

# START

Enclosure

0039143

|  |  |   |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
|--|--|---|---|-----------------------------------|--------------------------------------|---|---------------------------------------|-----------------------------------|---|---|---------------------------------------|-----------------------------------|---|--|
| Change Number<br>M-17-94-02  | <b>Federal Facility Agreement and Consent Order<br/>         Change Control Form</b><br><small>Do not use blue ink. Type or print using black ink.</small> | Date<br>9/12/94                             |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Originator<br>S. D. Godfrey  |  | Phone<br>(509) 372-0501                     |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Class of Change<br><input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager   |  |   |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Change Title    Delay Startup of 300 Area Treated Effluent Disposal Facility (TEDF) to<br>6/30/95 (TPA Milestone M-17-09) Due to Legal and Regulatory Issues   |  |   |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Description/Justification of Change<br><br>The parties agree that significant legal and regulatory issues, associated with startup of the 300 Area Treated Effluent Disposal Facility (TEDF), are preventing the December 31, 1994 scheduled completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-17-09. This change extends the scheduled completion of Milestone M-17-09 to June 30, 1995.<br><br>The principal areas of concern are related to obtaining 1) a National Pollutant Discharge Elimination System (NPDES) Permit that can be complied with using the existing best available technology (BAT) facility design, and 2) a Land Lease for operating the 300 Area outfall piping. These concerns and the justification for approval of this change request are fully described below.<br><br><div style="text-align: right;">(Continued on next page)</div>   |  |   |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Impact of Change<br><br>The immediate impact of this change is to delay startup of the 300 Area TEDF from December 31, 1994 to June 30, 1995. This delay will allow for the resolution of significant legal and regulatory issues associated with facility operation. During this time, liquid effluents from 300 Area process wastewater will continue to be discharged into the 300 Area Process Trenches.   |  |   |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Affected Documents<br><br>Hanford Federal Facility Agreement and Consent Order, Forth Amendment, January 1994, Appendix D (Table D, page D-28, and Action Plan Work Schedule, page 8 of 40)  |  |   |   |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| Approvals<br><br><table border="0"> <tr> <td data-bbox="97 1645 550 1715"> <u>Robert H. Hoet</u><br/> <small>DOE</small> </td> <td data-bbox="581 1645 722 1715"> <u>9/12/94</u><br/> <small>Date</small> </td> <td data-bbox="777 1674 918 1701"> <input type="checkbox"/> Approved         </td> <td data-bbox="950 1674 1122 1701"> <input type="checkbox"/> Disapproved         </td> </tr> <tr> <td data-bbox="97 1715 550 1786"> <u>Douglas R. Skyring</u><br/> <small>EPA</small> </td> <td data-bbox="581 1715 722 1786"> <u>9/20/94</u><br/> <small>Date</small> </td> <td data-bbox="777 1752 918 1779"> <input type="checkbox"/> Approved         </td> <td data-bbox="950 1752 1122 1779"> <input checked="" type="checkbox"/> Disapproved         </td> </tr> <tr> <td data-bbox="97 1786 550 1877"> <u>Roger Spurling</u><br/> <small>Ecology</small> </td> <td data-bbox="581 1786 722 1877"> <u>9/19/94</u><br/> <small>Date</small> </td> <td data-bbox="777 1831 918 1858"> <input type="checkbox"/> Approved         </td> <td data-bbox="950 1831 1122 1858"> <input checked="" type="checkbox"/> Disapproved         </td> </tr> </table> |  | <u>Robert H. Hoet</u><br><small>DOE</small> | <u>9/12/94</u><br><small>Date</small>           | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved | <u>Douglas R. Skyring</u><br><small>EPA</small> | <u>9/20/94</u><br><small>Date</small> | <input type="checkbox"/> Approved | <input checked="" type="checkbox"/> Disapproved | <u>Roger Spurling</u><br><small>Ecology</small> | <u>9/19/94</u><br><small>Date</small> | <input type="checkbox"/> Approved | <input checked="" type="checkbox"/> Disapproved |  |
| <u>Robert H. Hoet</u><br><small>DOE</small>  | <u>9/12/94</u><br><small>Date</small>  | <input type="checkbox"/> Approved           | <input type="checkbox"/> Disapproved            |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| <u>Douglas R. Skyring</u><br><small>EPA</small>  | <u>9/20/94</u><br><small>Date</small>  | <input type="checkbox"/> Approved           | <input checked="" type="checkbox"/> Disapproved |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |
| <u>Roger Spurling</u><br><small>Ecology</small>  | <u>9/19/94</u><br><small>Date</small>  | <input type="checkbox"/> Approved           | <input checked="" type="checkbox"/> Disapproved |                                   |                                      |   |                                       |                                   |   |   |                                       |                                   |   |  |

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