0048397

Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)

Proposed Tri-Party Agreement Modifications and Reference Documents for

200 Areas Soil Investigation Milestones

Environmental Restoration Project (M-13-00 and M-20-00)

NOV 1997
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Public Comment Period
November 24, 1997 to January 7, 1998

Tri-Party Agreement

E9705131

Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)
Proposed Tri-Party Agreement Modifications
And Reference Documents for

200 Areas Soil Remediation Strategy Environmental Restoration Project (M-13-00 and M-20-00)

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Tri-Party Agreement

TENTATIVE AGREEMENT ON NEGOTIATIONS FOR THE
200 AREAS SOIL REMEDIATION STRATEGY

On April 30, 1997, the U.S. Department of Energy, the State of Washington Department of Ecology and the U.S. Environmental Protection Agency agreed to enter into negotiations on matters relating to developing an improved process for completing the soil investigations for Environmental Restoration Program contaminated soil sites in the 200 Areas. This agreement was followed by negotiation which established modifications to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). The parties agreed to change Appendix D, Work Schedule, M-13 and M-20 milestones.

Pursuant to the Agreement in Principle, dated April 30, 1997, the three parties have concluded the 200 Areas Soil Remediation Strategy negotiations and have reached tentative agreement. A copy of this agreement is attached.

In accordance with the provisions of the Tri-Party Agreement, the proposed changes will be submitted to the public for review and comment over a 45 day period. Copies of the package will be available for review at the public information repositories. Following the 45 day public comment period, the parties will make appropriate revisions before finalizing these changes. The parties anticipate final signatures to take place by January 30, 1998. Prior to finalization, a response to comments document will be issued.

The parties further agree to minimize additional delay in the event the parties fail to agree on any changes as the result of public comment. All unresolved matters shall be referred to the Tri-Party Agreement dispute resolution process beginning at the Inter Agency Management Integration Team (IAMIT) level as described in the Tri-Party Agreement. The parties shall attempt to resolve the dispute(s) as provided in the Tri-Party Agreement paragraph 30 and/or 59.

Signed this 31 day of October 1997

Tom Fitzsimmons, Director
State of Washington
Department of Ecology

Chuck Clarke, Regional Administrator
U.S. Environmental Protection Agency
Region 10

John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

052506

CONCLUSION AGREEMENT ON NEGOTIATION FOR THE
200 AREAS SOIL REMEDIATION STRATEGY

In accordance with the requirements of the parties Agreement in Principle, dated April 30, 1997, the State of Washington Department of Ecology, the U.S. Environmental Protection Agency, and the U.S. Department of Energy, (the parties) have concluded negotiations on commitments for the 200 Areas Soil Remediation Strategy at the Hanford Site. A Tentative Agreement has been reached and a package of proposed changes to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) has been developed and found mutually acceptable to the parties. These changes are attached to this Negotiation Conclusion Agreement.

In addition to the attached changes to the Hanford Federal Facility Agreement and Consent Order, the parties have agreed that:

- The *200 Areas Soil Remediation Strategy - Environmental Restoration Program*, DOE/RL-96-67, Rev. 0 and *Waste Site Grouping for 200 Areas Soil Investigations*, DOE/RL-96-81, Rev. 0 provide the necessary explanations to describe the improved investigation approach.
- USDOE shall drill a borehole in the B-2-2 Ditch to satisfy the requirement of the dispute resolution for 200-BP-11.
- Activities associated with the Hanford Prototype Barrier Program (200-BP-1) and 200-ZP-2 will continue and not be modified by this Agreement.
- Briefings and offers for consultations with stakeholders and the Tribes have been made and will continue, as appropriate, throughout the public comment and disposition period.

It is the parties' intent to submit the proposed changes for a 45 day public comment period to run from approximately October 20, 1997 to December 4, 1997. Specific Public Comment Period dates will be coordinated to ensure HAB opportunity for review and comment. Final approval of the Agreement changes is expected to occur by January 30, 1998. After successful resolution of any resulting public comments, a response to comments document will be issued.

Contingent upon final approval of the Tentative Agreement by the Signatories, and consideration and resolution of any resulting public comments, it is the parties' intent to approve these changes and incorporate them into the Agreement.

10/8/97
Jack Donnelly — Date
Lead Negotiator for the
State of Washington
Department of Ecology

Douglas R. Sherwood 10/8/97
Doug Sherwood — Date
Lead Negotiator for the
U. S. Environmental Protection
Agency

10/8/97
George Sanders — Date
Lead Negotiator for the
U.S. Department of Energy

Bryan Foley 10/8/97
Bryan Foley — Date
Lead Negotiator for the
U. S. Department of Energy

Tri-Party Agreement

Changes Proposed to Hanford's Tri-Party Agreement

200 Areas Soil Investigation Milestones

Environmental Restoration Project (M-13-00 and M-20-00)

U.S. Department of Energy • U.S. Environmental Protection Agency • Washington State Department of Ecology

REQUEST FOR PUBLIC COMMENT

The U.S. Department of Energy (DOE), the Washington State Department of Ecology, and the U.S. Environmental Protection Agency (Tri-Parties) want your comments on changes to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestones for 200 Areas soil investigation in the Environmental Restoration Project. The changes have been made to reflect a more streamlined approach described in the *200 Areas Soil Remediation Strategy-Environmental Restoration Program* and grouping by similar waste types described in the *Waste Site Grouping for 200 Areas Soil Investigations.* All comments will be considered by the agencies before a final decision is made. **The public comment period begins November 24, 1997 and ends January 7, 1998.**

To request a copy of the document, or to submit comments either written or electronically, please contact:

Bryan Foley
U.S. Department of Energy
P.O. Box 550 (HO-72)
Richland, WA 99352
(509) 376-7087
E-mail: bryan_l_foley@rl.gov

BACKGROUND

The Hanford 200 Areas lie at the center of the Hanford Site (see map). Starting in 1943 and continuing for almost 50 years, facilities in the 200 Areas were used to separate uranium and plutonium out of irradiated nuclear fuel. In the process, radioactive and non-radioactive wastes were discharged to the soil around the facilities, contaminating the soil. Some of this contamination migrated to the groundwater.

The Tri-Party Agreement lists about 700 soil waste sites in the 200 Areas. Some of these are identified as Resource Conservation and Recovery Act (RCRA) sites and others as Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites. The Tri-Party Agreement contains a process and milestones to investigate and clean up these sites. Under the current process, the 200 Areas soil waste sites are grouped geographically into 32 operable units. Each operable unit would be investigated, evaluated, and cleaned up individually. Milestones require DOE to prepare work plans to investigate each operable unit.

WHAT ARE THE PROPOSED TRI-PARTY AGREEMENT CHANGES?

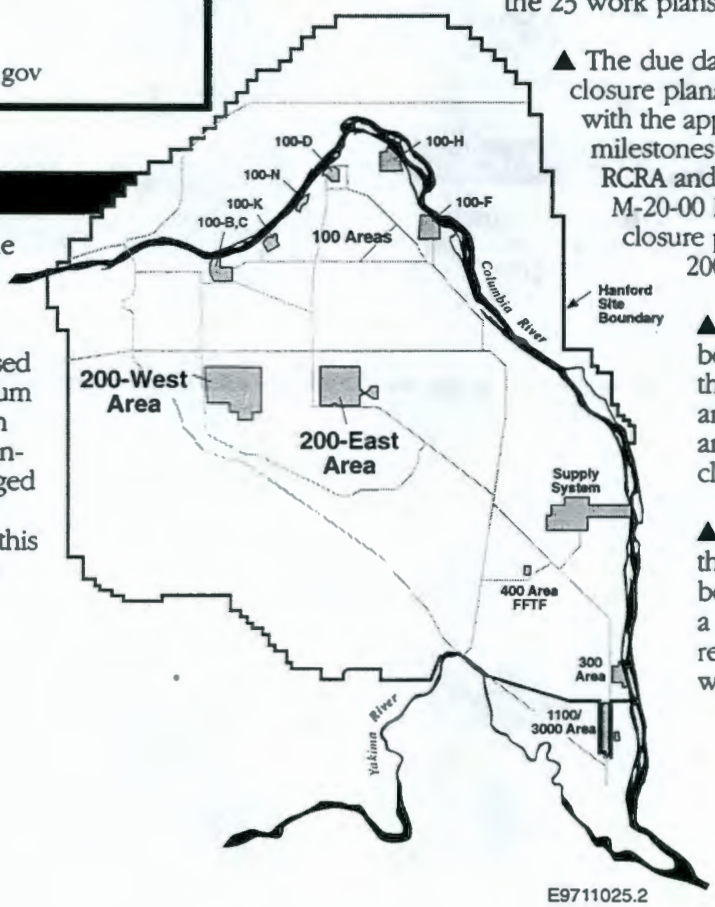
▲ CERCLA work plan submittals would be completed one year earlier than in the current Tri-Party Agreement schedule.

▲ The number of work plan submittals will be reduced from 32 to 23, reflecting the new waste groups. All of the 200 Areas soil waste sites will be incorporated into the 23 work plans.

▲ The due dates for individual RCRA closure plans will be adjusted to align with the appropriate CERCLA work plan milestones to allow coordination of RCRA and CERCLA. This will delay the M-20-00 Milestone date for RCRA closure plan submittals four years to 2004.

▲ An Implementation Plan will be developed that will establish the regulatory requirements and framework for CERCLA and RCRA work plans and closure plans.

▲ The waste groups for the first six work plans will be established along with a schedule for the remaining 17 waste group work plans.



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WHY ARE THE CHANGES BEING PROPOSED?

The milestone changes provide an improved process to investigate (characterize) the waste sites using lessons learned from cleanup already done in the 100 and 300 Areas at Hanford. One lesson learned is to group similar types of waste sites together for characterization and evaluation; this reduces the number of documents issued and lowers the cost. Another lesson learned is to investigate RCRA and CERCLA sites together to satisfy the requirements of both laws.

These changes maintain the Tri-Parties commitment to completion of 200 Areas soil waste site investigations under M-15-00 by December 2008 and the Tri-Parties commitment to completion of waste site cleanup under M-16-00 by 2018.

Key Points

- ▲ Reorganizes the 200 Areas soil waste sites into 23 waste groups. Each waste group would represent a different waste site type. The number of documents generated using 23 waste groups (compared to 32 operable units) would be reduced, saving an estimated $11 million over the next 3-1/2 years.
- ▲ Proposes to characterize and evaluate the representative waste sites in each group and apply the results to other similar sites in the group.
- ▲ Coordinates RCRA closure plans and CERCLA work plans. The plans would be prepared under a single process with synchronized schedules.
- ▲ Supports integration of the tank waste program, groundwater program, waste management program, or facilities programs with environmental restoration work.

FOR MORE INFORMATION CONTACT:

Bryan Foley
U.S. Department of Energy
P.O. Box 550 (HO-72)
Richland, WA 99352
(509) 376-7087

Or call the Hanford Cleanup Toll-free Line at 1-800-321-2008.

HOW CAN YOU BE INVOLVED?

The proposed modifications and associated information may be reviewed at the information repositories listed below. Two additional documents are available to aid in reviewing the change package:

The *200 Areas Soil Remediation Strategy-Environmental Restoration Program* describes how the grouping based on waste site type will streamline the characterization process.

The *Waste Site Grouping for 200 Areas Soil Investigations* establishes the various groups and assigns the environmental restoration soil waste sites to the 23 waste groups.

A written summary of comments and responses will be sent to all individuals who provided comments, and will also be placed in the public information repositories. A public meeting is not currently scheduled, however, should public interest indicate a need for a meeting, the Tri-Parties will respond accordingly.

PUBLIC INFORMATION REPOSITORIES LOCATIONS:

PORTLAND
Portland State University
Branford Price Millar Library
Science and Engineering Floor
Tri-Party Information Repository
934 SW Harrison
(503) 725-3690
Attn: Michael Bowman

SEATTLE
University of Washington
Suzzallo Library
Government Publications Room
(206) 543-4664
Attn: Eleanor Chase

RICHLAND
U.S. Department of Energy Reading Room
Washington State University, Tri-Cities
Consolidated Information Center, Room 101L
(509) 372-7443
Attn: Terri Traub

SPOKANE
Gonzaga University
Tri-Party Information Repository
Foley Center
E. 502 Boone
(509) 324-5932
Attn: Tim Fuhrman

U.S. Department of Energy
P.O. Box 550 (HO-14)
Richland, Washington 99352

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Change Number M-13-97-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 10/7/97

Originator: Linda Bauer

Phone: 376-6628

Class of Change

[X] I - Signatories [ ] II - Executive Manager [ ] III - Project Manager

Change Title

Milestone Series M-13 Revisions to Support 200 Area Soil Remediation Strategy

Description/Justification of Change

M-13-00 contains schedules for the submittal of work plans for accomplishing necessary investigations to complete all 200 Areas soil investigations by December 31, 2008 (M-15-00C). The three parties jointly developed an improved approach to investigation and subsequent remediation of 200 Areas contaminated soil sites within the responsibility of the Environmental Restoration Program (EM-40) based on lessons learned from Hanford's 100 and 300 Areas. To date, the investigation approach for the 200 Areas has been based on a geographic boundary (operable unit) consisting of different waste site types. Remedial investigations will now focus on representative sites from groups with similar history and waste site types (ponds, ditches, cribs, etc.), and the results will be generally applied to the entire waste site group.

[Description/Justification of Change is continued]

Impact of Change

Modifications of the Tri-Party Agreement that are needed to accommodate this strategy are as follows:

- Modify milestone M-13-00K to require only one work plan.
- Delete milestone M-13-00Q to be consistent with the current reduced number of work plans.
- Delete interim milestones M-13-11, M-13-12, M-13-13, M-13-14, M-13-15, M-13-16, and M-13-17. These milestones are replaced with milestones M-13-18 through M-13-24.
- Add interim milestone M-13-18, "Submit 200 Area RI/FS (RFI/CMS) Implementation Plan.", 8/31/98.

[Impact of Change is continued]

Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan.

Approvals

DOE	Date	___ Approved	___ Disapproved
EPA	Date	___ Approved	___ Disapproved
Ecology	Date	___ Approved	___ Disapproved

Description/Justification of Change (continued)

The 200 Area RI/FS (RFI/CMS) Implementation Plan (which will be a primary document per Section 9 of the TPA and will establish the common requirements for future characterizations in the 200 Areas) will provide up front approval of all cross-cutting aspects of the characterizations and individual Work Plans for the 23 waste site groups (previously 32 work plans were required) which will be prepared to address site-specific requirements. These plans will incorporate both *Resource Conservation and Recovery Act* (RCRA) requirements as well as *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) requirements (see associated Agreement Change Control Form for M-20-97-01 for additional detail). These documents in combination will meet all substantive requirements of CERCLA RI/FS and RCRA RFI/CMS Work Plans. Interim milestones M-13-18 through M-13-24 reflect this approach and replace milestones M-13-11 through M-13-17. Major milestone M-13-00K and M-13-00Q will be revised to accommodate the reduced number of work plans to be generated. The waste site groupings will require redesignation of existing Operable Units associated with 200 Areas soil remediation in the Environmental Restoration project. Changes to Appendix C of the Action Plan will be required to reflect these new operable unit designations and will be performed upon approval of this change control form. Please refer to associated Agreement Change Control Form M-20-97-01 for additional changes to M-20 milestones.

Impact of Change (continued):

- Add interim milestone M-13-19, "Submit 200 North Pond and Trenches Cooling Water Group Work Plan.", 2/28/99.
- Add interim milestone M-13-20, "Submit 200 Gable Mountain/B Pond and Ditch Cooling Water Group Work Plan.", 4/30/99.
- Add interim milestone M-13-21, "Submit 200 Chemical Sewer Group Work Plan.", 8/31/99.
- Add interim milestone M-13-22, "Submit 200 U Pond/Z-Ditches Cooling Water Group Work Plan.", 12/31/99.
- Add interim milestone M-13-23, "Submit Uranium Rich Process Waste Group Work Plan.", 4/30/00.
- Add interim milestone M-13-24, "Submit General Process Waste Group Work Plan.", 8/31/00.

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-13-00K	SUBMIT 1 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2000
M-13-00L	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2001
M-13-00M	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2002
M-13-00N	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2003
M-13-00O	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2004
M-13-00P	SUBMIT 4 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2005
M-13-18	SUBMIT 200 AREA RI/FS (RFI/CMS) IMPLEMENTATION PLAN.	8/31/1998
M-13-19	SUBMIT 200 NORTH POND COOLING WATER GROUP WORK PLAN	2/28/1999
M-13-20	SUBMIT GABLE MOUNTAIN/B POND AND DITCH COOLING WATER GROUP WORK PLAN.	4/30/1999
M-13-21	SUBMIT CHEMICAL SEWER GROUP WORK PLAN.	8/31/1999
M-13-22	SUBMIT U POND/Z-DITCHES COOLING WATER GROUP WORK PLAN.	12/31/1999
M-13-23	SUBMIT URANIUM RICH PROCESS WASTE GROUP WORK PLAN.	4/30/2000
M-13-24	SUBMIT GENERAL PROCESS WASTE GROUP WORK PLAN.	8/31/2000

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-13-00K	SUBMIT 21 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2000
M-13-00L	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2001
M-13-00M	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2002
M-13-00N	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2003
M-13-00O	SUBMIT 3 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2004
M-13-00P	SUBMIT 4 200 NPL RI/FS (RFI/CMS) WORK PLANS.	12/31/2005
~~M-13-00Q~~	~~SUBMIT 4 200 NPL RI/FS (RFI/CMS) WORK PLANS.~~	~~12/31/2006~~
~~M-13-11~~	~~SUBMIT 200 PO 2 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.~~	~~6/30/1998~~
~~M-13-12~~	~~SUBMIT 200 PO 4 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.~~	~~10/31/1998~~
~~M-13-13~~	~~SUBMIT 1 200 NPL RI/FS (RFI/CMS) WORK PLAN.~~	~~12/31/1998~~
~~M-13-14~~	~~SUBMIT 200 IU 3 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.~~	~~2/28/1999~~
~~M-13-15~~	~~SUBMIT 200 RO 1 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.~~	~~6/30/1999~~
~~M-13-16~~	~~SUBMIT 200 PO 5 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.~~	~~10/31/1999~~
~~M-13-17~~	~~SUBMIT 200 SO 1 RFI/CMS CLOSURE/POSTCLOSURE WORK PLAN.~~	~~2/28/2000~~
M-13-18	SUBMIT 200 AREA RI/FS (RFI/CMS) IMPLEMENTATION PLAN.	8/31/1998
M-13-19	SUBMIT 200 NORTH POND COOLING WATER GROUP WORK PLAN	2/28/1999
M-13-20	SUBMIT GABLE MOUNTAIN/B POND AND DITCH COOLING WATER GROUP WORK PLAN.	4/30/1999
M-13-21	SUBMIT CHEMICAL SEWER GROUP WORK PLAN.	8/31/1999
M-13-22	SUBMIT U POND/Z-DITCHES COOLING WATER GROUP WORK PLAN.	12/31/1999
M-13-23	SUBMIT URANIUM RICH PROCESS WASTE GROUP WORK PLAN.	4/30/2000
M-13-24	SUBMIT GENERAL PROCESS WASTE GROUP WORK PLAN.	8/31/2000

052506

Change Number	Federal Facility Agreement and Consent Order Change Control Form	Date
M-20-97-01	Do not use blue ink. Type or print using black ink.	10/7/97

Originator: Linda Bauer

Phone: 376-6628

Class of Change

[X] I - Signatories [ ] II - Executive Manager [ ] III - Project Manager

Change Title

Agreement Milestone series M-20 Revisions to Support 200 Area Soil Remediation Strategy

Description/Justification of Change

M-20-00 contains schedules for the submittal of closure plans for the cleanup of treatment, storage, and disposal (TSD) sites under the *Resource Conservation and Recovery Act* (RCRA). The three parties jointly developed an improved approach to investigation and subsequent remediation of RCRA TSD waste sites closely associated with past-practice units within the Environmental Restoration (ER) Program (EM-40), based on lessons learned from Hanford's 100 and 300 Areas. The coordination of the TSD units closure with the past-practice investigation and remediation activity is necessary to prevent overlap and duplication of work, thereby economically and efficiently addressing the contamination. These TSD groups/units assigned to an operable unit are prioritized in conjunction with past-practice priorities for purposes of investigations and are to be investigated and managed in conjunction with past-practice units. Remedial investigations will now focus on representative sites from groups with similar history and waste site types (ponds, ditches, cribs, etc.), and the results will be generally applied to the entire waste site group.

[Description/Justification of Change is continued]

Impact of Change

Modifications to implement this strategy are:

- M-20-00 major milestone has been changed to February 28, 2004 and reference to EPA is to be deleted.
- M-20-33 interim milestone has been changed to delete reference to EPA and to be in coordination with the Uranium Rich Process Waste Group with the corresponding Due Date changed to 10/31/2003.
- M-20-39 interim milestone has been changed to delete reference to EPA and to be in coordination with the Chemical Sewer Group with the corresponding Due Date changed to 2/28/2003.

[Impact of Change is continued]

Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan.

Approvals

DOE	Date	___ Approved	___ Disapproved
EPA	Date	___ Approved	___ Disapproved
Ecology	Date	___ Approved	___ Disapproved

Description/Justification of Change (continued):

These investigations will be sufficiently comprehensive to satisfy the technical requirements of both RCRA and *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA). Technical requirements of both RCRA and CERCLA are not all inclusive, but are focused on the initial stages of cleanup/closure where representative data is generally adequate for remedy selection purposes. However, it is recognized that waste site specific data is required to satisfy RCRA Closure/Postclosure requirements. The information necessary for performing RCRA closures/postclosures will be provided in coordination with past-practice sites investigations and various RFI/CMS documents. The 200 Area RI/RS (RFI/CMS) Implementation Plan (which will be a primary document per Section 9 of the TPA and will establish the common requirements for future characterizations in the 200 Areas) will provide up front approval of all cross-cutting aspects of the characterizations and individual Work Plans for the 23 waste site groups (previously 32 work plans were required) will be prepared. These plans will incorporate both RCRA requirements as well as CERCLA requirements (see associated Agreement Change Control Form for M-13-97-01 for additional detail). These documents in combination will meet all substantive requirements of CERCLA RI/FS and RCRA RFI/CMS Work Plans. The existing M-13 and M-20 milestones are not aligned to compliment integration and the adjustment of the M-20-00 milestone to 2/28/2004 allows for a coordinated alignment of these two milestones. Interim milestones M-20-33 through M-20-54 have been modified both in text and submittal dates to reflect this approach. Changes to Appendix B of the Action Plan will be required to reflect these new operable unit designations and will be performed upon approval of this change control form. Please refer to associated Agreement Change Control Form M-13-97-01 for additional changes to M-13 milestones.

Impact of Change (continued):

- M-20-52 interim milestone has been changed to delete reference to EPA and to be in coordination with the General Process Waste Group with the corresponding Due Date changed to 12/31/2003.
- M-20-53 interim milestone has been changed to delete reference to EPA and to be in coordination with the General Process Waste Group with the corresponding Due Date changed to 12/31/2003.
- M-20-54 interim milestone has been changed to delete reference to EPA and to be in coordination with the Infrastructure Waste Group with the corresponding Due Date changed to 2/28/2004.

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-20-00	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS.	2/28/2004
LEAD AGENCY: ECOLOGY	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. 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.	
M-20-33	SUBMIT 216-A-10 CRIB AND 216-A-36B CRIB CLOSURE/POSTCLOSURE PLANS TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE URANIUM RICH PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-23).	10/31/2003
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE/POSTCLOSURE PLANS TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE CHEMICAL SEWER GROUP (TO BE COORDINATED WITH M-13-21).	2/28/2003
M-20-52	SUBMIT 216-A-37-1 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	12/31/2003
M-20-53	SUBMIT 207-A RETENTION BASIN CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	12/31/2003
M-20-54	SUBMIT 241-CX TANK SYSTEM CLOSURE/POSTCLOSURE PLAN TO ECOLOGY IN COORDINATION WITH THE WORK PLAN FOR THE INFRASTRUCTURE WASTE GROUP (TO BE COORDINATED WITH M-13-00K).	2/28/2004

THE AGREEMENT TEXT IS MODIFIED AS FOLLOWS:

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-20-00 **LEAD AGENCY: ECOLOGY**	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS. PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS WILL BE SUBMITTED TO ECOLOGY ~~AND/OR EPA~~ FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D. 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.	~~12/31/2003~~ 2/28/2004
M-20-33	SUBMIT 216-A-10 CRIB AND 216-A-36B CRIB CLOSURE/POSTCLOSURE PLANS TO ECOLOGY ~~AND EPA~~ IN COORDINATION WITH THE WORK PLAN ~~FOR OPERABLE UNIT 200-PO-2 (TO BE SATISFIED BY M-13-11)~~ FOR URANIUM RICH PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-23).	~~6/30/98~~ 10/31/2003
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE/POSTCLOSURE PLANS TO ECOLOGY ~~AND EPA~~ IN COORDINATION WITH ~~THE WORK PLAN FOR OPERABLE UNIT 200-RO-1 TO BE SATISFIED BY M-13-15)~~ THE CHEMICAL SEWER GROUP WORK PLAN (TO BE COORDINATED WITH M-13-21).	~~6/30/99~~ 2/28/2003
M-20-52	SUBMIT 216-A-37-1 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY ~~AND EPA~~ IN COORDINATION WITH THE WORK PLAN ~~OF OPERABLE UNIT 200-PO-4 (TO BE SATISFIED BY M-13-12)~~ FOR THE GENERAL PROCESS WASTE GROUP (TO BE COORDINATED WITH M-13-24).	~~10/31/98~~ 12/31/2003
M-20-53	SUBMIT 207-A RETENTION BASIN CLOSURE/POSTCLOSURE PLAN TO ECOLOGY ~~AND EPA~~ IN COORDINATION WITH THE WORK PLAN ~~OF OPERABLE UNIT 200-PO-5 (TO BE SATISFIED BY M-13-16)~~ FOR THE GENERAL PROCESS WASTE GROUP(TO BE COORDINATED WITH M-13-24).	~~10/31/99~~ 12/31/2003
M-20-54	SUBMIT 241-CX TANK SYSTEM CLOSURE/POSTCLOSURE PLAN TO ECOLOGY ~~AND EPA~~ IN COORDINATION WITH THE WORK PLAN ~~OF OPERABLE UNIT 200-SO-1 (TO BE SATISFIED BY M-13-17)~~ FOR THE INFRASTRUCTURE WASTE GROUP (TO BE COORDINATED WITH M-13-00K).	~~2/28/2000~~ 2/28/2004

List of Reference Documents

1. **Waste Site Grouping for 200 Areas Soil Investigations, DOE/RL-96-81, Rev. 0, January 1997.**

2. **200 Areas Soil Remediation Strategy – Environmental Restoration Program, DOE/RL-96-67, Rev. 0, September 1996.**