage and Disposal Groups/Units

| <u>Treatment, Storage and Disposal</u> | | Operable Unit (if applicable) | <u>Planned Action</u> | |
|--|---|----------------------------------|-----------------------|------------------|
| Group Number | Group/Units | | Closure* | Operating Permit |
| T-1-3** | 1706-KE Treatment Facility (116-KE6 A-D): 1706-KE Waste Accumulation Tank 1706-KE ION Exchange Column 1706-KE Solidification Unit (Evaporator) 1706-KE Condensate Tank | 100-KR-2 | X | |

Add the following 1706-KE Waste Treatment System waste sites to Operable Unit 100-KR-2 in Agreement Appendix C.

| Waste Unit | Waste Unit Aliases | Unit Type | Status |
|-----------------|---|--------------------|---|
| 100-KR-2 | Ecology | | |
| 116-KE-6A** | 116-KE-6A, 1706-KE Condensate Collection Tank, 1706-KE Waste Treatment System | Storage Tank | Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD |
| 116-KE-6B** | 116-KE-6B, 1706-KE Evaporation Tank, 1706-KE Waste Treatment System | Storage Tank | Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD |
| 116-KE-6C** | 116-KE-6C, 1706-KE Waste Accumulation Tank, 1706-KE Waste Treatment System | Storage Tank | Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD |
| 116-KE-6D** | 116-KE-6D, 1706-KE Ion Exchange Column, 1706-KE Waste Treatment System | Process Unit/Plant | Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD |